

Program Review

Federal Highway
Administration

Federal Transit
Administration

INDOT



Certification Review of the Indianapolis Transportation Planning Process

October 2010

FINAL REPORT

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Executive Summary

On August 23-25, 2010 the Federal Highway Administration (FHWA) and the Federal Transit Administration (FTA) conducted a Certification Review of the transportation planning process for the Indianapolis Metropolitan Planning Area (MPA; see Appendix 1). FHWA and FTA are required to jointly review and evaluate the transportation planning process for each urbanized area (UZA) over 200,000 in population at least every four years to determine if the process meets the Federal planning requirements. The Indianapolis Metropolitan Planning Organization (IMPO), in partnership with the Indiana Department of Transportation (INDOT) and the Indianapolis Public Transit Corporation (IndyGo), are responsible for surface transportation planning in all or portions of Marion, Shelby, Johnson, Morgan, Hendricks, Boone, Hamilton, and Hancock Counties in Central Indiana. The purpose of this Certification Review is to assure the planning process satisfactorily addresses the Federal planning requirements, make recommendations regarding how the process might be enhanced, and identify best practices to share with other MPOs.

The review team identified the following corrective action:

Corrective Action 1 - IMPO and INDOT must add awarded transit projects to the 2006-2008 Listing of Obligated Projects, develop the 2009-2011 Listing of Obligated Projects and post them on the IMPO website by September 30, 2011.

The review team also recommends the MPO seriously consider the following action items for implementation:

Recommendation 1 – The IMPO Planning MOU should be updated to reflect the redesignation of the Indianapolis Department of Metropolitan Development as the MPO. The update can also clarify that IMPO is the planning and programming lead for the portion of the Anderson UZA within Hamilton County and the portion of the Columbus UZA within Johnson and Shelby Counties. The revisions can also clarify roles and responsibilities should the Indianapolis and Anderson UZAs grow together pursuant to the 2010 Census and 23 CFR 450.314(d) & (f).

Recommendation 2 - IMPO should consider, analyze and document alternative land use scenarios in the 2035 Transportation Plan. This could be comparable to the way road and transit network alternatives are often evaluated before selecting a final transportation scenario. The land use alternatives could be assessed using cost-benefit analyses and other assumptions documented as part of the planning process. Ultimately, IMPO could quantify expected improvements to transportation system balance, transit usage, and overall socioeconomic conditions based upon various future growth scenarios.

Recommendation 3 – USDOT commends the MPO for developing a pavement management system for the MPA and for using the PSI as a primary metric in the TIP prioritization of pavement preservation projects. USDOT would like to encourage the MPO to utilize the tool to identify and prioritize pavement preventive maintenance projects. By identifying the optimal investment strategy and implementing it at the right time, the life cycle cost of the pavement can be optimized. We encourage IMPO to meet with INDOT and FHWA pavement specialists to explore this approach and to determine whether Federal-aid funds can be used for such pavement management strategies as they are on the INDOT jurisdiction system.

Recommendation 4 – USDOT encourages IMPO to adopt a Complete Streets Policy as part of the 2035 MTP update to accommodate non-vehicular modes for all road projects. The policy could include a clause to exempt a project given certain circumstances.

Recommendation 5 - It is recommended that IMPO and INDOT evaluate and integrate into the CMP more aggressive TDM strategies to reduce the demand for SOV transport and overall travel. Strategies such as growth management and corridor-level congestion pricing in addition to system-wide VMT and fuel pricing should be fully vetted. Documentation should be developed to provide transparency regarding implementation challenges.

IMPO should demonstrate potential benefits using known elasticities on the effects of pricing and land use design on VMT and transit ridership in addition to walking and bicycling. Consideration for roadway capacity expansion projects should take place after implementation of a growth management and/or pricing strategy in addition to other demand reduction strategies. Innovative methods have the potential to enhance selection by FTA of the Northeast Corridor fixed guideway project into preliminary engineering.

Recommendation 6 – The Indianapolis MPO is reminded that the next TIP must address the new federal requirement that a TIP list *“estimated total project cost, which may extend beyond the four years of the TIP”*. This keeps elected officials informed of the total project cost, even when the current TIP may only include the initial phases of preliminary engineering, right-of-way, or construction.

Recommendation 7 –The Indianapolis MPO did an excellent job of tracking implementation of ARRA projects. USDOT encourages IMPO to implement a similar process on a quarterly basis for all other projects. The INDOT Local Public Agency (LPA) Project Development Process requires each project sponsor to have an employee in responsible charge (ERC)

that has completed LPA certification training. IMPO can assist project sponsors by monitoring their funding and project development. IMPO can also help to ensure they maintain a certified ERC, as required by the State's new federal-aid LPA Project Development Procedures.

Recommendation 8 – It is recommended that IMPO modify the TIP amendment procedures to allow the IMPO Executive Director to approve minor TIP amendments for exempt projects where public involvement on the overall project has already taken place. Examples include projects where CN is already programmed in the TIP, but the PE or ROW phase were overlooked. Another example is where a new TIP has been approved, but a project in the previous TIP had not been advanced to authorization and now needs to be amended into the new TIP. The process should include notification of the Policy Committee that the administrative TIP amendment was approved, so they are aware of the correction.

Recommendation 9 – The MPO should use visual techniques to depict on a map in the MTP where transportation expansion and other significant projects are located in relation to areas with substantial low income and minority residential populations. The graphic should be included with analysis demonstrating that these protected populations receive proportionate benefits and do not receive disproportionate negative impacts from the projects. The analysis should be cognizant of the impacts on racial income disparity over time and racial integration in terms of the Dissimilarity Index (<http://www.census.gov/segregation.html>).

Recommendation 10 – IMPO should work jointly with INDOT to clarify the requirements for ADA Transition Plans and jointly develop an enforcement plan within 18 months for all applicable recipients of federal-aid transportation funds.

Recommendation 11: It is strongly recommended that the forthcoming Northeast Corridor New Starts application to enter preliminary engineering demonstrate innovative strategies to enhance feasibility of the project. This should include steps that have been implemented to support sufficient ratings for each of the criteria: mobility improvements; environmental benefits; operating efficiencies; cost effectiveness, and; transit supportive land use policies/future land use patterns. Project benefits should be quantified using broad performance measures such as those identified in the Planning Factors section. Evidence of commitment to performance-based planning should include intergovernmental agreements regarding establishment of Transit-Oriented Development (TOD) and comparable overall zoning/building codes to support public transportation.

Recommendation 12 – USDOT applauds IMPO and their Multimodal Task Force for the numerous successes in implementing the Regional Bicycle Plan. USDOT encourages IMPO to include an item in the 2011 UPWP to update the Regional Bicycle Plan to establish consensus regarding future priorities.

Recommendation 13 – IMPO is encouraged to further examine the potential applicability of the LUCI land-use allocation methods for their possible integration with the existing four step regional model. IMPO would then be able to evaluate alternative land use scenarios as part of future updates to the MTP.

Recommendation 14 – It is recommended that IMPO develop and implement performance measures in the MTP to expand upon those that address traffic movement. The measures should gauge widespread performance of the multi-modal (roadway, transit, truck/rail freight, non-motorized) transportation system.

Recommendation 15 – USDOT encourages IMPO to build upon the current Safety Study to develop a systematic regional approach to safety planning. The safety analysis should identify high accident locations throughout the MPA and complete a Roadway Safety Audit to identify strategies to address deficiencies. The IRTC should use the results of this systematic regional approach to develop a 4-year list of Highway Safety Improvement Program (HSIP) and Congestion Mitigation and Air Quality (CMAQ) Projects for inclusion in the TIP. By prioritizing a 4-year list of projects based on need, LPAs will have time to develop quality projects using available HSIP/CMAQ funds.

The review team also wanted to highlight best practices that were identified during this review that we intend to share with other MPOs:

Commendation 1 – The updated Bylaws are exemplary, as is the Policy and Procedures Manual that is posted on the MPO website at http://www.indympo.org/About/Documents/MPO_Policy_and_Procedure_Manual_2010.pdf. These documents provide new members with a quick easy source of information so they can fully participate and benefit from regional planning and programming. The requirement that member jurisdictions contribute their proportionate share of local planning matching funds allows the MPO to fully utilize the USDOT planning funds to support a sound transportation planning process.

Commendation 2 - The IMPO 2005-2009 Strategic Plan has been particularly effective in allowing the IRTC Policy and Tech representatives to efficiently direct resources to meet the associated goals & objectives. Successes in areas such as data collection, update of the travel demand model to support the FTA New Starts Alternatives Analysis, adequate

staffing, and an equitable/stable source of local planning matching funds find their roots in this Strategic Plan.

Commendation 3 – USDOT applauds the unprecedented level of effort and public outreach that the MPO is applying in support of the 2035 Transportation Plan update and associated Indy-Connect initiative. The public-private leadership being provided by the MPO, Indy-GO, CIRTA, and the Central Indiana Transit Task Force are essential to garner the local support and additional resources needed to support improved transportation for the region as a whole.

Subject to addressing the corrective action and reporting the progress in implementing the recommendations cited in this report, FHWA and FTA jointly act to certify the transportation planning process of this region. The Metropolitan Transportation Planning Process for the Indianapolis Metropolitan Planning Organization (IMPO) is consistent with the federal planning requirements in 23 U.S.C. 134(i)(5) and 49 U.S.C. 1607.

Purpose and Objective

Pursuant to 23 United States Code 134(i)(5) and 49 U.S.C. 1607, the Federal Highway Administration (FHWA) and the Federal Transit Administration (FTA) must jointly certify the metropolitan transportation planning process in Transportation Management Areas (TMA) at least every four years.¹ In general, the planning certification reviews consist of three primary activities: review of planning products (in advance of and during the site visit), a site visit, and preparation of a report that summarizes the review and presents findings. The reviews focus on compliance with Federal regulations, challenges, successes, and experiences of the cooperative relationship between the MPO, State DOT and transit operator in the conduct of the metropolitan planning process.

23 CFR 450.328(a) states;

“The FHWA and the FTA shall jointly find that each metropolitan TIP is consistent with the metropolitan transportation plan produced by the continuing and comprehensive transportation process carried on cooperatively by the MPO(s), the State(s), and the public transportation operator(s) in accordance with 23 U.S.C. 134 and 49 U.S.C. 5303. This finding shall be based on the self-certification statement submitted by the State and MPO under Sec. 450.334, a review of the metropolitan transportation plan by the FHWA and the FTA, and upon other reviews as deemed necessary by the FHWA and the FTA.”

INDOT and IMPO are able to utilize the documentation from this review to affirm the required USDOT planning certification is current, and to support the self-certification statement that must be included with the next IMPO 4-year Transportation Improvement Program (TIP). Please include a status regarding resolution of corrective actions and implementation of recommendations in the INDOT-IMPO self-certification documentation.

¹ A TMA is an urbanized area, as defined by the U.S. Census, with a population of over 200,000. There are 153 TMA's in the U.S. based on the 2000 Census.

Scope and Methodology

This certification review focuses on compliance with Federal regulations, challenges, successes, and experiences of the cooperative relationship between the IMPO, INDOT, and IndyGo in the conduct of the metropolitan planning process. This planning review is only one of several methods used to assess the quality and compliance of the IMPO's metropolitan planning process. Other activities provide both FHWA and FTA an opportunity to comment on the planning process, including routine attendance at Policy/Technical committee meetings, and USDOT approval of the IMPO unified planning work program (UPWP), and USDOT issuance of the air quality conformity finding for the metropolitan transportation plan (MTP) and TIP. While the planning certification review report itself may not fully document those many intermediate and ongoing checkpoints, the "Findings" of the certification review, in fact, are based upon the cumulative findings of the entire review effort.

In preparation for the site visit, a written request was sent to IMPO seeking information on recent and ongoing current planning processes and projects. The MPO provided responses which can be found in Appendix 2. This report provides the regulatory framework, current status, key findings, and recommendations for the following subject areas:

- Metropolitan Planning Organization Structure
- Metropolitan Planning Area Boundaries
- Metropolitan Planning Agreements
- Unified Planning Work Program
- Metropolitan Transportation Plan
- Congestion Management Process
- Transportation Improvement Program
- Annual Listing of Obligated Projects
- Public Involvement and Participation Plan
- Title VI of the Civil Rights Act
- Americans with Disabilities Act
- Intelligent Transportation System Architecture and Standards
- Transit and Multimodal Planning
- Travel Demand Modeling
- Metropolitan Planning Factors
- Freight
- Safety

Team Members

The following individuals participated in the Certification Review:

Reginald Arkell, FTA Region 5
Larry Heil, FHWA Indiana Division
Colleen Smith, FHWA Indiana Division
Jay DuMontelle, FHWA Indiana Division
Bob Tally, FHWA Indiana Division
Steve Smith, Indiana Department of Transportation
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Audra Blasdel, Indiana Department of Transportation
Dwane Myers, Indiana Department of Transportation

FHWA and FTA would like to express our appreciation to the IMPO staff for their thoughtful responses to the advance questionnaire, and to the above individuals for their contributions to the review.

Observations and Findings

Each section follows the following format:

1. The statutory requirement is given for the basis of each element,
2. A summary of the current status based on ongoing contacts, review of planning products throughout the year, input provided in the discussions with the staff, and
3. Findings of the review team on the adequacy of the process, and corrective actions, recommendations, and commendations as appropriate.

METROPOLITAN PLANNING ORGANIZATION STRUCTURE

Requirement: The metropolitan planning organization shall be designated per 23 CFR 450.310(b) *by agreement between the Governor and units of general purpose local government that together represent at least 75 percent of the affected population (including the largest incorporated city, based on population, as named by the Bureau of the Census) or in accordance with procedures established by applicable State or local law.*

Status: MPO plans and recommendations are developed in cooperation with the Indianapolis Regional Transportation Council (IRTC). The IRTC is composed of a Policy Committee and a Technical Committee, both of which meet on a quarterly basis. The IRTC also includes a new Administrative Committee that will consist of five (5) members from the IRTC, including the Chair of the Policy Committee.

The IRTC Policy Committee consists of the elected and appointed policy officials of local governments and public agencies within the Indianapolis MPA. The IRTC Technical Committee consists of planners and engineers from local governments and public agencies within the MPA. The officers of the IRTC Policy Committee consist of a Chair and a Vice-chair who are elected annually from the eligible voting members.

MPO plans and recommendations are first endorsed by the IRTC Technical Committee before going to the IRTC Policy Committee for final approval. Only items pertaining to the MPO's budget and other fiscal matters such as consultant contracts are presented to the Metropolitan Development Commission (MDC) for adoption subsequent to being approved by the Policy Committee.

Each LPA's highest elected/appointed official(s) shall designate the IRTC representative for that LPA. Representatives shall remain as members until a successor has been named by the LPA. Use of a proxy is allowed but must be communicated in writing before each Policy Committee meeting.

The IRTC includes the following:

Local Public Agencies (LPAs)-

Town of Atlanta

Town of Arcadia

City of Indianapolis

City of Lawrence

Town of Avon	Marion County
Town of Bargersville	Morgan County
City of Beech Grove	Town of McCordsville
Boone County	Town of Mooresville
Town of Brooklyn	Town of New Palestine
Town of Brownsburg	Town of New Whiteland
City of Carmel	City of Noblesville
Town of Cicero	Town of Pittsboro
Town of Cumberland	Town of Plainfield
Town of Danville	Town of Speedway
Town of Fishers	Shelby County
City of Franklin	City of Southport
City of Greenwood	City of Westfield
Hamilton County	Town of Whiteland
Hancock County	Town of Whitestown
Hendricks County	Town of Zionsville

Public Agencies-

Indiana Department of Transportation (INDOT)
 Indianapolis Airport Authority
 Indianapolis Public Transportation Corp. (IndyGo)
 Central Indiana Regional Transportation Authority (CIRTA)

Exofficio Non-voting Agencies-

U.S. Federal Highway Administration (FHWA)
 U.S. Federal Transit Administration (FTA)
 U.S. Environmental Protection Agency (EPA)
 Indiana Department of Environmental Management (IDEM)

Of the thirty-five cities, towns and counties in the Indianapolis UZA, four implementing agencies recently declared that they are not interested in participating in the transportation planning process. Those local public agencies are the towns of Atlanta, Arcadia, New Whiteland and Whiteland.

The IMPO created a Task Group in 2009 to update the Bylaws to focus all transportation decision-making authority at the Policy Committee level and to incorporate a requirement that member jurisdictions contribute their proportionate share of local matching funds to support a sound transportation planning process. The MPA was also updated by joint agreement between the Madison County Council of Governments (MCCOG), Columbus Area Metropolitan Planning Organization (CAMPO) and IMPO. The updates clarified the MPA boundary between MCCOG and IMPO. The MPA border between IMPO and CAMPO was updated to the Bartholomew County line. The purpose of this change was to simplify the conformity consultation process and allow Johnson and Shelby County Policy and Tech members to participate in one MPO planning process rather than two.

The respective MPOs forwarded requests to the Governor, formally requesting approval of the updated MPAs. IMPO also requested designation of the Indianapolis Department of Metropolitan Development as the MPO. INDOT Commissioner Michael B. Cline (delegated signature authority on behalf of Governor Mitch Daniels) formally approved the requests. The CAMPO approval letter is dated July 28, 2010, and the IMPO and MCCOG approval letters are dated August 4, 2010. IMPO and INDOT plan to update the Planning Agreement to reflect the new MPO designation and clarify planning roles and responsibilities if the Anderson and Indianapolis UZAs become one large UZA after the 2010 Census.

Finding: The review team finds the MPO is in compliance with the requirements of 23 CFR 450.310(b). Previous concerns with IMPO not fully utilizing their USDOT planning funds or being understaffed to address USDOT planning requirements have largely been addressed.

Commendation 1 – The updated Bylaws are exemplary, as is the Policy and Procedures Manual that is posted on the MPO website at http://www.indympo.org/About/Documents/MPO_Policy_and_Procedure_Manual_2010.pdf. These documents provide members with a quick easy source of information so they can fully participate and benefit from regional planning and programming. The requirement that member jurisdictions contribute their proportionate share of local planning matching funds allows the MPO to fully utilize the USDOT planning funds to support a sound transportation planning process.

METROPOLITAN PLANNING AREA

Requirement: 23 CFR 450.312(a) states;

“The boundaries of a metropolitan planning area (MPA) shall be determined by agreement between the MPO and the Governor. At a minimum, the MPA boundaries shall encompass the entire existing urbanized area (as defined by the Bureau of the Census) plus the contiguous area expected to become urbanized within a 20-year forecast period for the metropolitan transportation plan.”

Status: Both the urban area boundary (UAB) and MPA have been updated to reflect changes since the 2000 Census. As noted above, the MPO forwarded a letter to the Governor dated February 24, 2010, formally requesting approval of the updated MPA. INDOT Commissioner Michael B. Cline (delegated signature authority on behalf of Governor Mitch Daniels) formally approved the request by letter dated August 4, 2010.

Finding: The UAB and MPO have been updated to reflect the 2000 Census, and approved as required by regulation. The locations of the UAB and MPA may need to be reevaluated after the 2010 Census if the UZA expands beyond the previously approved boundaries.

METROPOLITAN PLANNING AGREEMENTS

Requirement: 23 CFR 450.314 states;

“(a) The MPO, the State(s), and the public transportation operator(s) shall cooperatively determine their mutual responsibilities in carrying out the metropolitan transportation planning process. These responsibilities shall be clearly identified in written agreements among the MPO, the State(s), and the public transportation operator(s) serving the MPA. To the extent possible, a single agreement between all responsible parties should be developed. The written agreement(s) shall include specific provisions for cooperatively developing and sharing information related to the development of financial plans that support the metropolitan transportation plan (see Sec. 450.322) and the metropolitan TIP (see Sec. 450.324) and development of the annual listing of obligated projects (see Sec. 450.332).

(b) If the MPA does not include the entire nonattainment or maintenance area, there shall be a written agreement among the State department of transportation, State air quality agency, affected local agencies, and the MPO describing the process for cooperative planning and analysis of all projects outside the MPA within the nonattainment or maintenance area. The agreement must also indicate how the total transportation-related emissions for the nonattainment or maintenance area, including areas outside the MPA, will be treated for the purposes of determining conformity in accordance with the EPA's transportation conformity rule (40 CFR part 93). The agreement shall address policy mechanisms for resolving conflicts concerning transportation-related emissions that may arise between the MPA and the portion of the nonattainment or maintenance area outside the MPA.

(c) In nonattainment or maintenance areas, if the MPO is not the designated agency for air quality planning under section 174 of the Clean Air Act (42 U.S.C. 7504), there shall be a written agreement between the MPO and the designated air quality planning agency describing their respective roles and responsibilities for air quality related transportation planning.

(d) If more than one MPO has been designated to serve an urbanized area, there shall be a written agreement among the MPOs, the State(s), and the public transportation operator(s) describing how the metropolitan transportation planning processes will be coordinated to assure the development of consistent metropolitan transportation plans and TIPs across the MPA boundaries, particularly in cases in which a proposed

transportation investment extends across the boundaries of more than one MPA. If any part of the urbanized area is a nonattainment or maintenance area, the agreement also shall include State and local air quality agencies. The metropolitan transportation planning processes for affected MPOs should, to the maximum extent possible, reflect coordinated data collection, analysis, and planning assumptions across the MPAs. Alternatively, a single metropolitan transportation plan and/or TIP for the entire urbanized area may be developed jointly by the MPOs in cooperation with their respective planning partners. Coordination efforts and outcomes shall be documented in subsequent transmittals of the UPWP and other planning products, including the metropolitan transportation plan and TIP, to the State(s), the FHWA, and the FTA. [(e) is not included in this reference because it refers to situations where two or more States share a common MPO, such as in the case of Cincinnati, Ohio or Louisville, Kentucky.]

(f) If part of an urbanized area that has been designated as a TMA overlaps into an adjacent MPA serving an urbanized area that is not designated as a TMA, the adjacent urbanized area shall not be treated as a TMA. However, a written agreement shall be established between the MPOs with MPA boundaries including a portion of the TMA, which clearly identifies the roles and responsibilities of each MPO in meeting specific TMA requirements (e.g., congestion management process, Surface Transportation Program funds suballocated to the urbanized area over 200,000 population, and project selection)."

Status: A cooperative planning agreement between the IMPO, INDOT, Indianapolis Metropolitan Planning Commission, and Indianapolis Public Transportation Corporation (IPTC/IndyGo) was approved January 23, 2008. IMPO and INDOT plan to update the Planning Agreement to reflect the new MPO designation and clarify planning roles and responsibilities if the Anderson and Indianapolis UZAs become one large UZA after the 2010 Census.

IDEM submitted the Indiana Conformity Consultation State Implementation Plan to USEPA (see <http://www.in.gov/idem/4658.htm#state-trans> , under Conformity Consultation) thereby addressing both the USDOT and USEPA for such an agreement. The Memorandum of Understanding between the USEPA, USDOT, IDEM, and INDOT at http://www.in.gov/idem/files/redes_statewide_transport_redes_apndx_a.pdf , and the IMPO Resolution No. 09-T-009, dated March 4, 2009 at http://www.in.gov/idem/files/redes_statewide_transport_redes_apndx_e.pdf , detail the respective agency roles and responsibilities.

Finding: The review team finds that the IMPO agreements are substantially in compliance with applicable regulations.

Recommendation 1 – The IMPO Planning MOU should be updated to reflect the redesignation of the Indianapolis Department of Metropolitan Development as the MPO. The update can also clarify that IMPO is the planning and programming lead for the portion of the Anderson UZA within Hamilton County and the portion of the Columbus UZA within Johnson and Shelby Counties. The revisions can also clarify roles and responsibilities should the Indianapolis and Anderson UZAs grow together pursuant to the 2010 Census and 23 CFR 450.314(d) & (f).

UNIFIED PLANNING WORK PROGRAM

Requirement: 23 CFR 450.308(b) states;

“Metropolitan transportation planning activities performed with funds provided under title 23 U.S.C. and title 49 U.S.C. Chapter 53 shall be documented in a unified planning work program (UPWP) or simplified statement of work in accordance with the provisions of this section and 23 CFR Part 420.”

Status: IMPO’s UPWP consistently describes the metropolitan planning priorities and describes all activities in sufficient detail.

The Annual IMPO Retreat is utilized to engage Policy and Technical Committee members in key decision-making activities, such as setting goals and objectives and developing planning strategies. Since 2005, UPWP activities have been developed, selected, and prioritized in accordance with the Strategic Plan and cooperation with the IRTC, INDOT, FHWA, FTA, City of Indianapolis, and other affected stakeholders. Although the Strategic Plan’s last year was technically 2009, recommendations from the Plan are still being used as the basis for UPWP selections. An update of the Strategic Plan is anticipated in 2011.

Transit and bicycle-pedestrian activities have historically been given high weight for UPWP studies and plans; beginning in 2010, the MPO has begun to emphasize freight. It is expected that a freight consultation committee will result from 2010 activities.

The IMPO CY 2009-2010 UPWP was reviewed and approved by USDOT initially on December 16, 2008, and the CY 2010 supplement was approved on December 7, 2009. Anticipated results, previous accomplishments, and budgets for each activity are included. IMPO posted their UPWP on the IMPO website at <http://www.indympo.org/About/Pages/work-program.aspx> , which is encouraged, for increased transparency regarding IMPO’s transportation planning products and services.

Finding: The review team finds the IMPO UPWP meets the federal requirements found in 23 CFR 450.308.

Commendation 2 - The IMPO 2005-2009 Strategic Plan has been particularly effective in allowing the IRTC Policy and Tech representatives to efficiently direct resources to meet the established goals & objectives. Successes in areas such as data collection, update of the travel demand model to support the FTA New Starts Alternatives Analysis, adequate staffing, and an equitable/stable source of local planning matching funds find their roots in this Strategic Plan.

METROPOLITAN TRANSPORTATION PLAN

Requirement: Based upon 23 CFR 450.322, MPOs are required to develop a MTP addressing a minimum twenty-year planning horizon. The plan is required to be consistent with current and forecasted transportation/land use conditions and trends to appropriately project transportation demand of persons and goods.

The MTP is to be fiscally constrained to demonstrate that implementation is feasible based upon reliable funding sources. Beyond the first 10 years of the MTP, the financial plan may reflect aggregate cost ranges/cost bands, as long as the future funding source(s) is reasonably expected to be available to support projected cost ranges/cost bands. The MTP may also include “illustrative projects” that do not satisfy fiscal constraint requirements but can be included to provide for a more complete discussion of future transportation needs.

After December 11, 2007, all amendments and updates to financial information in the MTP are required to be shown in year-of-expenditure amounts, not in current dollars.

The MTP is to be updated every four years in air quality nonattainment and maintenance areas and every five years in air quality attainment areas to ensure its consistency with changes in land-use, demographic, and transportation characteristics.

Status: The current IMPO 2030 Transportation Plan was updated in mid-2009 to address SAFETEA-LU planning requirements. Project costs and schedules were updated and reported in year-of-expenditure dollars, and the conformity finding was issued June 2, 2009. The Plan was amended later that year to incorporate projects using American Recovery and Reinvestment Act (ARRA) funds and the updated conformity finding was issued November 23, 2009.

Between the years of 2000 and 2030, the current MTP assumes that population and employment will decline in the City of Indianapolis/Marion County while regional population and employment will increase about 27 percent and 4 percent, respectively. As with many U.S. cities, this reflects a consistent trend of population and employment moving from the major urban centers and scattering to outlying areas. The MTP selected this scenario rather than other alternatives

as these disbursement trends are expected to continue. Regional per capita vehicle miles traveled (VMT) has either declined or remained fairly constant in recent years but is still up by about 4 percent from 1993 to 2006 (~10,740 to 11,170).² The MTP expects overall VMT in the UZA to increase by about 27 percent or roughly the same as the population growth rate. Accordingly, the MTP predicts increased congestion and travel times.

The MTP includes a 2030 Needs Plan which is an update to the 2020 Needs Plan that was originally developed in 1995 to accommodate expected travel demand. The 2030 Needs Plan consists of cost-constrained and illustrative projects, both of which contain a substantial proportion of expansion activities. Roadway capacity increases are a primary component of the region's methodology to support the MTP's goals which include land use and transportation planning coordination, system efficiency and mobility needs. The implication is that local officials believe that accommodating increased travel demand is a benefit to their community.

Since 1995, MTP highway projects have been selected using separate ranking and rating forms for the criteria below. Each of the categories has performance measures [condensed in parenthesis below] which determine the number of points a project receives. The five categories are weighted based upon a composite of recommendations made by a Study Review Committee, Citizens Advisory Committee, Technical Advisory Committee and IRTC.

- Roadway Service Category [average daily traffic (ADT), vehicle/capacity (V/C) ratio];
- Transportation Preservation/Improvement/Enhancement Category [promotes system continuity; expansion rather than new construction; address physical deficiency; project in process, and; costs for land/improvement];
- Environmental Category [noise/air quality/wetland impacts];
- Multimodal Benefits Category [promotes alternative modes and accessibility to them/pedestrian and bike, and; reduces SOV travel];
- Community Impacts Category [consistent with land use plans, historical/open space impacts, and job access].

An unprecedented level of effort has gone into the new 2035 Transportation Plan (locally referred to as Indy-Connect; see <http://indyconnect.org/>) that is expected to be completed by the end of CY2010. Efforts have been underway since 2005 to collect updated data and to refine the travel demand model for the Northeast Corridor Alternatives Analysis/Draft environmental Impact Statement (AA/DEIS). The 2035 Transportation Plan will revise the current performance measure-based project prioritization process.

² Based upon VMT data from the Indiana Department of Transportation and Census Bureau population estimates.

Performance measurement data will be used for the 2035 Transportation Plan to help analyze conditions at both the “sub-area” or corridor level and the project specific level. The new Plan will reflect a number of changes to the highway project evaluation process. This includes movement of the CMP and multimodal components to the post-highway project prioritization process. The tentative “sub-area” level metrics are listed below. Each of these is weighted to score and rank corridors for project prioritization purposes.

- Overall volume over capacity ratios averaged for all official Thoroughfare Plan roadway segments based on AM and PM peak period traffic counts and existing roadway capacity information;
- Crash data, including all fatal accidents and those involving injuries;
- Inter-corridor connectivity – measuring the balance between travel demand and route directness between adjacent sub-areas;
- Intra-corridor connectivity – showing balance between travel demand and route directness within individual sub-areas;
- Significance to Freight Mobility – based on percentage of land area within each sub-area devoted to freight related uses – such as warehousing, distribution, manufacturing and agricultural storage and shipping.
- Economic Activity – population and employment

At the project level, tentative weighted performance measures to be used are listed below.

- Aforementioned Corridor Scores;
- Delay savings;
- Land use intensity – to rank current and forecasted land uses based on economic development impacts in the following order from highest to lowest: office, industrial, commercial, residential, and agricultural;
- Industry cluster support – employers in key local industries near the project: life sciences; transportation, distribution, logistics; advanced manufacturing, clean-tech energy; information technology, and; motorsports.

The MPO anticipates that cost efficiency for each highway project to be included in the 2035 Transportation Plan will be calculated using the project level score divided by the federal portion of project construction costs. Projects will then be placed in tiers of high, medium and low priority.

In 2009, the MPO collaborated with a coalition consisting of the Central Indiana Corporate Partnership, the Central Indiana Community Foundation, the Central Indiana Chamber of Commerce, IndyGo, and the CIRTA to conduct a cost-benefit-based analysis of existing and potential transportation plans. The coalition, named the “Central Indiana Transit Task Force”, made several plan recommendations that are being investigated as part of the Indy Connect process. An extensive operations analysis of the transit system has been completed, and both near-term and long-term strategies are expected to be incorporated into the 2035 Transportation Plan. The Task Force is considering a

wide range of potential funding sources, and is expected to advance a ballot initiative in the Fall of 2011 to seek financial support from the local community.

HERS-ST (State level version of FHWA Model used to project highway needs nationally) is being used to estimate preservation needs for the region, both for highways and bridges, so adequate funds are put aside to support these needs. Given the projected needs, it is reasonable to conclude that a significantly increased share of available revenues will be focused on preservation and fewer funds will be available for added capacity. IMPO developed a pavement management system and a Pavement Serviceability Index (PSI) factor for all Federal-aid eligible roadways. This is a significant achievement and positions IMPO to optimize pavement preservation project investments in the future. The PSI is currently used to prioritize TIP pavement preservation projects. It also has the potential to identify preventive maintenance treatments that could optimize the life cycle cost of pavements throughout the region.

Per 23 CFR 450.322(g), the MPO is evaluating environmental resource layers and engaged in consultation with resource agencies to identify potential management strategies for inclusion in the 2035 Transportation Plan. The NE Corridor AA/DEIS includes extensive outreach to both the public and resource agencies before a preferred alternative is amended as a committed project into the 2035 fiscally constrained conforming Transportation Plan. A Tier 1 EIS was developed for I-69 between Indianapolis and Evansville before that project was amended into the respective MPO Transportation Plans. These types of detailed alternatives analyses prior to commitment to a preferred alternative achieve the goal of linking the planning and NEPA processes as outlined in 23 CFR 450, Appendix A, prior to identifying the preferred alternative for a major investment.

Finding: The review team finds that the IMPO 2030 Transportation Plan meets the federal requirements of 23 CFR 450.322 for the development and content of the metropolitan transportation plan.

An assumption in the LRTP is that past trends of population disbursement will continue. This is an intergovernmental policy and decision that has major financial connotations, particularly for transportation. It is unclear why this scenario was chosen or how much consideration was given to other land use alternatives. The appearance is that IMPO's role is primarily to expand roadways to accommodate increased travel demand brought about by outward growth and development.

It is understood that IMPO does not control land use. However, the MPO is made up of representatives from municipalities and counties responsible for land use planning throughout the region. IMPO should be able to facilitate improved transportation system efficiency through land use coordination with its planning partners.

Recommendation 2: IMPO should consider, analyze and document alternative land use scenarios in the 2035 Transportation Plan. This could be comparable to the way road and transit network alternatives are often evaluated before selecting a final transportation scenario. The land use alternatives could be assessed using cost-benefit analyses and other assumptions documented as part of the planning process. Ultimately, IMPO could quantify expected improvements to transportation system modal balance, transit usage, and overall socioeconomic conditions based upon various future growth scenarios. See the resources below and the suggested performance measures in the Planning Factors section.

Any such adopted strategies should be implemented through intergovernmental agreements documenting the pricing and growth strategies. It is also recommended that the CMP implement growth management policies through intergovernmental agreements with local municipalities and counties. The agreements would be pursuant to revised local land use plans, zoning codes and subdivision regulations. These documents as a whole should demonstrate commitment to quantified reductions in travel demand using performance measures such as those in the Planning Factors section.

- ***Designing Walkable Urban Thoroughfares: A Context Sensitive Approach***, An Institute for Traffic Engineers and Congress for the New Urbanism Guidebook
<http://www.ite.org/emodules/scriptcontent/Orders/ProductDetail.cfm?pc=RP-036A-E>
- ***Is That a Good Assumption?*** American Planning Association article: <http://www.planning.org/planning/2007/jan/assumption.htm>
- ***Land Use-Transportation Scenarios and Future Vehicle Travel and Land Consumption***, Journal of the American Planning Association study
http://faculty.arch.utah.edu/bartholomew/JAPA_SP_Article.pdf
- ***Chapter 15, Land Use and Site Design, Transit Cooperative Research Program, Report 95***, sponsored by FTA
http://onlinepubs.trb.org/onlinepubs/tcrp/tcrp_rpt_95c15.pdf.
- ***FHWA Web Site, Scenario Planning resources***
<http://www.fhwa.dot.gov/Planning/scenplan/index.htm>
- ***Summary of Analysis Strategies for Measuring Regional Transportation Related Impacts of Growth Management and Land Use Strategies*** <http://www.fhwa.dot.gov/tcsp/asistudy.html>

Commendation 3 – USDOT applauds the unprecedented level of effort and public outreach that the MPO is applying in support of the 2035 Transportation Plan update and associated Indy-Connect initiative. The public-private leadership being provided by the MPO, Indy-GO, CIRT, and the Central Indiana Transit Task Force are essential to garner the local support and additional resources needed to support improved transportation for the region as a whole.

Recommendation 3 – USDOT commends the MPO for developing a pavement management system for the MPA and for using the PSI as a primary metric in the TIP prioritization of pavement preservation projects. USDOT encourages the MPO to utilize the tool to identify and prioritize pavement preventive maintenance projects. By identifying the optimal investment strategy and implementing it at the right time, the life cycle cost of the pavement can be optimized. We encourage IMPO to meet with INDOT and FHWA pavement specialists to explore this approach and whether Federal-aid funds can be used for such pavement management strategies as they are on the INDOT jurisdiction system.

CONGESTION MANGEMENT PROCESS

Requirement: 23 CFR 450.320(e) states, “*In TMAs designated as nonattainment for ozone or carbon monoxide, the congestion management process shall provide an appropriate analysis of reasonable (including multimodal) travel demand reduction and operational management strategies for the corridor in which a project that will result in a significant increase in capacity for SOVs (as described in paragraph (d) of this section) is proposed to be advanced with Federal funds. If the analysis demonstrates that travel demand reduction and operational management strategies cannot fully satisfy the need for additional capacity in the corridor and additional SOV capacity is warranted, then the congestion management process shall identify all reasonable strategies to manage the SOV facility safely and effectively (or to facilitate its management in the future). Other travel demand reduction and operational management strategies appropriate for the corridor, but not appropriate for incorporation into the SOV facility itself, shall also be identified through the congestion management process. All identified reasonable travel demand reduction and operational management strategies shall be incorporated into the SOV project or committed to by the State and MPO for implementation.*”

Status: The most recent CMP document, completed in December 2007, outlines how TDM and operational strategies are included in all project development and planning processes. These techniques are required to be considered when proposed MTP amendments are made for roadway expansions and other solutions to congestion. Quantified analysis is performed to determine the extent that the strategies will be beneficial. Various performance measures

are used for state highways, local roads, transit and air quality. These metrics include level of service (LOS), annual volume, intersection delay, incident management coverage, number of crashes, and number of exceedances for emissions. The analysis considers performance without the project compared to any predicted improvements from the various strategies. Qualitative analysis is performed on projects relating to the following elements: established bicycle/pedestrian/transit corridor; freight priority corridor; safety improvements; environmental justice; and historic districts. The MPO completes a worksheet for each project level review to determine whether the project and/or alternate strategies will be added to the MTP.

Operational recommendations and sub-corridor studies have resulted in projects for traffic signal coordination, access management, freeway incident detection and management, and advanced traveler information systems. Demand management recommendations have included promotion/funding of Central Indiana Commuter Services (CICS; carpooling), bicycling and pedestrian facilities, express commuter bus services, and design guidelines for transportation and land use planning to encourage more pedestrian-oriented development.

The CMP is a continuously evolving process. IMPO is currently revamping the CMP as an integral part of the 2035 MTP update. Information learned through performance measures about the most effective or less effective strategies will be taken into account through regular updates to the process. Currently, project selection takes place before consideration is given to TCM/TDM methodologies.

The MPO works closely with INDOT officials to track congestion issues on roadways under State jurisdiction. Traffic count and V/C ratios for INDOT highways are maintained along with INDOT recommended congestion relief strategies. ITS tools are in place on INDOT controlled highways, providing continuous feedback on traffic levels and congestion issues. INDOT oversees these ITS deployments – and the MPO gathers information gathered through these systems from INDOT.

Finding: The CMP has been established and integrated into the transportation planning process through the aforementioned documents and planning activities. The CMP identifies and evaluates a number of techniques for consideration to relieve congestion and maximize the safety and mobility of people and goods. However, IMPOs current practice of integrating the CMP into planning after project selection is less than optimal. As a result, roadway capacity expansions and new road construction may be occurring when more cost effective alternatives are available. The recommendations below are provided to enhance compliance with 23 CFR 450.320 and improve coordination of the CMP with operational and management strategies.

Recommendation 4 – USDOT encourages IMPO to adopt a Complete Streets Policy as part of the 2035 MTP update to accommodate non-vehicular modes for all road projects. The policy could include a clause to exempt a project given certain circumstances.

Recommendation 5 - It is recommended that IMPO and INDOT evaluate and integrate into the CMP more aggressive TDM strategies to reduce the demand for SOV transport and overall travel. Strategies such as growth management and corridor-level congestion pricing in addition to system-wide VMT and fuel pricing should be fully vetted. Documentation should be developed to provide transparency regarding implementation challenges.

IMPO should demonstrate potential benefits using known elasticities on the effects of pricing and land use design on VMT and transit ridership in addition to walking and bicycling. Consideration for roadway capacity expansion projects should take place after implementation of a growth management and/or pricing strategy in addition to other demand reduction strategies. Innovative methods have the potential to enhance selection by FTA of the Northeast Corridor fixed guideway project into preliminary engineering.

See the resources below and in the Metropolitan Transportation Plan section above in addition to the suggested performance measures in the Planning Factors section.

- **FHWA Tolling and Pricing Program** web site for strategies and resources to increase economic efficiency
http://ops.fhwa.dot.gov/tolling_pricing/value_pricing/publications.htm.
- ***Travel and the Built Environment***, Journal of the American Planning Association study:
<http://www.informaworld.com/smpp/ftinterface~db=all~content=a922131982~fulltext=713240928>

TRANSPORTATION IMPROVEMENT PROGRAM

Requirement: 23 CFR 450.324 requires the MPO to develop a TIP in cooperation with State and public transit operators. Federal legislation also requires that an MPO cooperatively develop a TIP consistent with the MTP and that it be financially constrained. Effective December, 2007, cost and revenue estimates must be produced in “year of expenditure dollars” to reflect the time-based value of money.

The TIP must cover at least a four-year program of projects and must be updated at least every four years. The TIP must list all projects in sufficient detail as outlined in the regulations. The TIP must reflect public participation and identify the criteria for prioritizing projects. The MPO must have an approved process for making changes to the TIP.

FHWA and FTA must jointly find the TIP to be based on a continuing, comprehensive, and cooperative transportation planning process. Only after an MPO TIP is amended into the Statewide Transportation Improvement Program (STIP), can federal funds be authorized for projects.

Status: The IMPO FY 2009-2012 TIP was adopted September 17, 2008. The initial USDOT Conformity Finding was issued on September 19, 2008, and has been amended several times. The IMPO FY 2009-2012 TIP, as amended, was incorporated most recently into the FY 2010-2013 STIP by letter dated January 13, 2010. IMPO is currently updating the TIP, and it is expected that it will be incorporated into the SFY 2012-2015 STIP on or about the beginning of SFY 2012 (July 1, 2011). The MPO is addressing the new requirement that the TIP list *“estimated total project cost, which may extend beyond the four years of the TIP”*, per 23 CFR 450.324(e)(2).

The IMPO TIP and associated amendments can be found on the IMPO website at <http://www.indympo.org/Funding/IRTIP/Pages/home.aspx>. The IMPO Policy & Procedures Manual at http://www.indympo.org/About/Documents/MPO_Policy_and_Procedure_Manual_2010.pdf outlines the performance measure driven project selection process. The Manual also describes in detail the process for review and approval of TIP amendments and administrative modifications. These procedures were updated recently to address member jurisdiction concerns and are being used to support the current TIP update.

With the preparation of the current 2009-2012 TIP, the MPO began an effort to improve the visual presentation of the program. Color photos and graphs, as well as a more reader friendly format were employed to help improve the presentation. In addition, the entire color version of the TIP is now available on the MPO's improved website. Within the next year, the MPO plans to employ an enhanced TIP application that will allow the public and the LPAs to access detailed project information from a web based Google map.

Sponsors are required to complete a Project Application Form for each proposed activity to be added to the TIP. These forms are used as a guide for TIP project selection. Each of the proposals is categorized under one of ten project categories and rated using a scoring system with a maximum of 85 points possible. A second component evaluates the project based on environmental and community impacts with a maximum possible score of 50. The application

requires an indication whether it should be evaluated pursuant to the CMP criteria for roadway expansion and new road construction projects.

For three of the ten project categories, the IRTIP includes project selection criteria that address Title VI guidelines of providing multi-modal access and mobility. These categories are Transit Enhancement, Bicycle and Multi-Use Enhancement, and Pedestrian Enhancement.

Finding: The IMPO FY 2009-2012 TIP fully addresses all of the SAFETEA-LU requirements and is included in the Indiana FY 2010-2013 STIP.

Recommendation 6 – The Indianapolis MPO is reminded that the next TIP must address the new federal requirement that a TIP list *“estimated total project cost, which may extend beyond the four years of the TIP”*. This keeps elected officials informed of the total project cost, even when the current TIP may only include the initial phases of preliminary engineering, right-of-way, or construction.

Recommendation 7 –The Indianapolis MPO did an excellent job of tracking implementation of ARRA projects. USDOT encourages IMPO to implement a similar process on a quarterly basis for all other projects. The INDOT Local Public Agency (LPA) Project Development Process requires each project sponsor to have an employee in responsible charge (ERC) that has completed LPA certification training. IMPO can assist project sponsors by monitoring their funding and project development. IMPO can also help to ensure they maintain a certified ERC, as required by the State’s new federal-aid LPA Project Development Procedures.

Recommendation 8 – It is recommended that IMPO modify the TIP amendment procedures to allow the IMPO Executive Director to approve minor TIP amendments for exempt projects where public involvement on the overall project has already taken place. Examples include projects where CN is already programmed in the TIP, but the PE or ROW phase were overlooked. Another example is where a new TIP has been approved, but a project in the previous TIP had not been advanced to authorization and now needs to be amended into the new TIP. The process should include notification of the Policy Committee that the administrative TIP amendment was approved, so they are aware of the correction.

ANNUAL LISTING OF OBLIGATED PROJECTS

Requirement: 23 CFR 450.332 requires the State, the MPO and public transportation operators to cooperatively develop a listing of projects for which Federal funds under 23 USC or 49 USC Chapter 53 have been obligated in the previous program year. The listing must be completed within calendar 90 days

following the end of the program year and include all federally funded projects authorized or revised to increase obligations in the preceding program year. At a minimum, the following shall be made available in the listing for each project:

- The amount of funds requested in the TIP
- Federal funding obligated during the preceding year
- Federal funding remaining and available for subsequent years
- Sufficient description to identify the project or phase
- Identification of the agencies responsible for carrying out the project or phase

Status: IMPO published the FY 2006-2008 lists on their website at <http://www.indympo.org/Funding/IRTIP/Pages/home.aspx> . IMPO has had problems securing the necessary list of authorization from INDOT for 2009 and 2010, and thus failed to post the 2009-2010 Annual Lists of Obligated Projects.

Finding: The 2006-2008 Listing of Obligated Projects posted on the IMPO website does not contain transit projects. The 2009 and 2010 listings were not published within 90 days of the end of the program year. FHWA requests that INDOT work jointly with IMPO to finalize the 2009-2011 Listing of Obligated Projects and post them on the IMPO website by September 30, 2011.

Corrective Action 1 - IMPO and INDOT must add awarded transit projects to the 2006-2008 Listing of Obligated Projects, develop the 2009-2011 Listing of Obligated Projects and post them on the IMPO website by September 30, 2011.

PUBLIC INVOLVEMENT AND PARTICIPATION PLAN

Requirement: 23 CFR 450.316 set forth the primary requirements for public involvement. Public involvement in connection with the MTP is specifically addressed in 23 CFR 450.322 (g) (1) (2), (i), and (j) and specifically for the TIP in 23 CFR 450.324 (b).

Status: The IMPO Public Participation Plan (PPP) was updated in February 2010 and can be viewed on the MPO website at http://www.indympo.org/News/Documents/PIP_Final_2010.pdf. The MPO did a good job of incorporating revisions based on comments received during the 45-day public comment period. The update is easy to understand, clear regarding the duration of public comment periods, and appropriately provides an expedited process for amendments.

As noted previously, IMPO has done an outstaying job with public outreach as part of the IndyConnect 2035 Metropolitan Transportation Plan update. The level and breadth of outreach is exemplary, and IMPO received a Meritorious Award at

the Indiana Metropolitan Planning Organization Conference on September 14, 2010

Public notices were issued by USDOT to seek public input regarding how the Indianapolis transportation planning process might be improved (see Appendix 4). Four individuals comment by e-mail, but nobody attended the September 21, 2010 6 pm Public Hearing in Room 107 of the City-County Building. One member of the Tech Committee commented, "They work really hard to be inclusive of everyone in their decision making. Also, they are very helpful with questions. The main thing our MPO does well is trying hard to pick the most deserving projects, yet giving everyone a chance to be included in getting funding for jobs. We seem to get the money spent without big arguments." The other three comments involving design elements of the City of Indianapolis HARMONI transportation enhancement (TE) project. These comments were e-mailed to Andy Lutz of the City of Indianapolis for consideration as they finalize the design of the HARMONI project.

Finding: The review team finds the MPO's PPP meets the requirements of 23 CFR 450.316.

TITLE VI OF THE CIVIL RIGHTS ACT

Requirement: Title VI of the Civil Rights Act of 1964 states:

"No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or subjected to discrimination under any program or activity receiving Federal financial assistance."

Title VI bars intentional discrimination as well as disparate impact discrimination (e.g., neutral policy or practice that has the effect of a disparate impact on protected groups).

From FHWA Memorandum subject Clarification of FHWA's Oversight Role in Accessibility dated Sep 9, 2006 from Frederick D. Isler, Associate Administrator for Civil Rights

Title 23 further requires FHWA and FTA to certify that the "planning process . . . is being conducted in accordance with all applicable requirements of . . . Title VI of the Civil Rights Act of 1964 and the Title VI assurance executed by each State under 23 U.S.C 324 and 29 U.S.C. 794." The Title VI assurance executed by each State adds sex and physical handicap to characteristics protected against discrimination.

Executive Order 12898, issued in 1994, further amplifies Title VI by providing that:

“[E]ach Federal agency shall make achieving Environmental Justice part of its mission by identifying and addressing as appropriate, disproportionately high and adverse human health and environmental effects of its programs, policies, and activities on minority populations and low-income populations.”

In compliance with Executive Order 12898, the US DOT Order on Environmental Justice was issued in 1997. Furthermore, 23 CFR 450.316(a)(1)(vii), transportation planners are required to seek out and consider the needs of those traditionally underserved by existing transportation systems, such as low-income and minority households that may face challenges accessing employment and other services.

For the purposes of the certification review, the products of the planning process must reflect compliance with this Act.

Status: The IMPO website includes a description of the MPO Environmental Justice (see <http://www.indympo.org/About/GetInvolved/Pages/justice.aspx>), Title VI (see <http://www.indympo.org/About/GetInvolved/Pages/title-vi.aspx>), and School Outreach Initiatives (see <http://www.indympo.org/About/GetInvolved/Pages/SchoolInvolvementProgram.aspx>).

Population data was gathered by block group for individuals who fell below the poverty line in the 2000 U.S. Census, as determined by the U.S. Census Bureau’s calculation of the poverty level. The greatest concentration of people living in poverty occurs inside the Interstate 465 beltway of Marion County, especially on the near north, east and west sides, but smaller clusters can also be found in Noblesville, Zionsville, southern Johnson and Morgan counties, near Brooklyn and Mooresville, and along Interstate 74 in Shelby County. There also appears to be relatively higher concentrations in Hendricks County along Interstate 74, in Central Johnson County and in northern Hamilton County.

The 2035 Transportation Plan and the Indy Connect outreach meetings included community based organizations such as CDCs, neighborhood associations, and the Indiana Black Expo. The objective is to maximize outreach opportunities by utilizing the communications networks of these organizations to distribute information and make presentations at their meetings.

Between February and April of 2010 over thirty public meetings were held during the first phase of the preparation for the MTP update, with special attention paid to scheduling several meetings in areas of large minority populations. Ten thousand of the fifty thousand brochures detailing pertinent Plan update information and locations of public meetings were printed in Spanish and made available at various locations within Hispanic communities.

Additionally, to further ensure adequate outreach to diverse populations, two transit outreach advisory groups were formed that include the following representatives: Black Expo, the Urban League, Center for Leadership Development, Concerned Clergy, NAACP, 100 Black Men, MLK Multi Service Center, Coalition of 100 Black Women, Martindale Brightwood Community Development Corporation, Indianapolis Black Chamber of Commerce, CIRTA, PB America, Radio One, Hispanic Business Council, La Voz, La Plaza, and Mario Dominguez. These representatives advise IMPO on groups to meet with and how to spread the message to diverse populations. The City of Indianapolis' Mayor's Neighborhood Liaisons are also used to spread the word in Marion County about the Plan update.

Disparate impacts or unintended consequences of transportation projects are determined at the project level, in consultation with project sponsors, consultants, INDOT, and with input from the public as provided by outreach activities. The IMPO has no active or recently resolved Title VI complaints.

There are essentially two important purposes of assurances: 1) they remind prospective recipients of their nondiscrimination obligations, and 2) they provide a basis for the Federal Government to sue to enforce compliance with these statutes

Finding: It was noted on IMPO Title VI Compliant Procedures Manual the following on the bottom of page 2 which is a good practice that needs to be updated to include the word "age" on all their public documents and on the web site.

"In accordance with Title VI of the Civil Rights Act of 1964, the Indianapolis MPO does not discriminate based on race, color, national origin, sex, religion, or disability."

Title VI information given to the general public must include the Title VI and 504 coordinator name, title, phone number and email address.

IMPO needs to create a Title VI Log that identify each complainant by race, color, sex, or national origin; the recipient; the nature of the complaint; the dates the complaint was filed and the investigation completed; the disposition; the date of the disposition; and other pertinent information.

Subject to IMPO addressing the above procedural issues, the review team finds the IMPO meets the federal requirements for Title VI and Executive Order 12898. The planning process supports the conclusion that traditionally underserved populations are not neglected or discriminated against by the MPO directly, its individual members, or collectively by the region.

Recommendation 9 – The MPO should use visual techniques to depict on a map in the MTP where transportation expansion and other significant projects are located in relation to areas with substantial low income and minority residential populations. The graphic should be included with analysis demonstrating that these protected populations receive proportionate benefits and do not receive disproportionate negative impacts from the projects. The analysis should be cognizant of the impacts on racial income disparity over time and racial integration in terms of the Dissimilarity Index (<http://www.census.gov/segregation.html>).

AMERICANS WITH DISABILITIES ACT

Requirement: Public rights-of-way and facilities are required to be accessible to persons with disabilities through the following statutes:

- Section 504 of the Rehabilitation Act of 1973 (29 USC §794) 49 CFR Part 27 and
- Title II of the Americans with Disabilities Act of 1990 (ADA) (42 USC §§ 12131-12164) - 28 CFR Part 35.

These statutes prohibit public agencies from discriminating against persons with disabilities by excluding them from services, programs, or activities. Pedestrian access for persons with disabilities to the agency's streets and sidewalks must be provided, whenever a pedestrian facility exists. FHWA has the responsibility to ensure ADA compliance in the public right-of-way and on projects using surface transportation funds.

The ADA requires public agencies with more than 50 employees to conduct a self-evaluation of their current services, policies, and practices that do not meet ADA requirements. The public agency must then develop a "transition plan," which must include a schedule for providing required accessibility upgrades, including curb ramps for walkways (28 CFR §35.150(d)). ADA Transition Plans should have been completed by January 26, 1992, and the deadline for completing the required accessibility upgrades listed in the transition plan was January 26, 1995. The ADA transition plan and its identified needs should be fully integrated into the MPO's TIP and State DOT's STIP. For more information, see the USDOT Accessibility webpage at the following website: http://www.dot.gov/citizen_services/disability/disability.html .

Status: The Indianapolis Regional Transportation Council's (IRTC) Policy and Technical Committee meetings and other meetings hosted by the MPO are located at venues that purposefully accommodate members of the public with disabilities and that are transit dependent. Additionally, the MPO has a Spanish-speaking employee whom attends all IRTC meetings and other most MPO meetings. If that MPO staff member is not available, the MPO does hire a Spanish interpreter as required.

The City of Indianapolis is under a Court ordered consent decree to address ADA concerns, and so they have become quite proficient in addressing ADA concerns as part of all of their projects, both Federal-aid and locally funded.

Finding: It appears many of the member jurisdictions do not have ADA transition plans in place, and thus are not compliant with these requirements.

Recommendation 10 – IMPO should work jointly with INDOT to clarify the requirements for ADA Transition Plans and jointly develop an enforcement plan within 18 months for all applicable recipients of federal-aid transportation funds.

INTELLIGENT TRANSPORTATION SYSTEM ARCHITECTURE AND STANDARDS

Requirement: Federal requirements for Intelligent Transportation System (ITS) architecture are codified under 23 CFR 940 Intelligent Transportation System Architecture and Standards. ITS projects are required to be consistent with the National ITS Architecture and applicable ITS standards. This is to be accomplished through the development and maintenance of regional ITS architectures and using a systems engineering process during ITS project development.

Status: The review team reviewed the IMPO ITS document on the IMPO website at <http://www.indympo.org/Plans/Pages/intelligent.aspx> and found that it comports with the applicable Federal requirements.

The latest version of the ITS architecture was approved by the IRTC in February 2008. An internal review is scheduled for summer of 2010, in which the document will be examined for consistency with the 2035 Transportation Plan update that is in process. A comprehensive review of the architecture is planned for 2011, once the content of the MTP is known.

A regional committee participated in the development of the architecture, including representatives from the IRTC Technical Committee, local emergency management agencies, state and local police departments, local fire departments, FHWA, and IndyGo.

Finding: The review team finds the IMPO meets the federal ITS architecture requirements.

TRANSIT AND MULTIMODAL PLANNING

Requirement: 23 CFR 450.306 states: Preparation of the coordinated public transit-human services transportation plan (HSTP), as required by 49 USC 5310,

5316, and 5317 should be synchronized and consistent with the metropolitan transportation planning process.

23 CFR 450.318 states: MPOs, States, or public transportation operators may undertake multimodal, systems-level corridor or subarea planning studies as part of the metropolitan planning process. These entities shall collaborate with each other in preparing appropriate NEPA documentation, provide for public review/comment during development of the planning studies, and allow review by FTA and FHWA. Proposed fixed guideway transit projects shall abide by the Alternatives Analysis regulations described at 49 USC 5309(d) and (e) and 49 CFR part 611.

Status: The primary transit operator in the Indianapolis UZA is the Indianapolis Public Transportation Corporation (IndyGo) which was formed in 1973 as a municipal corporation, a component unit of the Consolidated City of Indianapolis-Marion County Government. IndyGo provides fixed route and demand response bus service to a population of almost 800,000 covering 373 square miles in Marion County. IndyGo owns/operates about 235 vehicles seven days per week and employs almost 500 full and part-time workers. The Central Indiana Regional Transportation Authority (CIRTA) is a quasi-governmental organization with a mission to coordinate and improve public transportation throughout the nine-county region. IndyGo and CIRTA work closely with the MPO and Central Indiana Commuter Services (CICS) in addition to numerous on-demand regional and rural transportation providers to achieve this goal.

Transit is facilitated through the 2035 MTP update, Coordinated Human Services Transportation Plan (HSTP), Rural/On-Demand Transit Study, and a Regional Transit Governance Study amongst other efforts. IndyGo is the lead agency and designated recipient for the HSTP, which was initially adopted in 2007 and updated in 2009 pursuant to a regular two-year cycle. The Rural/On-Demand study seeks to improve intercounty accessibility and coordination in the outer regional areas. The Governance Study will provide a roadmap for integration and coordination between CIRTA, IndyGo and other operators to develop fixed guideway transit service in the region if and when a local funding source is established.

A 2009 IndyGo onboard transit survey found that about three-fourths of its riders are from households with incomes of less than \$35,000 per annum. Approximately two-thirds of the riders are African-American although they only make-up about one-fourth of the service area population. About one-half of riders are from households that do not have a vehicle. Walking is the dominant access/egress mode for roughly 9 of 10 riders. Only about 5 percent of riders are from households with incomes of more than \$75,000 per year.

IndyGo is expected to end CY2010 with a balanced budget. However, public hearings have recently been held regarding proposed service cuts and fare

increases due to expected revenue shortfalls in CY2011. Various IndyGo transit statistics from the National Transit Database (NTD) and Indiana Public Transit 2009 Annual Report were analyzed by the review team. The data reviewed consisted of the following performance measures for the period 1999-2009: ridership; farebox recovery rates; trips per vehicle revenue mile; operating subsidies per trip; and operating expenditures per vehicle revenue mile. A synopsis of the analysis is provided in Table 1 and the narrative below.

TABLE 1 - INDIANAPOLIS UZA TRANSIT STATISTICS (1999-2009 RANGES)										
	Ridership (Millions of Riders)	Trend	Farebox Recovery Rate	Trend	Trips Per Revenue Mile	Trend	Operating Subsidies Per Trip	Trend	Operating Exp. Per Vehicle Rev. Mile	Trend
INDYGO	8.46-11.72	Decline	15-26%	Stable	0.74-1.42	Decline	\$1.95-\$5.55	Stable	\$4.00-\$5.90	Stable
Fixed Bus	8.49-11.46	Decline	20-23%	Stable	1.41-1.95	Decline	\$2.13-\$3.42	Stable	\$4.25-\$6.22	Stable
Paratransit	0.23-0.33	Varies	4-8%	Varies	0.09-0.15	Stable	\$21.33-\$33.48	Stable	\$2.45-\$3.27	Stable
<i>National Avg.</i>			31-37%		2.3-2.6		\$1.48-\$2.44		\$6.49-\$8.34	
<i>Fixed Bus</i>			27-30%		2.7-2.8		\$1.68-2.34		\$6.80-\$9.20	
<i>Paratransit</i>			8-11%		0.1-0.2		\$18.37-\$25.56		\$3.10-\$3.90	
<i>Nat. Avg. (UZAs > 1 million pop., all modes)</i>			33-39%				\$1.38-\$1.84			
Notes: 1999-2008 statistics are from the National Transit Database (NTD). 2009 statistics are from the Indiana Public Transit 2009 Annual Report and are not broken out by Fixed Bus and Paratransit. Trends are a subjective determination based upon the year-to-year data. Stable indicates no discernable trend. Rising and Declining trends are indicative of fairly consistent annual changes. Green coloring shows performance generally above the national average or an improvement trend while red depicts performance below the national average or a deteriorating trend.										

IndyGo statistics for the years 1999-2009 show declining fixed route ridership while paratransit patronage has not exhibited any particular trend. While there has been a wide range in overall farebox recovery rates, they have been stable at 17-20 percent for fixed route services during all but two of the years measured. Trips per vehicle revenue mile overall and for fixed route services have been declining while they have been steady for paratransit. Operating subsidies per trip and expenditures per vehicle revenue mile overall and for fixed route service have been stable. Despite these stable trends, fixed route ridership has been historically low when compared to averages for large UZA's with populations of more than 1 million. Consequently, farebox recovery ratios and operating subsidies per trip also compare unfavorably to similarly sized UZA's. Conversely, IndyGo out-performs these other systems in terms of operating expenditures per vehicle revenue mile.

Barriers to improved transit ridership, particularly choice riders, include lack of service frequency/hours and excessive trip lengths that extend beyond the service area. IndyConnect is a concerted effort led by the MPO in coordination with CIRT, the business community, and the public to improve accessibility by planning for regional fixed guideway transit service. This effort is currently focused on an Alternatives Analysis/Draft Environmental Impact Statement (AA/DEIS) for Northeast Corridor service from downtown Indianapolis to Fishers. During about the past 12 years, IMPO has received roughly \$10 million in federal monies administered through INDOT, including Section 5309 earmarks and CMAQ funds to facilitate this planning effort. Stakeholders are working to

establish a permanent local funding source to support implementation of the project and transit operations in general.

The MPO has also recently applied for discretionary funding for an east-west fixed guideway corridor through most of Marion County to the Indianapolis International Airport via downtown Indianapolis. IndyGo is nearing completion of a future service plan known as a Comprehensive Operational Analysis (COA), which will update a similar 2005 study. Many of the COA elements will mirror and complement the IndyConnect initiative and include an enhanced bus system with more than twice the current service levels and premium service. IndyGo recently received earmarked funds for a new transfer center to be built in downtown Indianapolis.

Finding: The final HSTP document was developed through planning activities that included involvement by the appropriate transportation providers, stakeholders, and the public. The plan identifies the transportation providers and outlines details of existing services. The HSTP also evaluates the adequacy of those services for disadvantaged populations and those with special needs. The plan provides strategies or activities concerning how transport deficiencies such as gaps and duplication of services can be addressed. The HSTP provides implementation strategies/priorities and outlines the competitive selection process. The HSTP requirements have been satisfied.

IndyGo, CIRT, and other regional transit-related stakeholders participate in the MPO's planning processes. IndyGo's bus routes are appropriately located in those areas with the highest residential and employment densities. The aforementioned analysis of IndyGo's performance is a significant concern as the City of Indianapolis is the 12th largest in terms of population (UZA is 33rd largest), yet ridership within the UZA ranks 79th.³ One aspect of poor performance is the small mode share captured by transit. Nationally, transit captured about 4.9 and 3.6 percent of work trips in the respective years of 2005-2007 (combined) and 2000 [7.4 percent in the 49 largest Metropolitan Statistical Areas (MSAs) in 2000]. In Marion County, the proportion of work trips by transit was about 1.7 and 2.2 for these same periods. Comparable statistics for other counties in the Indianapolis UZA range from 0.1-0.3 and 0.1-0.4 percent.⁴

For trips within the Indianapolis UZA, it does not appear that transit is a viable transportation choice in the region outside of transit-dependent populations in Marion County. A primary causal factor is the lack of dominant commercial/retail and other job centers, such as central business districts (CBDs) with sufficient square footage or employment densities to support transit. Other contributing elements include shifting population to exurban areas, isolated developments with inadequate roadway/sidewalk connectivity, low level of mixed land uses, accommodating travel demand through limited access highway expansions, and

³ 2006 NTD Data available via <http://www.ntdprogram.gov/ntdprogram/data.htm>.

⁴ FHWA analysis of Census Transportation Planning Package, <http://www.fhwa.dot.gov/ctpp/index.htm>.

increasing levels of associated highway-oriented/low density land development. As a result, residents are overly dependent upon personal vehicles and experience excessive or less than optimal household transportation expenditures.

Another concern is the substantial amount of federal funds used for past and recent NE Corridor AA and DEIS funding over a 12-year period without the project moving into the preliminary engineering phase. The project has not progressed in the past due to a lack of local funding commitment in addition to inadequate political and public support. Further, there has been little evidence shown that the MPO's member agencies are creating and implementing land use policies to support transit. Despite these shortcomings, it appears there has been recent momentum in establishing support for transit improvements through the IndyConnect initiative, 2035 MTP update, and a local plan developed by business leaders.

Recommendation 11: It is strongly recommended that the forthcoming Northeast Corridor New Starts application to enter preliminary engineering demonstrate innovative strategies to enhance feasibility of the project. This should include steps that have been implemented to support sufficient ratings for each of the criteria: mobility improvements; environmental benefits; operating efficiencies; cost effectiveness, and; transit supportive land use policies/future land use patterns. Project benefits should be quantified using broad performance measures such as those identified in the Planning Factors section. Evidence of commitment to performance-based planning should include intergovernmental agreements regarding establishment of Transit-Oriented Development (TOD) and comparable overall zoning/building codes to support public transportation.

Requirement: Bike/Pedestrian Planning is required in 23 USC 217 and 23 CFR 450.322(f)(8).

Status: Currently two planning documents provide guidance for bicycle and pedestrian planning in the Indianapolis region:

1. The Regional Bicycle Plan was developed in 2000. It was created in conjunction with a study review committee that represented various jurisdictions, community and special interest groups as well as a Citizens Advisory Committee (CAC). Many of the previous recommendations have been implemented, and so it is probably time to reassess the Region's needs and update the Bicycle Plan.
2. The Regional Pedestrian Plan is a framework adopted by the Metropolitan Development Commission in 2009 for each county and local jurisdiction

within the Metropolitan Planning Area (MPA) to use and implement as each community is able. The IMPO convened a steering committee of IRTC member jurisdictions' Departments of Planning and/or Public Works in order to incorporate each local bike/pedestrian plan into the document. The plan contains a set of guidelines for use when implementing pedestrian projects. It can be found at http://www.storrowkinsella.com/projectwebs/0105a_regpedplan/c_reports/MPA%20Regional%20Ped%20Plan%20WHOLE.pdf .

The City of Indianapolis has a designated Bicycle/Pedestrian Coordinator within the Department of Public Works (DPW). This coordinator and the City Office of Sustainability created a local bicycle plan consisting primarily of on-street bike lanes to improve non-vehicular mobility within the region's core (http://www.sustainindy.org/assets/uploads/01_current_bikeways_map.pdf). It contains phasing plans to set priorities within the network and is updated on a continuing basis by the DPW Coordinator. The typical funding mechanism for these bike lane projects has been to coordinate with street resurfacing projects to ensure striping is included for bicycle lanes as appropriate.

Indianapolis DPW will complete 23 lane miles of additional bicycle lanes in 2010. It is also anticipated that the Indianapolis Cultural Trail and Georgia Street Improvements (pedestrian mall link between Fieldhouse and Convention Center) will be completed prior to the Super Bowl in 2012. These improvements contribute to both livability within Indianapolis and economic vitality of the region as a whole. The City is also to be commended for receiving one of the five nationally awarded EPA/HUD/DOT Sustainable Communities Pilot Grants to assess a variety of sustainable redevelopment options in the Martindale-Brightwood and King Park neighborhoods.

Finding: IMPO's has done an excellent job updating the bicycle/pedestrian element of their transportation plan and it fully comports with the associated requirements.

Recommendation 12 – USDOT applauds IMPO and their Multimodal Task Force for the numerous successes in implementing the Regional Bicycle Plan. USDOT encourages IMPO to include an item in the 2011 UPWP to update the Regional Bicycle Plan to establish consensus regarding future priorities. See the Official USDOT Policy Statement on integrating pedestrian and bicycling into the transportation planning process through data collection and targeted increases in mode share (<http://www.dot.gov/affairs/2010/bicycle-ped.html>).

TRAVEL DEMAND MODEL

Requirement: 40 CFR 93.122 includes minimum specifications for travel models used to forecast vehicle activity for regional emission analyses in certain

air quality non-attainment and maintenance areas. These minimum specifications apply only to metropolitan planning areas with an UZA population over 200,000 and that are also serious, severe or extreme ozone or serious carbon monoxide non-attainment areas. All other non-attainment or maintenance areas must continue to meet the minimum specifications for travel models established in the Conformity Rule to the extent that those procedures have been the previous practice of the MPO.

Status: USDOT completed a review of the IMPO travel demand model (TDM) on July 1, 2010, to follow-up on several deficiencies that had been identified during the 2005 TDM Peer Review. USDOT was very pleased to find that IMPO has implemented the recommendations from the previous Peer Review and found that the updated model is fully adequate to support the current 2035 MTP update and the analytical needs for the NE Corridor AA/DEIS. The review was quite timely, in that IMPO was able to identify and task their consultant to complete the additional validation requirements needed to support the NE Corridor alternatives analysis.

Finding: The review team finds that the IMPO meets the federal requirements found in 40 CFR 93.122.

Recommendation 13 – IMPO is encouraged to further examine the potential applicability of the LUCI land-use allocation methods for their possible integration with the existing four step regional model. IMPO would then be able to evaluate alternative land use scenarios as part of future updates to the MTP.

METROPOLITAN PLANNING FACTORS

Requirement: Federal regulations at 23 CFR 450.306 and 450.318 define the scope of the metropolitan transportation planning process and the relationship of corridor and other subarea planning studies to the metropolitan planning process and the National Environmental Policy Act (NEPA) requirements. Key provisions of 23 CFR 450.306 are related to required planning factors, coordination, and consistency with related planning processes, asset management, and requirements for Transportation Management Areas (TMAs) which are areas with an UZA of 200,000 or more.

Current federal law found in SAFETEA-LU contains eight planning factors that must be explicitly considered, analyzed as appropriate, and reflected in the planning process products. The eight planning process factors include:

- Support the economic vitality of the metropolitan area, especially by enabling global competitiveness, productivity, and efficiency.
- Increase the safety of the transportation system.
- Increase the security of the transportation system.
- Increase the accessibility and mobility for people and freight.

- Protect and enhance the environment, promote energy conservation, improve quality of life, and promote consistency between transportation improvements and State and local planned growth and economic development patterns.
- Enhance the integration and connectivity of the transportation system, across and between modes, for people and freight.
- Promote efficient system management and operation.
- Emphasize the preservation of the existing transportation system.

Status: The planning factors identified in federal legislation are included in the planning products of the MPO. IMPO's planning process provides consideration of projects and strategies that address each of the factors. The factors form the basis of the goals in the 2030 Transportation Plan, FY 2009-2012 TIP, and CY 2009-2010 UPWP.

Finding: The review team finds that the MPO addresses the eight planning factors of SAFETEA-LU.

Recommendation 14 – It is recommended that IMPO develop and implement performance measures in the MTP to expand upon those that address traffic movement. The measures should gauge widespread performance of the multi-modal (roadway, transit, truck/rail freight, non-motorized) transportation system. The metrics should take into account the relationship between modal balance and the planning factors, particularly: improving quality of life, economic well-being, equity, energy conservation, connectivity, and overall system efficiency. Examples of performance measures and techniques to consider include:

- Higher: Traditional NTD statistics (transit ridership, farebox recovery ratios, etc.); Non-Motorized Trips (pedestrian and bicycling); Roadway Connectivity Indexes (Link/Node Ratio, Intersection Density, etc.); Per Capita Income or Wealth Index; Entropy Index (land use mix); Population/ Employment Densities in Incorporated Areas; Central Business District Square Footage/Floor Area Ratios; Gross Regional Product.
- Lower: Per Capita VMT; Distances to CBDs and Transit; Household Transportation Expenditures; Affordability Index (Housing + Transportation Costs / Income); Emissions; Parking Availability; Dissimilarity Index (level of racial integration);
- Freight Specific: Truck-Related Traffic Data, such as Commercial Vehicle Traffic Counts; Data on Locations of Major Freight Facilities such as ports, inter-modal facilities, and truck transfer and regional distribution centers; and Identification of Freight Corridors

FREIGHT/INTERMODAL ACITIVITIES

Requirement: Federal law (23 USC 134(g)(4) and 134(h)(1)(B)) requires the MPO to provide freight shippers, providers of freight transportation services, and other freight stakeholders an opportunity to comment on the plan and TIP.

Federal regulations (23 CFR 450.312) also require the MPO to coordinate with various transportation providers (including rail freight operators, etc.) in the development of the plan and TIP.

In addition, 23 CFR 450.316 (7) expressly states that major freight distribution routes shall be one of the factors explicitly considered, analyzed as appropriate, and reflected in the planning process products. It further states that supporting technical efforts should provide an analysis of goods and services movement problem areas, as determined in cooperation with appropriate private sector involvement, including but not limited to, addressing interconnected transportation access and service needs of intermodal facilities.

Status: There have been several MPO sponsored freight related studies completed over the past ten to fifteen years that have gathered information on freight movements. The “Indianapolis Intermodal Freight System Plan” completed in March 2005 examined major freight flows occurring in the Southwest quadrant of the Indianapolis region. The study focused on the freight facilities in this area including the CSX Avon Yard intermodal facility; the Federal Express hub at the Indianapolis International Airport and the various distribution and warehousing facilities in this area – particularly to the west and south of the airport.

The Regional Freight Study currently underway is examining the freight railroads in the region and gathering information on major facilities served, primary commodities shipped, origin and destination information for the various commodities, and overall track condition and number of train movements on the various corridors. The study is also looking at intermodal facilities in terms of commodity movements and origin / destination data to see if there may be opportunities for improving operating efficiencies. By gathering input from local trucking firms and high volume shippers, the study will also identify freight bottleneck locations and recommend improvements to minimize associated delay and/or congestion.

The MPO also participates in the Mississippi Valley Freight Coalition in addition to coordinating with a private freight advocacy, Conexus, and INDOT on state, regional and national scope freight issues that impact central Indiana.

Air Cargo: Significant improvements to I-70 and the new Mid-Field Terminal Interchange off of I-70 have helped strengthen the FedEx facility and its potential for expansion and also provided improved access to the warehousing and

distribution facilities west of the airport. Studies are currently underway regarding potential uses for the previous terminal.

Ports: There are no water ports within the IMPO region.

Trucking: By identifying the areas with the highest levels of trucking movements and highest amounts of industrial, warehousing and distribution facilities, the MPO has been able to help support the development of important roadway projects to facilitate the heavy trucking volumes around these areas. Projects such as the Ronald Reagan Parkway are being constructed to help improve north – south traffic on the west side of the region and benefit trucking moves between I-70 and the CSX Avon Yard as well as the growing amount of warehousing and distribution facilities in this area that desire easy access to the interstate network and/or to the FedEx air freight facilities. The current regional freight study is examining trucking routes and gathering input from shippers to help identify bottleneck locations.

Rail: The current regional freight study is looking closely at the rail infrastructure including rail intermodal facilities to gather a better understanding of the businesses served, types of commodities moved, intermodal linkages, origin and destinations of freight, traffic densities on the various lines and related information about the rail industry serving our region.

Finding: Freight and other intermodal activities are considered well in the planning process for the transportation plan.

SAFETY

Requirement: Federal statute 23 USC 134 (h)(1)(B) requires the MPO to consider safety of the transportation system and its users, within the metropolitan planning process, the MTP, and the TIP. This process should be collaborative, data-driven and comprehensive. All planning partners should incorporate safety into all aspects of the transportation planning process.

Efforts should address safety solutions in Engineering (infrastructure improvements), Enforcement (red light running, speed limits), Education (bicycle-pedestrian education, youth alcohol awareness), and Emergency Services (incident management, emergency access to incident locations). These four categories are commonly referred to as the “Four-E’s” of safety.

SAFETEA-LU established a core safety program called the Highway Safety Improvement Program (HSIP) (23 U.S.C. 148), which introduced a mandate for Strategic Highway Safety Plans (SHSPs). A SHSP is a statewide coordinated safety plan that provides a comprehensive framework for reducing highway fatalities and serious injuries on all public roads. Metropolitan and statewide transportation planners must be an integral part of the SHSP process.

The metropolitan transportation planning process should be consistent with the SHSP, and other transit safety and security planning and review processes, plans and programs as appropriate (23 CFR 450.306 (h)). MPOs are encouraged to include a safety element in the metropolitan transportation plan that incorporates or summarizes the priorities, goals, countermeasures, or projects for the Metropolitan Planning Area contained in the SHSP. Other components to consider consist of emergency relief/disaster preparedness plans, strategies, and policies that support homeland security (as appropriate) and safeguard the personal security of all motorized and non-motorized users [23 CFR 450.322 (h)].

Status: The MPO initiated a Safety Study in May of 2010 as part of the UPWP. PB America, Inc. consultants were contracted to identify and study high-crash locations within the Indianapolis metropolitan area. Safety deficiencies will be identified along with recommendations for improvements including low-cost maintenance items, such as signage and pavement markings, or possibly high-cost capital improvements, such as reconstruction with added turning lanes. The consultant under direction from the IMPO will complete a roadway safety audit (RSA) with LPA representatives and local police to identify treatments to address the safety concerns, and where appropriate, develop the scope of work for an intersection improvement project.

The MPO coordinates, processes, and selects all local Highway Safety Improvement Program (HSIP) and Congestion Mitigation and Air Quality (CMAQ) project applications. The MPO needs to build upon the recent Safety Study to develop a systematic regional approach to safety planning, so that a sound 4-year list of HSIP/CMAQ projects can be developed and continually updated for inclusion in the TIP.

Finding: The review team finds the IMPO is at the early stages of developing a regional approach to safety planning and is currently minimally compliant with the safety requirements of the federal planning regulations.

Recommendation 15 – USDOT encourages IMPO to build upon the current Safety Study to develop a systematic regional approach to safety planning. The safety analysis should identify high accident locations throughout the MPA and complete a Roadway Safety Audit to identify strategies to address deficiencies. The IRTC should use the results of this systematic regional approach to develop a 4-year list of Highway Safety Improvement Program (HSIP) and Congestion Mitigation and Air Quality (CMAQ) Projects for inclusion in the TIP. By prioritizing a 4-year list of projects based on need, LPAs will have time to develop quality projects using available HSIP/CMAQ funds.



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