



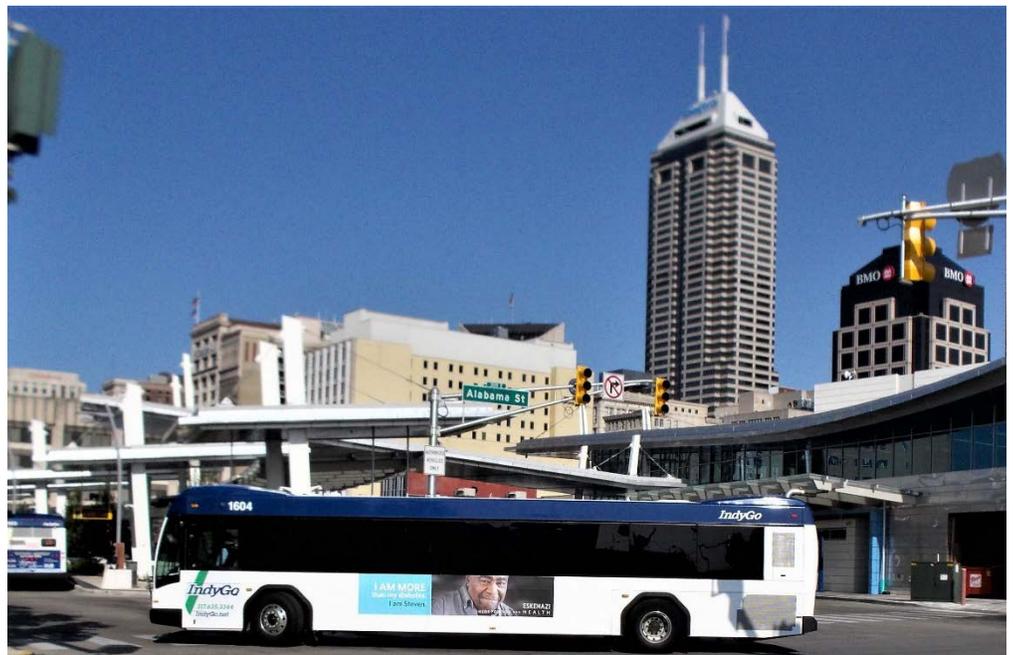
U.S. Department
of Transportation

Transportation Management Area Planning Certification Review

Federal Highway
Administration

Federal Transit
Administration

Indianapolis Metropolitan Planning Area



November 2018

Report

Table of Contents

1.0	EXECUTIVE SUMMARY	3
1.1	Summary of Current Findings	3
1.2	Previous Findings and Disposition.....	5
2.0	INTRODUCTION	6
2.1	Background.....	6
2.2	Purpose and Objective	7
3.0	SCOPE AND METHODOLOGY	7
3.1	Review Process.....	7
3.2	Documents Reviewed.....	8
4.0	PROGRAM REVIEW	9
4.1	Metropolitan Planning Area Boundaries	9
4.2	MPO Structure and Agreements.....	9
4.3	Unified Planning Work Program	12
4.4	Metropolitan Transportation Plan	13
4.5	Transit Planning.....	14
4.6	Transportation Improvement Program.....	16
4.7	Public Participation	17
4.8	Civil Rights (Title VI, EJ, LEP, ADA).....	18
4.9	List of Obligated Projects	20
4.10	Freight Planning.....	21
4.11	Transportation Safety.....	23

4.12	Nonmotorized Planning/Livability	24
4.13	Integration of Land Use and Transportation	25
4.14	Travel Demand Forecasting	26
4.15	Air Quality	27
4.16	Congestion Management Process / Management and Operations.....	28
4.17	Financial Planning.....	29
4.18	Self-Certifications	30
4.19	Visualization Techniques	31
4.20	Performance-Based Planning and Programming	32
5.0	CONCLUSION AND RECOMMENDATIONS.....	33
5.1	Commendations	33
5.2	Corrective Actions	34
5.3	Recommendations	34
APPENDIX A - PARTICIPANTS		35
APPENDIX B - STATUS OF FINDINGS FROM LAST REVIEW		36
APPENDIX C – PUBLIC COMMENTS.....		43
APPENDIX D - LIST OF ACRONYMS.....		44

1.0 EXECUTIVE SUMMARY

On June 11-13, 2018, the Federal Highway Administration (FHWA) and the Federal Transit Administration (FTA) conducted the certification review of the transportation planning process for the Indianapolis urbanized area. FHWA and FTA are required to jointly review and evaluate the transportation planning process for each urbanized area over 200,000 in population at least every four years to determine if the process meets the Federal planning requirements.

1.1 Summary of Current Findings

The current review found that the metropolitan transportation planning process conducted in the Indianapolis urbanized area meets Federal planning requirements.

As a result of this review, FHWA and FTA are certifying the transportation planning process of the Indianapolis Metropolitan Planning Organization (IMPO). This review included input from the Indiana Department of Transportation (INDOT), the Indianapolis Metropolitan Planning Organization (IMPO) and the Indianapolis Public Transit Corporation (IndyGo), and the Central Indiana Regional Transportation Authority (CIRTA).

Federal requirements in the following areas are being met: Metropolitan Planning Area Boundaries, Unified Planning Work Program, Metropolitan Transportation Plan, Transportation Improvement Program, Public Participation, List of Obligated Projects, Freight, Nonmotorized Planning/Livability, Integration of Land Use and Transportation, Air Quality Clean Air Act, Congestion Management Process / Management and Operations, Financial Planning, Self-Certifications, and Performance-Based Planning and Programming.

The IMPO is performing very well in several areas that merit commendation. There are a couple recommendations that warrant close attention and follow-up. A summary of the commendations and recommendations are in the table below. Details of the certification finding for each area is contained in this report.

Review Area	Finding	Action	Corrective Actions/ Recommendations/ Commendations	Resolution Due Date
MPO Structure and Agreements 23 U.S.C. 134(d) 23 CFR 450.314(a)	The structure of IMPO is in compliance with the requirements of 23 CFR 450.314(a).	Commendation Recommendation	For developing and getting unanimous policy approval for a Strategic Plan that details how the MPO will become an independent organization and expand their charge to other transportation-related areas such as economic development, land use, and water planning. The IMPO has expressed deep concerns over how the FHWA Planning (PL) funds are distributed. INDOT and the IMPO should work together to determine how this may be resolved.	N/A
Transit Planning 49 U.S.C. 5303 23 U.S.C. 134 23 CFR 450.314	The IMPO is in compliance with 23 CFR 450.314.	Commendation	IMPO is commended on its integral role in the public outreach and education process for the Marion County transit referendum, as well as efforts underway to expand transit beyond Marion County.	N/A
Civil Rights Title VI Civil Rights Act, 23 U.S.C. 324, Age Discrimination Act, Sec. 504 Rehabilitation Act, Americans with Disabilities Act	The IMPO Title VI Plan meets the requirements of the Civil Rights Act of 1964 and Executive Order #12898.	Commendation Recommendation Recommendation	The use of "out of the box" strategies to engage the traditionally underserved populations is commended. IMPO should incorporate these strategies into the IMPO public involvement procedures. IMPO should use a four-factor analysis, as described in USDOT guidance, to assess language needs and decide reasonable steps to take to ensure meaningful access for LEP persons.	N/A

Review Area	Finding	Action	Corrective Actions/ Recommendations/ Commendations	Resolution Due Date
Travel Demand Forecasting 23 CFR 450.324(f)(1)	IMPO meets the federal requirements for travel demand modeling.	Commendation	The Data, Analytics and Modeling Plan is a comprehensive strategy that details year-by-year schedule of data purchases and development of analytical tools.	N/A
Visualization Techniques 23 CFR450.316(a)(1)(iii)	The planning process is compliant with planning requirements found at 23 CFR 450.316(a)(1)(iii).	Commendation	The IMPO is commended for the exemplary visualization techniques used in many products generated to communicate information.	N/A

1.2 Previous Findings and Disposition

The previous certification review for the Indianapolis urbanized area was conducted in 2014. Those certification review findings and their disposition are provided in Appendix B and summarized as follows.

Finding	Action	Corrective Actions/ Recommendations	Disposition
1 – Asset management coordination needs improvement	Recommendation	IMPO, INDOT, IndyGo, and CIRTAs should coordinate better regarding asset management.	Resolved
2 – Improvements needed in selection process for major capital investments	Recommendation	More transparently demonstrate inclusion in Congestion Management Process	Resolved
3 – Utilize scenario planning when updating MTP	Recommendation	Chosen scenario should be based on targeted improvements to performance measures and address planning factors.	Resolved
4 – MTP does not include costs for public transportation.	Recommendation	Include transit costs and needed resources to adequately demonstrate fiscal constraint	Resolved
5 – More effort should be made to reduce Single-Occupancy Vehicle transport	Recommendation	INDOT and IMPO should evaluate corridor-level congestion pricing as part of CMP	Resolved
6 – CIRTAs projects missing from the Annual List of Obligated Projects	Recommendation	CIRTAs projects should be included in the Annual List of Obligated Projects	Resolved

Finding	Action	Corrective Actions/ Recommendations	Disposition
7 – LRTP does not include potential environmental mitigation activities	Recommendation	The next MTP should include potential environmental mitigation activities	Resolved
8 – Public comments received not clearly documented	Recommendation	MPO should clearly document public comments received, including online of the PPP, MTP and TIP.	Resolved
9 – More transparency needed in EJ benefits and burdens analysis	Recommendation	Improve transparency of EJ benefits and burdens analysis, including an examination of travel mode to employment and community amenities.	Resolved
10 – Data collection expansion needed for non-motorized travel	Recommendation	Expand non-motorized data collection, and set mode share performance measures and targets.	Resolved

2.0 INTRODUCTION

2.1 Background

Pursuant to 23 U.S.C. 134(k) and 49 U.S.C. 5303(k), the Federal Highway Administration (FHWA) and the Federal Transit Administration (FTA) must jointly certify the metropolitan transportation planning process in Transportation Management Areas (TMAs) at least every four years. A TMA is an urbanized area, as defined by the U.S. Census Bureau, with a population of over 200,000. In general, the reviews consist of three primary activities: a site visit, a review of planning products (in advance of and during the site visit), and preparation of a Certification Review Report that summarizes the review and offers findings. The reviews focus on compliance with Federal regulations, challenges, successes, and experiences of the cooperative relationship between the MPO(s), the State DOT(s), and public transportation operator(s) in the conduct of the metropolitan transportation planning process.

The Certification Review process is only one of several methods used to assess the quality of a regional metropolitan transportation planning process, compliance with applicable statutes and regulations, and the level and type of technical assistance needed to enhance the effectiveness of the planning process. Other activities provide opportunities for this type of review and comment, including Unified Planning Work Program (UPWP) approval, the Metropolitan Transportation Plan (MTP), metropolitan and statewide Transportation Improvement Program (TIP/STIP) findings, air-quality (AQ) conformity determinations (in nonattainment and maintenance areas), as well as a range of other formal and less formal contact provide both FHWA/FTA an opportunity to comment on the planning process. The results of these other processes are considered in the Certification Review process.

2.2 Purpose and Objective

Since the enactment of the Intermodal Surface Transportation Efficiency Act (ISTEA) of 1991, the FHWA and FTA, are required to jointly review and evaluate the transportation planning process in all urbanized areas over 200,000 population to determine if the process meets the Federal planning requirements in 23 U.S.C. 134, 40 U.S.C. 5303, and 23 CFR 450. The Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users (SAFETEA-LU), extended the minimum allowable frequency of certification reviews to at least every four years.

The IMPO is the designated MPO for the Indianapolis urbanized area. INDOT is the responsible State agency and IndyGo and CIRTAs are the responsible public transportation operators. Current membership of the IMPO consists of elected officials and citizens from the political jurisdictions in 34 cities, towns and counties. The study area includes all of the City of Indianapolis as the largest population center.

Certification of the planning process is a prerequisite to the approval of Federal funding for transportation projects in such areas. The certification review is also an opportunity to provide assistance on new programs and to enhance the ability of the metropolitan transportation planning process to provide decision makers with the knowledge they need to make well-informed capital and operating investment decisions.

3.0 SCOPE AND METHODOLOGY

3.1 Review Process

The previous certification review was conducted in 2014. A summary of the status of findings from the last review is provided in Appendix B. This report describes the outcome from the formal site visit and a public involvement opportunity, conducted on June 11-12, 2018.

Participants in the review included representatives of FHWA, FTA, INDOT, IndyGo, CIRTAs, and IMPO staff. A full list of participants is included in Appendix A.

A desk audit of current documents and correspondence was completed prior to the site visit. In addition to the formal review, routine oversight mechanisms provide a major source of information upon which to base the certification findings.

The certification review covers the transportation planning process conducted cooperatively by the MPO, State, and public transportation operators. Background information, current status, key findings, and recommendations are summarized in the body of the report for the following subject areas selected by FHWA and FTA staff for on-site review:

- Metropolitan Planning Area Boundaries

- MPO Structure and Agreements
- Unified Planning Work Program
- Metropolitan Transportation Plan (MTP)
- Transit Planning
- Transportation Improvement Program (TIP)
- Public Participation
- Civil Rights (Title VI, EJ, LEP, ADA)
- List of Obligated Projects
- Freight Planning
- Transportation Safety
- Transportation Security Planning
- Nonmotorized Planning/Livability
- Integration of Land Use and Transportation
- Travel Demand Forecasting
- Air Quality
- Congestion Management Process / Management and Operations
- Financial Planning
- Self-Certifications
- Visualization Techniques
- Performance-Based Planning and Programming

3.2 Documents Reviewed

The following MPO documents were evaluated as part of this planning process review:

- MOA – IMPO, IndyGo, INDOT – July 2014
- MOA – IMPO, Anderson MPO, Columbus MPO – March 2015
- IMPO Bylaws – 2015
- FY 2018 Unified Planning Work Program for the IMPO
- MPO Long Range Transportation Plan – 2045
- MPO TIP and Self-Certification
- INDOT approval letter of IMPO MPA on behalf of the Governor – February 7, 2014
- Public Meeting Notice

4.0 PROGRAM REVIEW

4.1 Metropolitan Planning Area Boundaries

4.1.1 Regulatory Basis

23 U.S.C. 134(e) and 23 CFR 450.312(a) state 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 MTP.

4.1.2 Current Status

The 2010 Census resulted in changes to the Indianapolis Urbanized Area (UZA). The UAB was approved by FHWA on January 30, 2013. INDOT approved the agreed upon IMPO MPA on behalf of the Governor by letter dated February 7, 2014. The MPA map can be found on the IMPO website.

The Columbus, Indianapolis, and Anderson MPOs coordinated with each other to update their respective MPAs. A small portion of the Columbus UZA in Johnson and Shelby Counties is included in the IMPO MPA. Due to historical planning practices, Fortville and Ingles chose to remain part of the Madison County Council of Governments (MCCOG) MPA. Thus, the associated portion of the Indianapolis UZA has been included in the MCCOG MPA.

4.1.3 Findings

The MPA and UAB meet the applicable planning requirements at 23 U.S.C. 134(e) and 23 CFR 450.312.

4.2 MPO Structure and Agreements

4.2.1 Regulatory Basis

23 U.S.C. 134(d) and 23 CFR 450.314(a) state the MPO, the State, and the public transportation operator 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, and the public transportation operator serving the MPA.

4.2.2 Current Status

By letter dated August 4, 2010, the Commissioner of INDOT re-designated the City of Indianapolis Department of Metropolitan Development as the Indianapolis MPO, on behalf of the Governor of Indiana. The letter noted that the IMPO Policy Committee (composed of elected and appointed officials within the planning area) is granted approval authority for all transportation-related activities of the IMPO.

The City of Indianapolis Department of Metropolitan Development (DMD) is the designated MPO for the Indianapolis Metropolitan Planning Area. The Indianapolis Metropolitan Planning Organization (IMPO) is a division within the DMD. The Metropolitan Planning Area (MPA) covers eight counties (8), 11 cities and 22 towns. Transit Operators include the Indianapolis Public Transportation Corporation, known as IndyGo and the Central Indiana Regional Transportation Authority, CIRTA.

The IMPO currently has a hosting agreement with the City of Indianapolis and the IMPO Administrative Committee to formalize policies related to personnel, procurement of goods and services, contractual issues, financial issues, and information technology.

MPO Organization Restructure

The MPO has been an active and well-respected partner in many Central Indiana initiatives, both in transportation and related, regionally-focused economic development, land use, and water planning. Through these efforts, MPO members and other regional partners have asked the MPO to consider formally taking on additional responsibilities. To understand the broader opportunities available to the MPO, as well as to inventory the needs of the MPO's member communities, the Indianapolis MPO completed wide-ranging Regional Strategic Plan to guide the short- and mid-term direction of the organization.

MPO leadership began by researching high-functioning regional organizations around the country, and leading board trips to Atlanta and Denver. IMPO's board leadership was able to witness those regions first-hand, meet their counterparts, and have discussions about how and why those regions are able to take on so much more than a standard MPO. Next, the MPO engaged more than 500 local leaders in five industries: housing, land use, transportation, water, and economic development. Each panel met twice over the course of the year to discuss the region's biggest challenges, and to discuss whether the MPO could play a role in documenting challenges and directing mitigation efforts.

The MPO Strategic Plan, which was unanimously adopted in August 2018, synthesized these findings. Stakeholders and members agreed to expand the MPO's charge to transportation planning, land use, housing, water, and economic development, all supported by the new mantra of Convene, Inform, Plan, and Fund. The first step is for the MPO to end its hosting agreement with the City of Indianapolis and become an independent organization by mid-2020. The second step is for the MPO to continue facilitating these topical panels, and to begin

documenting intersecting regional priorities. As part of this effort, the MPO will also collect and track benchmark data, and seek State and Federal funding opportunities to implement solutions. Finally, the MPO will continue to work with regional partners – particularly local elected officials from the Policy board – to design the most appropriate regional governance structure through state statute.

FHWA Planning (PL) Fund Distribution

The current PL Distribution Formula came about when Indianapolis was having difficulty matching the full federal amount, which is no longer an issue since every central Indiana community now pays their per capita share of the required match. The IMPO purports that this formula was never meant to be a permanent policy, and states it significantly reduces per capita funding precisely where need is the greatest. INDOT continues to defer the decision whether to modify the formula to the MPO Council, which has been unwilling to adopt any formula change. The IMPO is concerned that the current formula makes Central Indiana the sole “donor region”, forcing Indiana’s most populous, most economically and racially diverse, and fast growing metropolitan area to bear the full burden of subsidies to every other region in the state, large and small.

The current INDOT distribution methodology for FHWA PL funds is viewed by the IMPO as penalizing growing urban centers with larger populations, more roadway mileage, and higher concentrations of low income and minority households. In the future, it may not just be Indianapolis that could feel the impact. As provided by the IMPO, an example of the formula’s effect on large MPO regions is now potentially reflected in the Northwest Region’s growth. According to the existing formula, any MPO receiving over 20% of the total PL funding is no longer eligible to participate in the second tier of funding distribution (Equalization) and instead receives a flat \$50,000. Indianapolis is the only MPO that has ever qualified, but Northwest Indiana already has 18.6% of the FY2017 allocation. If Northwest Indiana adds residents and exceeds the 20% population threshold, it stands to lose 25% of its PL funding (using FY2017 allocations).

The IMPO states that they have developed alternative distribution formulas based on examples from other states, and a variety of planning factors that accomplish the stated goal of sustaining smaller Indiana MPOs. In several proposed scenarios, it is described that small MPOs would still receive the same level of sustaining funds over and above their expected pro rata return, with a handful of the larger MPOs (like Fort Wayne and Northwest Indiana) sharing the burden of that subsidy with Indianapolis. While the MPO Council PL committee did review these alternatives, and the full MPO Council has voted on these proposals, the result has been multiple 14-1 votes (with the Indianapolis MPO as the one dissenting vote) to keep the current distribution formula.

4.2.3 Findings

The structure of IMPO is in compliance with the requirements of 23 CFR 450.314(a).

Commendation – FHWA and FTA commends the IMPO for their efforts in transportation-related and regionally-focused economic development, land use, and water planning. To this end, the IMPO developed a Strategic Plan which was unanimously adopted by the policy board in August 2018. This Plan details a multi-step process for becoming an independent organization by mid-2020, then expanding the MPO’s charge in these other areas.

Recommendation – The IMPO has expressed deep concerns over how the FHWA Planning (PL) funds are distributed and makes the Indianapolis MPO the sole “donor region”. FHWA and FTA recommends that the INDOT and the IMPO work together to determine how this may be resolved.

4.3 Unified Planning Work Program

4.3.1 Regulatory Basis

23 CFR 450.308 sets the requirement that planning activities performed under Titles 23 and 49 U.S.C. be documented in a Unified Planning Work Program (UPWP). The MPO, in cooperation with the State and public transportation operator, shall develop a UPWP that includes a discussion of the planning priorities facing the MPA and the work proposed for the next one- or two-year period by major activity and task in sufficient detail to indicate the agency that will perform the work, the schedule for completing the work, the resulting products, the proposed funding, and sources of funds.

4.3.2 Current Status

The most current UPWP is for calendar year 2018 and was approved by FHWA on December 13, 2017. It includes a discussion of the MPO goals in terms of a mission statement, Planning Emphasis Areas, and planning priorities of the MPO. The activities are organized into six major categories. The narrative provided for each activity indicates who will conduct the activity, the schedule for completing the activity, as well as the resulting product. Appendix A of the UPWP includes a detailed table that provides total anticipated costs and funding sources.

All members of the MPO boards, including INDOT, IndyGo, the Anderson MPO, and Columbus MPO had opportunities to review the draft UPWP and all amendments prior to approval.

4.3.3 Findings

The IMPO UPWP meet the federal requirements found in 23 CFR 450.308.

4.4 Metropolitan Transportation Plan

4.4.1 Regulatory Basis

23 U.S.C. 134(c), (h) & (i) and 23 CFR 450.324 set forth requirements for the development and content of the Metropolitan Transportation Plan (MTP). Among the requirements are that the MTP address at least a 20-year planning horizon and that it includes both long and short-range strategies that lead to the development of an integrated and multi-modal system to facilitate the safe and efficient movement of people and goods in addressing current and future transportation demand.

The MTP is required to provide a continuing, cooperative, and comprehensive multimodal transportation planning process. The plan needs to consider all applicable issues related to the transportation systems development, land use, employment, economic development, natural environment, and housing and community development.

23 CFR 450.324(c) requires the MPO to review and update the MTP at least every four years in air quality nonattainment and maintenance areas and at least every 5 years in attainment areas to reflect current and forecasted transportation, population, land use, employment, congestion, and economic conditions and trends.

Under 23 CFR 450.324(f), the MTP is required, at a minimum, to consider the following:

- Projected transportation demand
- Existing and proposed transportation facilities
- Operational and management strategies
- Congestion management process
- Capital investment and strategies to preserve transportation infrastructure and provide for multimodal capacity
- Design concept and design scope descriptions of proposed transportation facilities
- Potential environmental mitigation activities
- Pedestrian walkway and bicycle transportation facilities
- Transportation and transit enhancements
- A financial plan

4.4.2 Current Status

The most current MTP is the 2045 LRTP, thus well beyond the 20-year planning horizon requirement.

The 2045 LRTP includes four themes, each with goals, objectives, and performance measures: MOVE, PROSPER, MAKE SAFE, and SUSTAIN. The MOVE theme focuses on roadway, bikeway, and sidewalk connectivity, support for transit initiatives, and addressing system performance

and congestion. The PROSPER theme focuses on accessibility to transportation options (like auto and transit) and efficiency of goods and freight movement. The MAKE SAFE theme focuses on facility condition (road/bridge/transit assets), and reduction of serious injuries and fatalities. The SUSTAIN theme recommends support for non-motorized (multi-modal) options to improve air quality.

The 2045 LRTP was adopted by the IMPO Policy Committee in December 2017. At that time, the IMPO was in attainment, so five years was the maximum time between the IMPO LRTP updates. Subsequently, there was a court ruling that reversed a USEPA decision which essentially made many MPO areas in the country, including the IMPO MPA, maintenance for the 1997 8-hour ozone. As a result, the MTP now needs to be updated within four years.

4.4.3 Findings

The current MTP meets the federal requirements of 23 CFR 450.324 and 23 CFR 306.

4.5 Transit Planning

4.5.1 Regulatory Basis

49 U.S.C. 5303 and 23 U.S.C. 134 require the transportation planning process in metropolitan areas to consider all modes of travel in the development of their plans and programs. Federal regulations cited in 23 CFR 450.314 state that the MPO in cooperation with the State and operators of publicly owned transit services shall be responsible for carrying out the transportation planning process.

4.5.2 Current Status

In the 2014 review IMPO was commended on their extensive planning work for IndyConnect. Since then IMPO has continued extensive outreach and transit planning with regional partners under the IndyConnect brand as highlighted below shared by the IMPO:

Alternatives Analysis (AA): Three AA's have been done predominately with in-house IMPO staff for the Red, Blue and Purple Lines. IndyGo has received an FTA Small Starts grant for Phase 1 of the Red Line Bus Rapid Transit (BRT). The Purple and Blue Lines are also BRT lines and are in the FTA Project Development phase with the goal of attaining Small Starts grants.

IndyGo Forward / Marion County Transit Plan: With partners at IndyGo, the MPO funded and managed the IndyGo Forward planning process, which was the City's most comprehensive transit network revision in generations. It formed the basis of what would become the Marion County Transit Plan, which is the plan that Marion County voters elected to fund in 2016.

Central Indiana Transit Plan: At the end of 2015, MPO staff aggregated all the transit planning work to date and combined it into a single document, the Central Indiana Transit Plan. The first part of the plan documents the research that has been done on transit in Central Indiana, and the amount of great outreach the IndyConnect partners conducted since the initiative began in 2009. The enabling legislation for Central Indiana's transit referenda (IC 8-25-2) authorized ten Central Indiana counties or the townships within them to hold referenda on dedicated transit funding. Therefore, the second part of the document devotes a chapter to each county in the region that has taken up transit planning, detailing recommendations for routing, funding, and governance. The Indiana Planning Association recognized the Central Indiana Transit Plan as one of the best transportation plans in the state in 2017.

Indianapolis-Marion County referendum and outreach: Indianapolis-Marion County City-County Council voted to put a referendum on the ballot in November 2016, and the MPO played a central role in ensuring that residents:

- 1) knew that the transit question was on the ballot,
- 2) knew that it was asking for a 0.25% income tax increase,
- 3) knew where to find the Marion County Transit Plan, which detailed the system that new income tax would fund, and
- 4) had the opportunity to ask questions about the referendum or the plan.

The public engagement process had many partners. This allowed IMPO to host 654 public engagement events between April and November of 2016. This iteration of IndyConnect was the largest public involvement process yet, and the third to win an award for outstanding outreach and communication (since 2010, IndyConnect partners have hosted *nearly 1,200 public engagement opportunities in a variety of formats across Central Indiana*). Residents passed the referendum, launching IndyGo into a three-year build-out of a \$450 million capital program that will expand their services by 70%.

Hamilton County Transit Forum: The IMPO facilitated a major collective impact initiative focused on studying new transit service in Fishers, Carmel, Westfield, and Noblesville. The stakeholder group was broad and inclusive, resulting in detailed recommendations for routing, funding, governance, and additional public engagement.

Plainfield and Greenwood Transit Plans: As fast-growing Southern and Western suburbs of Indianapolis have showed more interest in exploring their transit and referendum options, the IMPO is working with local stakeholders to evaluate alternatives and tailor local transit plans with community input. Along with supporting IndyGo's buildout of the Marion County Plan, transit studies in Plainfield and Greenwood will be IndyConnect's focus for the next couple of years.

Transit state of good repair & Transit Safety: IndyGo is currently developing its federal performance measures, as outlined in MAP-21, reinforced in the FAST-Act and promulgated in federal regulations. IndyGo staff has reviewed the federal requirements. IndyGo staff met in

March 2018 to continue to refine IndyGo's processes and met again in April 2018 to further delineate responsibilities and outline a timeline. IndyGo will coordinate its efforts with the IMPO, including details on its measures and process.

4.5.3 Findings

The IMPO is in compliance with 23 CFR 450.314.

Commendation – The IMPO's transit planning process has already been successfully applied in Marion and Hamilton Counties. In 2019, it is anticipated that the Central Indiana Transit Plan will add new chapters as the MPO replicates this process to inform the scheduled Guilford Township (City of Plainfield) transit referendum, as well as potential 2020 referenda in suburban Pleasant Township (City of Greenwood), Clay Township (City of Carmel), and Washington Township (City of Westfield). The FHWA and FTA commends the IMPO, IndyGo, CIRT and all the local governments in the transit successes in recent years and encourage all parties involved to continue the momentum to successfully expand transit beyond Marion County.

4.6 Transportation Improvement Program

4.6.1 Regulatory Basis

23 U.S.C. 134(c),(h) & (j) set forth requirements for the MPO to cooperatively develop a Transportation Improvement Program (TIP). Under 23 CFR 450.326, the TIP must meet the following requirements:

- Must cover at least a four-year horizon and be updated at least every four years.
- Surface transportation projects funded under Title 23 U.S.C. or Title 49 U.S.C., except as noted in the regulations, are required to be included in the TIP.
- List project description, cost, funding source, and identification of the agency responsible for carrying out each project.
- Projects need to be consistent with the adopted MTP.
- Must be fiscally constrained.
- The MPO must provide all interested parties with a reasonable opportunity to comment on the proposed TIP.

4.6.2 Current Status

The IMPO TIP is a four-year TIP and is updated at least every 4 years. All transportation projects utilizing Title 23 U.S.C. or Title 49 U.S.C. funding are included in the TIP. The TIP includes project description, cost, funding source, and identification of the agency responsible for carrying out each project, as well as many other fields of data used in management of project delivery

through construction. Federal funding sources are Surface Transportation Block Grant (STBG), Congestion Mitigation and Air Quality (CMAQ), Highway Safety Improvement Program (HSIP), and Transportation Alternatives Program (TAP), as well as FTA funding.

The TIP is consistent with the MTP. Every “capacity-enhancing” project in the TIP is also listed in the MTP, and there is close coordination between these documents as amendments for each project are proposed and processed.

The TIP includes financial information, developed in cooperation with the INDOT and IndyGo, that provides details of reasonably expected revenues from public and private sources, as well as planned expenditures that demonstrates that the program is financially realistic. Appendix C of the TIP includes a breakdown by funding source for each year of the TIP.

The IMPO established an on-line application and management system called MiTIP to automate processes associated with the call for projects, TIP preparation and amendments, and quarterly project tracking. MiTIP is working so well that INDOT is in the process of utilizing this electronic system for the STIP.

The MPO works cooperatively with all the jurisdictions and agencies in the MPA to develop each new TIP. This is accomplished through the normal IRTC process, as well as the Administrative Committee. The Administrative Committee reviews the draft recommendations and the draft TIP. The Administrative Committee includes representative members from urban and suburban communities, and IndyGo. All agencies in good standing with the MPO participate in the final review and approval of the TIP.

4.6.3 Findings

The 2018-2021 TIP was found to be in compliance with 23 CFR 450.326.

4.7 Public Participation

4.7.1 Regulatory Basis

Sections 134(i)(5), 134(j)(1)(B) of Title 23 and Section 5303(i)(5) and 5303(j)(1)(B) of Title 49, require an MPO to provide adequate opportunity for the public to participate in and comment on the products and planning processes of the MPO. The requirements for public involvement are detailed in 23 CFR 450.316(a) and (b), which require the MPO to develop and use a documented participation plan that includes explicit procedures and strategies to include the public and other interested parties in the transportation planning process.

Specific requirements include giving adequate and timely notice of opportunities to participate in or comment on transportation issues and processes, employing visualization techniques to describe metropolitan transportation plans and TIPs, making public information readily

available in electronically accessible formats and means such as the world wide web, holding public meetings at convenient and accessible locations and times, demonstrating explicit consideration and response to public input, and a periodically reviewing of the effectiveness of the participation plan.

4.7.2 Current Status

The IMPO Public Involvement Plan (PIP) formerly known as and referenced as the PPP – Public Participation Plan, was approved May 23, 2018. The PIP is the minimum threshold for public involvement, but often in practice the IMPO goes beyond the measures.

A recommendation from the 2014 review was for the IMPO to clearly document comments received from the public. The IMPO has provided extensive detail pertaining to public comments both in the documents and on-line. Appendix A of the PIP is a reference guide for the minimum noticing for the different types of meetings, plans or processes.

IMPO has had success reaching out to the public through the use of social media including their Facebook and Twitter accounts as well as the purchasing advertising through Pandora. This offers the opportunity for targeted outreach which has proven beneficial.

4.7.3 Findings

The MPO's public participation processes, including the PIP, meet the requirements of 23 CFR 450.316, 23 CFR 450.322(i) and 23 CFR 450.324(b).

Please see Commendation and Recommendation in Section 4.8 Civil Rights.

4.8 Civil Rights (Title VI, EJ, LEP, ADA)

4.8.1 Regulatory Basis

Title VI of the Civil Rights Act of 1964, prohibits discrimination based upon race, color, and national origin. Specifically, 42 U.S.C. 2000d states that "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 be subjected to discrimination under any program or activity receiving federal financial assistance." In addition to Title VI, there are other nondiscrimination statutes that afford legal protection. These statutes include the following: Section 162 (a) of the Federal-Aid Highway Act of 1973 (23 U.S.C. 324), Age Discrimination Act of 1975, and Section 504 of the Rehabilitation Act of 1973/Americans with Disabilities Act (ADA) of 1990. ADA specifies that programs and activities funded with federal dollars are prohibited from discrimination based on disability.

Executive Order #12898 (Environmental Justice) directs federal agencies to develop strategies to address disproportionately high and adverse human health or environmental effects of their programs on minority and low-income populations. In compliance with this Executive Order, USDOT issued orders to establish policies and procedures for addressing environmental justice in minority and low-income populations. The planning regulations, at 23 CFR 450.316(a)(1)(vii), require that the needs of those “traditionally underserved” by existing transportation systems, such as low-income and/or minority households, be sought out and considered.

Executive Order # 13166 (Limited-English-Proficient) requires agencies to ensure that limited English proficiency persons are able to meaningfully access the services provided consistent with and without unduly burdening the fundamental mission of each federal agency.

4.8.2 Current Status

The Indianapolis Metropolitan Planning Organization (IMPO) has Title VI complaint procedures that include strategies for ensuring that no one is discriminated against on the basis of race, color, or national origin in the administration of its federally funded program(s). The Title VI complaint procedures were approved on November 18, 2005 and signed by the President of the Metropolitan Development Commission on December 1, 2009.

With the use of Geographic Information Systems (GIS) and United States Census Bureau’s population data, the IMPO has identified minority, low-income, limited English Proficient, and other traditionally underserved communities. Using such techniques, IMPO have directly engaged traditionally underserved communities during the development of the IMPO’s planning products.

Since the 2014 Certification Review, IMPO has used several new strategies to reach traditionally underserved populations within the metropolitan planning area. These strategies include but are not limited to the following:

- Web and Email Based Newsletter – Project updates, meeting notices, contracting opportunities, and news are emailed directly to individuals and organizations who have signed up to receive web based and email updates.
- Social Media – The MPO is currently using Facebook and Twitter to engage populations. As part of this endeavor, IMPO has linked to minority and low-income social media sites to directly engage traditionally underserved populations and organizations.
- Street Teams – IMPO use a group of staff and volunteers known as the Street Team to promote IMPO events and planning products. The Street Team reach out to citizens including the Environmental Justice (EJ) populations, by meeting them where they are.
- Local Media – IMPO has used local minority newspapers and radio stations to inform traditionally underserved communities of planning activities and products.

These EJ outreach strategies are not specifically documented in the IMPO's public involvement policies.

During the site visit, the IMPO staff requested guidance on assessing language needs of their activities and possible strategies that could be taken to improve outreach in LEP communities.

4.8.3 Findings

The IMPO Title VI Plan meets the requirements of the Civil Rights Act of 1964, Executive Order #12898 and 23 CFR 450.316(a)(1)(vii).

Commendation: The use of “out of the box” strategies to engage the traditionally underserved populations is commended. The use of the Street Teams has been adopted industry-wide as a standard line item in marketing budgets by entertainment companies, record labels, the tech industry, corporate brand marketers, new media companies and direct marketers worldwide. The fact that IMPO, with its limited budget and resources, is using Street Teams is commendable.

Recommendations: During the site visit, IMPO provided documentation as evidence of their EJ outreach endeavors. However, the strategies used to engage the EJ communities are not specifically documented in the IMPO's public involvement policies. The Review Team recommends that the IMPO incorporate these strategies into the IMPO public involvement procedures.

Recommendations: The USDOT guidance titled, “Policy Guidance Concerning Recipients’ Responsibilities to Limited English Proficient Persons (LEP)”, outlines four factors recipients should apply to the various kinds of contacts they have with the public to assess language needs and decide what reasonable steps they should take to ensure meaningful access for LEP persons. It is recommended that the IMPO perform an analysis to determine the appropriate “mix” of LEP services. The correct mix should be based on what is both necessary and reasonable in light of the four-factor analysis.

4.9 List of Obligated Projects

4.9.1 Regulatory Basis

23 U.S.C. 134(j)(7) and 23 CFR 450.334 requires that the State, the MPO, and public transportation operators cooperatively develop a listing of projects for which Federal funds under 23 U.S.C. or 49 U.S.C. Chapter 53 have been obligated in the previous year. The listing must include all federally funded projects authorized or revised to increase obligations in the preceding program year and, at a minimum, the following 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
- Identification of the agencies responsible for carrying out the project

4.9.2 Current Status

Based on current procedures, INDOT is required to provide the IMPO with obligation data within 30 days of the end of the State Fiscal year (June 30). Recent data is purported by the IMPO to be incorrect, confusing and difficult to work with and has been provided after the 30-day deadline. The quality of the data and the process has improved somewhat in recent years according to the IMPO, though it is still cumbersome and often incorrect. In the meantime, the IMPO has worked with a consultant to refine the online TIP management tool/database known as MiTIP to track federal obligation data on a nightly basis. By doing so, the MPO not only has improved project fund tracking capabilities, but has been able to obtain obligation data directly from FHWA which has allowed the MPO to easily produce the Annual List of Obligated Projects (ALOPs). PDFs of the ALOPs for the past five years are posted to the IRTIP section of the MPO's website.

The published ALOPs specifically highlights bicycle and pedestrian project obligations. The report is submitted to the MPO's reviewing agencies and posted on the MPO website each year prior to the September 30th deadline.

4.9.3 Findings

Recent ALOPs are found to be in compliance with 23 CFR 450.332.

4.10 Freight Planning

4.10.1 Regulatory Basis

The MAP-21 established in 23 U.S.C. 167 a policy to improve the condition and performance of the national freight network and achieve goals related to economic competitiveness and efficiency; congestion; productivity; safety, security, and resilience of freight movement; infrastructure condition; use of advanced technology; performance, innovation, competition, and accountability, while reducing environmental impacts.

In addition, 23 U.S.C. 134 and 23 CFR 450.306 specifically identify the need to address freight movement as part of the metropolitan transportation planning process.

4.10.2 Current Status

The MPO participated in the FHWA 2017 MPO Freight Assessment which documented current practices.

The MPO completed its first freight plan in 2015. The plan includes a vision, goals, data analysis, and identifies a regional freight network. The plan also identified the strengths, weaknesses, opportunities and threats for freight movement in the Indianapolis region. The MPO is has involved the various freight related organizations including the Conexus freight coalition, the airports and the Indiana Port Authority. The MPO is using available freight data including the Freight Analysis Framework and has received access to the National Performance Management Research Data Set.

When asked, the MPO indicated the following projects will serve industrial interests and freight movement:

- Ronald Reagan Parkway Extension
- Whitestown expansion of Anson
- New interstate exchange construction in Greenwood
- I-69 Section 6
- CR 600 W in Hancock County
- Expansion of the Indiana Intermodal facility in downtown Indianapolis

The MPO highlighted the success of the Indiana Senate Avenue Intermodal facility. Volumes in this yard have increased double-digits every year it's been open and now the railroad has partnered with a trucking firm to establish a rail-truck distribution center just south of downtown Indianapolis. The success of the yard and the associated rail-truck facility is encouraging other businesses in Central Indiana to rethink how they move bulk goods.

4.10.3 Findings

Freight and other intermodal activities are adequately considered in the planning process in accordance with the requirements.

4.11 Transportation Safety

4.11.1 Regulatory Basis

23 U.S.C. 134(h)(1)(B) requires MPOs to consider safety as one of ten planning factors. As stated in 23 CFR 450.306(a)(2), the planning process needs to consider and implement projects, strategies, and services that will increase the safety of the transportation system for motorized and non-motorized users.

In addition, SAFETEA-LU established a core safety program called the Highway Safety Improvement Program (HSIP) (23 U.S.C. 148), which introduced a mandate for states to have Strategic Highway Safety Plans (SHSPs). 23 CFR 450.306 (d) requires the metropolitan transportation planning process should be consistent with the SHSP, and other transit safety and security planning.

4.11.2 Current Status

INDOT's policy is to provide 1/3 of the apportioned HSIP funds to local agencies. INDOT then parses out amounts to each MPO (and smaller agency areas). IMPO receives a portion of this, and several of the agencies in the Indianapolis MPO area have been active in applying for and being found eligible for the use of HSIP funds. Types of projects have included, but not been limited to, pedestrian safety countermeasures, roundabouts, and intersection improvements.

Indianapolis has been identified through FHWA's Focused Approach to Safety as a Focus City for Pedestrian and Bicycle safety. Through this program, the City hosted a Vision Zero Peer Exchange which brought safety planners and engineers from 10 cities from around the country to Indianapolis. The sharing of ideas and development of networking opportunities for increasing pedestrian and bicycle safety was helpful in promoting planning and project development. The City also is near the end of the development of the PSAP (Pedestrian Safety Action Plan). This plan will supplement the pedestrian safety planning activities that have already worked through the City's government.

4.11.3 Findings

The planning process is compliant with the safety requirements found at 23 CFR 450.306(a)(2) and 23 CFR 450.306(d).

4.12 Nonmotorized Planning/Livability

4.12.1 Regulatory Basis

23 CFR 450.300(a) states that the metropolitan planning process, particularly MTPs (23 CFR 450.324(b)) and TIPs (23 CFR 450.326(e)), shall include accessible pedestrian walkways and bicycle transportation facilities as part of the intermodal transportation system for the metropolitan planning area.

23 U.S.C. 217(g) states that bicyclists and pedestrians shall be given due consideration in the comprehensive transportation plans developed by each MPO under 23 U.S.C. 134. Bicycle transportation facilities and pedestrian walkways shall be considered, where appropriate, in conjunction with all new construction and reconstruction of transportation facilities.

23 CFR 450.306 sets forth the requirement that the scope of the metropolitan planning process "will increase the safety for motorized and non-motorized users; increase the security of the transportation system for motorized and non-motorized users; and protect and enhance the environment, promote energy conservation, improve the quality of life."

4.12.2 Current Status

In the last certification review, USDOT praised the IMPO for its Multimodal Task Force for the numerous successes in implementing the Regional Bicycle Plan. USDOT also recommended the IMPO to include an item in the 2011 UPWP to update the 2005 Regional Bicycle Plan and establish consensus regarding future priorities. The MPO adopted the 2015 Regional Bikeways Plan in February 2016 as a component of the MPO's 2035 Long-Range Transportation Plan. The plan contains a snapshot of the existing bikeways network and recommendations for future investment in the bikeways system.

This first update to the regional plan provided the opportunity to both measure progress and improve the priority setting process by including the themes of Regionalism, Economic Opportunity, Connectivity and Equity.

The Regional Bicycle Plan states that there are currently 613 miles of bikeways facilities in central Indiana. Over 22% of those were built in the last five years showing exceptional growth in the provision of safe bikeway facilities. The bulk of the current system is located in the north half of Marion County and in Hamilton County. Of the existing network, 50% is located in Hamilton County, 27% in Marion County and 11% in Hendricks County. The Regional Bikeways Plan

considers bicycle planning for the entire Central Indiana region and was developed using a broad stakeholder committee. In the current version, bikeways were submitted to the fiscally-constrained plan and ranked based on a series of criteria.

During 2015-2016, MPO staff participated as part of the project management team for the Indianapolis Pedestrian Plan. This plan was managed by Health by Design and funded by a grant from the Center for Disease Control through the American Planning Association. The plan attempts to prioritize limited future resources on proposed or planned pedestrian improvement projects. The MPO may use this as a model for regional pedestrian planning. The MPO is an active participant with the City of Indianapolis in developing a Pedestrian Safety Action Plan as part of the FHWA Focus State Initiative to reduce high fatality rates.

The MPO notes that several active transportation options have sprung up in the region since the 2014 certification review, like BlueIndy, the car sharing service, and the Pacers Bikeshare. The latter was partially funded through a federal grant and provides a similar service as the BlueIndy service but its stations are located primarily on the Indianapolis Cultural Trail in downtown Indianapolis.

Beginning with the fall 2014 project funding call, Surface Transportation Block Grant (STBG) and Transportation Alternatives Program (TAP) projects in the urbanized area had to adhere to the Indianapolis MPO Complete Streets Policy or seek exemption. Complete Streets provide facilities for all users of a roadway regardless of age or ability. In Central Indiana, projects must include a sidewalk, or multi-use path on one side of the street or on-street bike lanes, with some exceptions. The policy encourages project sponsors to provide facilities for all users in their projects. There are certain exceptions to the rule, including excluding limited access thoroughfares like Binford Boulevard.

4.12.3 Findings

The federal review team finds the IMPO bike/pedestrian planning process complies with 23 CFR 450.300(a), 23 CFR 450.322(f)(8), and 23 CFR 450.324(c).

4.13 Integration of Land Use and Transportation

4.13.1 Regulatory Basis

23 U.S.C. 134(g)(3) encourages MPOs to consult with officials responsible for other types of planning activities that are affected by transportation in the area (including State and local planned growth, economic development, environmental protection, airport operations, and freight movements) or to coordinate its planning process, to the maximum extent practicable, with such planning activities.

23 U.S.C. 134 (h)(1)(E) and 23 CFR 450.306(a)(5) set forth requirements for the MPO Plan to protect and enhance the environment, promote energy conservation, improve the quality of life, and promote consistency between transportation improvements and State and local planned growth and economic development patterns.

4.13.2 Current Status

With no direct land use authority MPO staff serves a critical support role for local planning departments, most often by providing analysis as well as convener. Under the newly approved independent structure of the MPO, there may be more opportunity for integration of land use and transportation which is encouraged. However, currently IMPO leads the analysis for transit oriented development (TOD) around transit stations. The IMPO TOD Strategic Plan won the Indiana Planning Association's Award for Outstanding Economic Development Plan and the City of Indianapolis formally adopted the Red Line sections as the plan of record.

4.13.3 Findings

The planning process is compliant with planning requirements found at 23 CFR 450.306(a)(5).

4.14 Travel Demand Forecasting

4.14.1 Regulatory Basis

23 CFR 450.324(f)(1) requires that the MTP include the projected transportation demand of persons and goods in the MPA over the period of the transportation plan. Travel demand forecasting models are used in the planning process to identify deficiencies in future year transportation systems and evaluate the impacts of alternative transportation investments. In air quality nonattainment and maintenance areas, they are also used to estimate regional vehicle activity for use in mobile source emission models that support air quality conformity determinations.

4.14.2 Current Status

The projected transportation demand is determined based on the IMPO travel demand forecasting model. The model uses the forecasted changes in socioeconomic factors such as population, employment, and average household income to project future travel demand. A traditional daily four-step process is used: trip generation, trip distribution, mode choice, and trip assignment. Truck trip productions and attractions are determined using the Quick Response Freight Model. The principal sources of changes in travel behavior are the Onboard Transit Survey (last performed in 2017), and the Household Travel Survey (last conducted in 2009). The results of these surveys are used during re-calibration efforts in the travel demand model. The last major re-calibration effort was conducted in 2014. Plans to calibrate model to account for the results of the 2017 Onboard Survey and travel speeds will be included in the

next UPWP update. The MPO continues to invest an appropriate level of effort to update the model.

4.14.3 Findings

IMPO meets the federal requirements for travel demand modeling.

Commendation – With the recent adoption of performance measures and the need to start planning for the next household travel survey, the IMPO embarked on a Data, Analytics, and Modeling Plan. The plan evaluated current tools, data purchases, and staff needs for the core data functions of the MPO. The result was a detailed, year-by-year schedule of the data purchases and the development of analytical tools necessary to support the next two long-range planning cycles. This comprehensive strategy will ensure optimal sequencing of MPO modeling initiatives, systematically expanding in-house resources and capabilities that will support planning best practices.

4.15 Air Quality

4.15.1 Regulatory Basis

The air quality provisions of the Clean Air Act (42 U.S.C. 7401) and the MPO provisions of Titles 23 and 49 require a planning process that integrates air quality and metropolitan transportation planning, such that transportation investments support clean air goals. Under 23 CFR 450.324(m), a conformity determination must be made on any updated or amended transportation plan in accordance with the Clean Air Act and the EPA transportation conformity regulations of 40 CFR Part 93. A conformity determination must also be made on any updated or amended TIP, per 23 CFR 450.326(a).

4.15.2 Current Status

On October 24, 2016, the USEPA's revocation of the 1997 National Ambient Air Quality Standards for Particulate Matter 2.5 became effective. The counties of Hamilton, Hendricks, Johnson, Marion, and Morgan counties had been considered a Maintenance area for PM 2.5 since July 11, 2013.

Regarding Carbon Monoxide, a very small portion of Marion County in downtown Indianapolis had become a Maintenance area on March 20, 2000. The county will then become an Attainment area on March 20, 2020.

All 9 counties in the IMPO MPA was classified as Maintenance for Ozone (8-Hour 1997) on October 19, 2007. The county would then become an Attainment area on October 19, 2020. On April 6, 2015, the USEPA revoked the 8-Hour Ozone (1997) Standard. However, a lawsuit challenged the revocation and the judicial system sided with plaintiff, thereby requiring an

emissions analysis for Ozone (8-Hour 1997). The requirement for an emissions analysis be completed does not make the 9 counties again classified as Maintenance for Ozone.

On September 14, 2018, the Court issued an Order staying its decision with respect to transportation conformity until February 16, 2019. FHWA and FTA are not allowed to approve new or updated LRTP and TIPs (with non-exempt projects) after that date unless a conformity analysis shows that emissions are within emissions budget allowed by the USEPA. A recent emissions analysis for TIP and Plan amendments resulted in the air quality emissions to be within the emissions budget allowed by the USEPA.

4.15.3 Findings

The planning partner's processes were found to be compliant with 23 CFR 450.324 and 23 CFR 450.326.

4.16 Congestion Management Process / Management and Operations

4.16.1 Regulatory Basis

23 U.S.C. 134(k)(3) and 23 CFR 450.322 set forth requirements for the congestion management process (CMP) in TMAs. The CMP is a systematic approach for managing congestion through a process that provides for a safe and effective integrated management and operation of the multimodal transportation system. TMAs designated as nonattainment for ozone must also provide an analysis of the need for additional capacity for a proposed improvement over travel demand reduction, and operational management strategies.

23 CFR 450.324(f)(5) requires the MTP include Management and Operations (M&O) of the transportation network as an integrated, multimodal approach to optimize the performance of the existing transportation infrastructure. Effective M&O strategies include measurable regional operations goals and objectives and specific performance measures to optimize system performance.

4.16.2 Current Status

The previous certification review in 2014 resulted in a recommendation that the IMPO reevaluate its procedures for selecting and rating major capital investment projects in the MTP. It was also recommended that the chosen methodology more transparently demonstrate inclusion of the CMP and consideration of comprehensive/ conventional benefit-cost analysis on a project-level basis.

The recent major update to the IMPO's LRTP included an update of the CMP. The new process included a comprehensive evaluation of all regionally significant projects planned through 2045,

as well as a process to evaluate projects prior to them being amended into the LRTP. Each project received a score based on performance measures determined by the 2045 LRTP Steering Committee (SC). Several months were taken by the SC to fully vet available data to make sure the measures represented the values and concerns of the IRTC Committees, stakeholders, and the general public. All projects in the LRTP meet the CMP requirements. The updated CMP procedures direct project sponsors to submit applicable information for the CMP analysis. As a result, capacity-adding projects will have undergone a CMP analysis before the project is recommended for amendment into the LRTP.

The IMPO did not do a traditional benefit/cost analysis knowing that some projects will naturally cost more than others. They indicated that they wanted to understand the benefits first. However, they did do a full financial forecast, and the 2045 LRTP is fiscally constrained. The IMPO staff reviewed each LRTP project and its potential impact on congestion through the CMP process. The MPO used a four tier CMP worksheet on projects to understand impact to the region.

4.16.3 Findings

The planning process is compliant with planning requirements found at 23 CFR 450.322 and 23 CFR 450.324(f)(5).

4.17 Financial Planning

4.17.1 Regulatory Basis

23 CFR 450.324(f)(11) and 23 CFR 450.326(j),(k) outline financial planning requirements to support MTP and TIP implementation as follows:

- Revenue estimates shall be cooperatively developed by State, MPO, and public transportation operator(s), and include all public and private sources reasonably expected to support plan implementation.
- For nonattainment and maintenance areas, recommendations for additional financing strategies shall also be included in the MTP. Nonattainment and maintenance area projects included in the first two years of the TIP shall have funds available or committed; eligible TCM projects shall have priority.
- System level cost estimates shall be identified for system M&O, incorporate inflation rates reflecting year of expenditure (YOE), and demonstrate consistency with existing

and proposed revenue sources with all forecasted O&M and project costs. For outer years (beyond 10 years), cost ranges or bands are acceptable.

- The financial plan may include additional projects if additional resources outside of the financial plan are identified.
- The TIP shall be fiscally constrained by year, and be updated to maintain consistency.

4.17.2 Current Status

The current MTP contains separate sections on roadway (all expansion projects) and transit fiscal constraint. For the roadway element, revenue sources are identified and expected funding is projected based upon past trends and other criteria. Non-INDOT roadway revenue projections are based primarily on transportation revenue reports filed by local units of government with the State Board of Accounts. Other revenue forecasts are based upon data from the Transportation Motor Vehicle Highway Fund, Arterial Road & Street Fund, Parking Meter funds, City/County Cumulative Fund, Wheel taxes and Federal Funds. Different revenue sources have various rates of growth depending on the type of revenue. Expected revenue amounts are provided in both current and YOY.

Roadway expansion cost estimates and related information was developed in coordination with the project sponsors. The roadway projects are listed in table format with the following identifying information: MPO identification number, sponsor, facility, location, project description, funding period by phase, and cost estimate by phase and project. The total estimated project costs are compared with the revenue projections to demonstrate fiscal constraint. The IMPO utilizes an annual revenue growth rate of 2.4% in the MTP (2016 – 2045).

4.17.3 Findings

The planning process is compliant with financial planning requirements found at 23 CFR 450.324(f)(11), 23 CFR 450.326(j), and 23 CFR 450.326(k).

4.18 Self-Certifications

4.18.1 Regulatory Basis

Self-certification of the metropolitan transportation planning process, at least once every four years, is required under 23 CFR 450.334. The State and the MPO shall certify to FHWA and FTA at least every four years that the metropolitan transportation planning process is being carried out in accordance with all applicable requirements of 23 CFR 450.300 and

- 1) [23 U.S.C. 134](#), [49 U.S.C. 5303](#), and this subpart;
- 2) In nonattainment and maintenance areas, sections 174 and 176 (c) and (d) of the Clean Air Act, as amended ([42 U.S.C. 7504](#), [7506](#) (c) and (d)) and 40 CFR part 93;

- 3) Title VI of the Civil Rights Act of 1964, as amended ([42 U.S.C. 2000d-1](#)) and 49 CFR part 21;
- 4) [49 U.S.C. 5332](#), prohibiting discrimination on the basis of race, color, creed, national origin, sex, or age in employment or business opportunity;
- 5) Section 1101(b) of the SAFETEA-LU (Pub. L. 109-59) and 49 CFR part 26 regarding the involvement of disadvantaged business enterprises in USDOT funded projects;
- 6) [23 CFR](#) part 230, regarding the implementation of an equal employment opportunity program on Federal and Federal-aid highway construction contracts;
- 7) The provisions of the Americans with Disabilities Act of 1990 (*et seq.*) and 49 CFR [27](#), [37](#) and [38](#);
- 8) The Older Americans Act, as amended ([42 U.S.C. 6101](#)), prohibiting discrimination on the basis of age in programs or activities receiving Federal financial assistance;
- 9) Section 324 of Title 23 U.S.C. regarding the prohibition of discrimination based on gender; and
- 10) Section 504 of the Rehabilitation Act of 1973 ([29 U.S.C. 794](#)) and 49 CFR part 27 regarding discrimination against individuals with disabilities

4.18.2 Current Status

IMPO submits a self-certification as part of each new Indianapolis Regional Transportation Improvement Program, the latest of which is dated March 3, 2017.

4.18.3 Findings

The self-certification statement was found to be in compliance with the requirements.

4.19 Visualization Techniques

4.19.1 Regulatory Basis

The requirements for the use of visualization techniques in metropolitan plans and TIPs can be found as part of 23 CFR 450.316(a)(1)(iii). It states that, “The MPO shall develop the participation plan in consultation with all interested parties and shall, at a minimum, describe explicit procedures, strategies, and desired outcomes for... Employing visualization techniques to describe metropolitan transportation plans and TIPs...”.

4.19.2 Current Status

An update of the IMPO Public Involvement Plan was approved on May 23, 2018. It was developed in coordination with a wide range of stakeholder groups. The IMPO utilizes many visualization techniques in many products generated to communicate information. Specifically, the MPO Frequently Asked Questions Book is a concise 6-page document that very effectively

communicates basic information about the MPO, it's goals, core functions, how decisions are made, as well as highlighting staff members and their responsibilities. Other exemplary examples of effective visualization include the Transit Plan video, the MiTIP - (web-based TIP management) a short TIP amendment summary developed with each amendment that shows the state of implementing the projects in the TIP, and the LRTP itself.

4.19.3 Findings

The planning process is compliant with planning requirements found at 23 CFR 450.316(a)(1)(iii).

Commendation:

The IMPO is commended for the exemplary visualization techniques used in many products generated to communicate information. Specifically, the MPO Frequently Asked Questions Book, the Transit Plan video, and the MiTIP amendment summary.

4.20 Performance-Based Planning and Programming

4.20.1 Regulatory Basis

The requirements for performance-based planning and programming (PBPP) were published May 27, 2016 and became effective on June 27, 2016. See 23 CFR 450, 23 CFR 771, and 49 CFR 613. The updated planning rule has a phase-in date of May 27, 2018 (or two years after the publication date).

The PBPP regulations have only recently been fully phased in. As such, only a few of the deadlines for actions have passed. The program areas where measures have been identified are safety, pavement, bridge, system performance, freight, traffic congestion, and air quality emissions. The State DOT is required to set targets for each measure, and each MPO is required to set targets for each measure 180 days after the State DOT's deadline. MPOs may either establish their own targets or officially support the State DOT's targets. Some MPOs are required to establish their own separate measures regarding traffic congestion and air quality emissions, as well as provide the State DOT with a CMAQ Performance Plan.

4.20.2 Current Status

To date, the MPOs have only been required to establish targets for the PBPP measures. The IMPO have chosen to support INDOT with their measures. The IMPO was one of the MPOs required to establish their own separate measures regarding traffic congestion and air quality emissions, as well as provide the State DOT with a CMAQ Performance Plan. They have done so

in coordination with INDOT and have provided the CMAQ Performance Plan to INDOT by the October 1, 2018 deadline.

4.20.3 Findings

The planning process is compliant with planning requirements found at 23 CFR 450, 23 CFR 771, and 49 CFR 613.

5.0 CONCLUSION AND RECOMMENDATIONS

The FHWA and FTA review found that the metropolitan transportation planning process conducted in the Indianapolis, Indiana urbanized area MEETS Federal planning requirements as follows.

5.1 Commendations

The following are noteworthy practices that the IMPO is doing well in the transportation planning process:

1. Restructuring – FHWA and FTA commends the IMPO for their efforts in transportation-related and regionally-focused economic development, land use, and water planning. To this end, the IMPO developed a Strategic Plan which was unanimously adopted by the policy board in August 2018. This Plan details a multi-step process for becoming an independent organization by mid-2020, then expanding the MPO's charge in these other areas.
2. Transit Expansion – The IMPO's transit planning process has already been successfully applied in Marion and Hamilton Counties. In 2019, it is anticipated that the Central Indiana Transit Plan will add new chapters as the MPO replicates this process to inform the scheduled Guilford Township (City of Plainfield) transit referendum, as well as potential 2020 referenda in suburban Pleasant Township (City of Greenwood), Clay Township (City of Carmel), and Washington Township (City of Westfield). The FHWA and FTA commends the IMPO, IndyGo, CIRTa and all the local governments in the transit successes in recent years and encourage all parties involved to continue the momentum to successfully expand transit beyond Marion County.
3. EJ Outreach Strategies used – The use of "out of the box" strategies to engage the traditionally underserved populations is commended. The use of the Street Teams has been adopted as a standard line item in marketing budgets for other industries including entertainment companies, record labels, the tech industry, corporate brand marketers,

new media companies and direct marketers worldwide. The fact that IMPO with its limited budget and resources is using Street Teams is commendable.

4. Data Analytics and Modeling Plan – With the recent adoption of performance measures and the need to start planning for the next household travel survey, the IMPO embarked on a Data, Analytics, and Modeling Plan. The plan evaluated current tools, data purchases, and staff needs for the core data functions of the MPO. The result was a detailed, year-by-year schedule of the data purchases and the development of analytical tools necessary to support the next two long-range planning cycles. This comprehensive strategy will ensure optimal sequencing of MPO modeling initiatives, systematically expanding in-house resources and capabilities that will support planning best practices.
5. Visualization – The IMPO is commended for the exemplary visualization techniques used in many products generated to communicate information. Specifically, the MPO Frequently Asked Questions Book is a concise 6-page document that very effectively communicates basic information about the MPO, its goals, core functions, how decisions are made, as well as highlighting staff members and their responsibilities. Other exemplary examples of effective visualization include the Transit Plan video, the MiTIP - (web-based TIP management) a short TIP amendment summary developed with each amendment that shows the state of implementing the projects in the TIP, and the LRTP itself.

5.2 Corrective Actions

There are no Corrective Actions needed to comply with Federal Regulations.

5.3 Recommendations

The following are recommendations that would improve the transportation planning process:

1. Distribution of FHWA Planning funds to MPOs – The IMPO has expressed deep concerns over how the FHWA Planning (PL) funds are distributed and makes the Indianapolis MPO the sole “donor region”. FHWA and FTA recommends that the INDOT and the IMPO work together to determine how this may be resolved.
2. EJ Outreach Strategies – During the site visit, IMPO provided documentation as evidence of their EJ outreach endeavors. However, the strategies used to engage the EJ communities are not specifically documented in the IMPO’s public involvement policies. The Review Team recommends that the IMPO incorporate these strategies into the IMPO public involvement procedures.

3. English Proficiency Persons – The USDOT guidance entitled, “Policy Guidance Concerning Recipients’ Responsibilities to Limited English Proficient Persons (LEP)”, outlines four factors recipients should apply to the various kinds of contacts they have with the public to assess language needs and decide what reasonable steps they should take to ensure meaningful access for LEP persons. It is recommended that the IMPO perform an analysis to determine the appropriate “mix” of LEP services. The correct mix should be based on what is both necessary and reasonable in light of the four-factor analysis.

APPENDIX A - PARTICIPANTS

The following individuals were involved in the Indianapolis urbanized area on-site review:

- Robert Dirks, FHWA Indiana Division
- Antonio Johnson, FHWA Indiana Division
- Joyce Newland, FHWA Indiana Division
- Amanda Rice, FHWA
- Susan Weber, FTA Region 5
- Anna Gremling, Indianapolis MPO
- Sean Northup, Indianapolis MPO
- Anita Bjork, Indianapolis MPO
- Steve Cunningham, Indianapolis MPO
- Jennifer Dunn, Indianapolis MPO
- Taylor Firestine, Indianapolis MPO
- Jen Higginbotham, Indianapolis MPO
- Ward Kennedy, Indianapolis MPO
- Catherine Kostyn, Indianapolis MPO
- James Rinehart, Indianapolis MPO
- Kristyn Sanchez, Indianapolis MPO
- Nathaniel Simmons, Indianapolis MPO
- Andrew Swenson, Indianapolis MPO
- Jay Mitchell, INDOT
- Immanuel Nsonwu, INDOT
- Larry Buckel, INDOT
- Mike Terry, IndyGo
- Philip Roth, CIRTA
- Annie Dixon, CIRTA

APPENDIX B - STATUS OF FINDINGS FROM LAST REVIEW

One of the priorities of each certification review is assessing how well the planning partners in the area have addressed corrective actions and recommendations from the previous certification review. This section identifies the corrective actions and recommendations from the previous certification and summarizes discussions of how they have been addressed.

Recommendation 1: In accordance with guidance under development by FHWA and FTA pursuant to MAP-21, IMPO, INDOT, IndyGo and CIRTAs should coordinate as appropriate in developing asset management systems for pavement, bridges, and transit. The planning partners should collect data and set targets to measure progress for the following core performance measures: pavement condition; transit state of good repair; highway safety; transit safety; traffic congestion; emissions; and freight movement.

Disposition:

The Indianapolis MPO has been active both in collecting new data and working with INDOT and their IRTC to set and/or adopt targets. The IMPO has also been creating a repository for existing and new data collected by LPA partners. Most recent involvement in data collection took place in the fall of 2017. The IMPO partnered with the Indianapolis Department of Public Works (DPW) to collect and score over 2000 lane-miles of thoroughfare pavements. This was the first data collection/evaluation made on those streets since an IMPO/DPW project completed in 2009. The 2017 project involved automated data collection and a complete video record of the collection routes. The 2017 project came in at half the cost of the 2009 project (\$300,000 versus \$600,000).

Data from DPW and other LPA partners and from INDOT has been stored online with their MiTIP Pavement repository. Tools have been built to provide remote data entry and 5-year pavement investment plans based on individual LPA pavement deterioration curves derived from historical data for those LPAs. With the recent requirement of the Community Crossings grant requiring asset management plans, most LPAs have asset management plans and the IMPO is incorporating the data within the MPOs data in MITIP.

Highway safety:

The IMPO worked with INDOT and the IRTC to review and develop safety performance measures and safety targets. Ultimately, the IRTC adopted the State's safety targets and these were incorporated into the LRTP and amended into the TIP. Despite past difficulties in identifying and programming safety projects with federal HSIP funds, the IMPO has improved the utilization of these funds through data development with the IMPO's Top 50 Intersection studies and their annual call for projects.

In addition, the IMPO continues to work on creating reliable location references for all fatal and serious crash records from 2012-2017. Since the City of Indianapolis has been designated a

Focus City, the IMPO has targeted pedestrian and bicycle crashes first to feed into their bike and pedestrian planning work in 2018. The remainder of the cleanup is planned by the IMPO to be completed in early 2019. These improved data sets will serve as the basis for evaluation of safety performance measures.

Transit state of good repair & Transit Safety

IndyGo is currently developing its federal performance measures, as outlined in MAP-21, reinforced in the FAST-Act and promulgated in federal regulations. IndyGo staff has reviewed the federal requirements. Recently, IndyGo staff met in March to continue to refine IndyGo's processes, including data collection and responsible staff and met again in April to further delineate responsibilities and outline a timeline. IndyGo will coordinate its efforts with the IMPO, including details on its measures and process.

Traffic Congestion:

The IMPO has conducted an evaluation of the NPMRDS data set for the region. Tools are being made available at the national level for the NHS system. All but one of two roadways in the NHS system are the responsibility of INDOT. The IMPO has quotes from the current NPMRDS team (RITIS) for NPMRDS-formatted data and analysis tools for non-NHS roads in the TMS data set for the region. Those data sets would provide metrics for monitoring congestion on the regional network for performance measures and for identifying congested corridors.

Speed data is also useful for calibrating the IMPO travel demand model (TDM) to provide a basis for modeling new project impacts on their congestion and delay performance measures. The IMPO acquired traffic speed data from HERE data for all its model network links as a part of its model update process in 2016-2017. This data, and the NPMRDS data, will both be used in the model calibration process.

The IMPO reviewed LRTP projects through analysis guided by the Congestion Management Process. This work began collecting planning data on project level basis with the intent of strengthening future Congestion Management Process as it relates to the LRTP. Projects were analyzed using a four tier CMP worksheet. Part of the analysis included whether a LRTP project was on an identified congested link or in an identified corridor.

Emissions:

The Indianapolis area was re-designated as attainment and is now considered a maintenance area for ozone and PM2.5. However, the IMPO continues to update its emissions rates using the most recent EPA MOVES tools. These rates and VMT calculated by the travel demand model are used to calculate emissions for the region. In addition, the Indianapolis MPA continues to receive an annual CMAQ allocation which is used to program projects that quantify emissions reductions.

Freight Movement:

As part of the Regional Freight Plan for the Indianapolis MPA adopted in January 2016, the IMPO identified the regional freight network, established freight policy goals and relating performance measures. Projects were given scoring preference if they were identified in the freight plan when selecting projects for the 2045 LRTP.

INDOT has licensed the Transearch freight planning tool (Global Insight) for MPO use. The IMPO is also considering the licensing of truck data from ATRI (American Transportation Research Institute) and will be integrating this data into their freight planning processes.

Recommendation 2: It is recommended that the MPO reevaluate its procedures for selecting and rating major capital investment projects in the MTP. The chosen methodology should more transparently demonstrate inclusion of the CMP and consideration of comprehensive/conventional benefit-cost analysis on a project-level basis.

Disposition:

The recent major update to the MPO's Long Range Transportation Plan (LRTP) included a comprehensive evaluation of all regionally significant projects planned through 2045.

Each project received a score based on performance measures determined by the 2045 LRTP Steering Committee (SC). Several months were taken by the SC to fully vet available data to make sure the measures represented the values and concerns of our IRTC Committees, stakeholders, and the general public. The MPO did not do a traditional benefit/cost analysis knowing that some projects will naturally cost more than others; they wanted to understand the benefits first. That said, they did do a full financial forecast and the 2045 LRTP is fiscally constrained. MPO staff reviewed each LRTP project and its potential impact on congestion through the CMP Process. The MPO used a four tier CMP worksheet on projects to understand impact to the region.

Recommendation 3: It is recommended that thorough and transparent scenario planning is integrated into the forthcoming update of the MTP by considering land use and transportation alternatives. Selection of the preferred scenario should be based on targeted improvements to baseline conditions for the performance measures identified in MAP-21 and forthcoming rulemaking. The planning partners are also encouraged to base the preferred scenario on improvements in comprehensive locally-determined metrics that address the planning factors at 23 CFR 450.306(a) and the Partnership for Sustainable Communities (PSC) goals/objectives.

Disposition:

During the past four years, the Indianapolis MPO spent a considerable amount of time developing tools that modeled the interaction of transportation projects and land use development. Since 2014 they expanded their data section to include one full time staff person

to assist with the development of scenarios and data analysis. This step was a necessary to understand how MPO transportation investments might support scenario planning.

Over the past four years, the MPO developed two functional land use forecast models for the MPA using UrbanSIM and Cube Land. For the LRTP, they created a functional forecast using an ensemble approach that utilized the output of 3 different model processes, including Cube Land model output. This forecast will be the basis of their ongoing scenario planning efforts.

With a long-range forecast in place, they are currently seeking strategic advice concerning the best tools and methods to use for developing scenarios and understanding how their LRTP projects might support each scenario.

Recommendation 4: The MTP does not have estimates of costs reasonably expected for public transportation pursuant to 23 CFR 450.322(10)(i). Documentation needs to be improved to demonstrate fiscal constraint and sufficient resources to adequately operate service so that the analysis is transparent to the public.

Disposition:

The 2045 LRTP (MTP) has the Marion County Transit Plan (MCTP) incorporated and this information is now transparent to the public. The 2045 LRTP does include a more robust financial forecast, especially for transit. It incorporates anticipated federal dollars based on historical data, and, it includes recent funding sources at the state and local level recently approved by the state legislature (HB 1002) and Indianapolis city-county council (local income tax increase for transit).

Recommendation 5 – It is recommended that IMPO and INDOT transparently evaluate corridor-level congestion pricing in addition to system-wide vehicle miles travelled (VMT) and fuel pricing to reduce the demand for Single-Occupancy Vehicle transport as part of the congestion management process (CMP). The potential benefits could be demonstrated using known elasticities on the effects of pricing and land use design on VMT and alternate modes. Documentation should include implementation challenges. For example, the Chicago Metropolitan Agency for Planning (CMAP) has exhibited best practices in their impacts analysis of proposed congestion pricing.

Disposition:

Currently, the Indianapolis MPO is working with INDOT on their HEA 1002 tolling study. The Indianapolis MPO advised INDOT in the selection of the consultant team. As the project moves forward the INDOT consulting team will be working with the MPO and giving presentations to the Indianapolis Regional Transportation Council during key milestones throughout the project.

However, the idea of congestion pricing and fuel pricing have not found traction at the planning or policy level within the Indianapolis MPA. These ideas were discussed again during the LRTP update with the stakeholder committee and no action was recommended.

Recommendation 6: It is recommended that IMPO revise the SFY2012 and 2013 annual list of obligated projects reports to include CIRTA projects. The revised documents should be posted on the MPO's web site to fully meet the requirements of 23 CFR 450.332. The SFY 2012 and 2013 Annual List of Obligated Projects were updated to include any obligations for CIRTA projects.

Disposition:

The MPO consistently includes CIRTA in its Annual Listing of Obligated Projects. The MPO posts the five most recent ALOPs on it's website.

Recommendation 7: It is recommended that IMPO provide details on the potential environmental mitigation activities to be considered during implementation of the next MTP. This should include the quantitative or qualitative value of each strategy, level of consideration, and specific input from the consulting parties.

The 2045 LRTP included a Red Flag Analysis for each project in the first time/funding period (2016 – 2025). These were provided to LPAs to build upon in the project development process and to assist with better cost estimating.

Recommendation 8: It is recommended that IMPO clearly document comments received from the public in future iterations (including online) of the PPP, MTP, TIP, and other planning documents as appropriate. This should include the number of persons providing input, exact information received, and responses made to the commenters to improve transparency to the public.

Disposition:

The MPO has provided extensive detail pertaining to public comments both in the documents themselves and on-line. Specific comments from the public are included and MPO staff responses to each comment are included in the documentation as well. Plans, programs and studies that generate extensive public comment are also summarized to capture the most significant comments. A memorandum to the IRTC Policy Committee is provided prior to public hearings in which a vote is taken and a summarized presentation of public comments is made at the meeting. All approval actions on the PPP, LRTP and TIP are done so during a public hearing.

Recommendation 9: It is recommended that IMPO improve transparency to the public in its environmental justice benefits and burdens analysis on the impacts of planned transportation projects to minority and low-income populations. This should include examination of travel times by mode to employment and community amenities for these populations compared to

the overall population. An example of best practices can be found in the Northwestern Indiana Regional Planning Commission (NIRPC) 2040 Comprehensive Regional Plan.

Disposition:

From the 2045 LRTP:

“How the transportation network affects the most disadvantaged segments of the population is a key concern of the Indianapolis MPO. As such, as part of the 2045 LRTP planning process, the Steering Committee took considerable time over the course of numerous meetings to develop different metrics to evaluate the network and its effect on Environmental Justice Areas of Concern. For the purposes of a network evaluation, the metric to be evaluated is the difference between job accessibility for a non-EJ area by a 30-minute automobile commute and an EJ area by a 60 minute transit commute. Travel demand model estimates indicate overall decreases in accessibility for both EJ and non-EJ areas. However, it should be noted that the travel demand model can only estimate impacts of projects that are roadway capacity and transit capital in nature.”

The Transportation Improvement Program includes a narrative that addresses Environmental Justice issues as it relates to the projects in the program. The analysis is consistent with the MPO’s LRTP EJ goals and analysis focusing on the two key indicators, and includes all five indicators.

Recommendation 10: In accordance with the *United States Department of Transportation Policy Statement on Bicycle and Pedestrian Accommodation Regulations and Recommendations*, IMPO is encouraged to expand its collection of data on non-motorized travel, set mode share targets, and measure performance.

Disposition:

In 2015 the Indianapolis MPO was selected of one of 10 MPOs to participate in the FHWA Bicycle-Pedestrian Count Technology Pilot Project. The MPO received a \$20,000 grant and used that grant to fund six (6) counters. Those six counters included three pedestrian and three bike trail counters. The MPO deployed the counters in different locations during the study. They shared the results of their experience with the FHWA test sponsors. Results of the study were published in 2016.

In addition to the national study, the MPO has also reached out to its LPA partners to collect bicycle and pedestrian count data and have been exploring different public sources (e.g. Stavra). They have been considering different count data collection and storage solutions for non-motorized travel as they consider count data storage solutions for motorized vehicles.

It is important to note under the “Move” goals within the 2045 LRTP, and as part of performance measures they will be monitoring their connected network or bikeways and

pedestrian routes as they expand existing facilities and close gaps. They also make sure projects are compliant with our Complete Streets requirements and they are considering requesting trail/path utilization reports from LPAs for projects that have received federal funding.

APPENDIX C – PUBLIC COMMENTS

A public hearing was held the evening of June 12, 2018. In addition to the FHWA/FTA review team and some MPO staff, two members of the public attended. Those two individuals chose not to make any public comment on the regional transportation planning process.

APPENDIX D - LIST OF ACRONYMS

ADA: Americans with Disabilities Act
AMPO: Association of Metropolitan Planning Organizations
CAA: Clean Air Act
CFR: Code of Federal Regulations
CMP: Congestion Management Process
CO: Carbon Monoxide
DOT: Department of Transportation
EJ: Environmental Justice
FAST: Fixing America's Surface Transportation Act
FHWA: Federal Highway Administration
FTA: Federal Transit Administration
FY: Fiscal Year
HSIP: Highway Safety Improvement Program
ITS: Intelligent Transportation Systems
LEP: Limited-English-Proficiency
M&O: Management and Operations
MAP-21: Moving Ahead for Progress in the 21st Century
MPA: Metropolitan Planning Area
MPO: Metropolitan Planning Organization
MTP: Metropolitan Transportation Plan
NAAQS: National Ambient Air Quality Standards
NO₂: Nitrogen Dioxide
O₃: Ozone
PM₁₀ and PM_{2.5}: Particulate Matter
SHSP: Strategic Highway Safety Plan
STIP: State Transportation Improvement Program
TDM: Travel Demand Management
TIP: Transportation Improvement Program
TMA: Transportation Management Area
U.S.C.: United States Code
UPWP: Unified Planning Work Program
USDOT: United States Department of Transportation



Report prepared by:

**FHWA Indiana Division Office
575 N. Pennsylvania St., Room 254
Indianapolis, Indiana 46204
317-226-7475**

**FTA Region V Office
200 W. Adams Street, Suite 320
Chicago, Illinois 60606
312-353-3888**