Indianapolis Metropolitan Planning Organization
Complete Streets Policy

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1.0 Defined

Complete Streets are roadways designed to safely and comfortably accommodate all users, of all ages and abilities, including but not limited to motorists, cyclists, pedestrians, transit users, school bus riders, delivery and service personnel, freight haulers, and emergency responders.

Publicly owned rights of way should safely accommodate destination-based and recreational users as well as provide opportunities as appropriate for rest and directional information within the public realm.

2.0 Introduction/Justification

Building complete streets provides many benefits to residents, business owners, developers, and the community as a whole. First and foremost, embracing the complete streets concept will help create balanced transportation systems by providing accessible, safe, and efficient connections between destinations. It will bolster economic growth and stability while increasing property values. It will enhance job growth, improve safety, improve public health and fitness, reduce harmful emissions, and reduce the overall demand on our roadways by allowing people to replace motor vehicle trips with active transportation options. Secondly, integrating sidewalks, bike facilities, transit amenities, and safe crossings into the initial design of a project spares the expense and complications of retrofits implemented at a later date. Thirdly, proactively planning for a multimodal transportation system can promote its integration with land use policies to encourage sustainable development.

In 2010 the Indianapolis Metropolitan Planning Organization (IMPO) engaged in a series of intensive public engagements during the development of the 2035 Long Range Transportation Plan (LRTP), also known as the Indy Connect initiative. The LRTP includes several different types of transportation modes—buses, rail, road, bikeways, sidewalks, and others— all working together to serve residents in Boone, Hamilton, Hancock, Hendricks, Johnson, Marion, Morgan and Shelby counties. Since that time, a copious amount of additional public outreach has occurred, much of it highlighting ongoing community interest in implementing complete streets principals.

The IMPO has developed this Complete Streets policy in response to (1) comments received through the LRTP planning process, (2) encouragement by the Federal Highway Administration and other stakeholder groups, and (3) all of the safety, health, environmental, and economic reasons stated above.
The 2045 LRTP has instilled the same goals for complete streets as the predeceasing plan. It references the IMPO’s Complete Street Policy as the guiding document for funding infrastructure projects seeking Federal-STBG and TAP funding.

The IMPO Complete Streets Policy also supports compliance with Federal policy [United States Code, Title 23, Chapter 2, Section 217 (23 USC 217)] requiring consideration for bicycling and walking within transportation infrastructure.

3.0 Vision & Intent
To create a safe, balanced, and effective transportation system where every roadway user can travel safely and comfortably and where multi-modal transportation options are available to everyone.

The goals of this Complete Streets Policy are:
1) To create a comprehensive, integrated, and connected transportation network that supports compact, sustainable development and provides livable communities.
2) To ensure safety, ease of use, and ease of transfer between modes for all users of the transportation system.
3) To provide flexibility for different types of streets, areas, and travelers to enhance the transportation experience.

(Note: In the case of constructing a new roundabout, each roadway accessing the roundabout needs to have a sidewalk, bike lane, or multi-use path on at least one side.)

4.0 Applicability
4.1 Jurisdiction
The recommendations and requirements within the IMPO Complete Streets Policy will apply to Surface Transportation Block Grant (STBG) and Transportation Alternatives Program (TAP) projects within the urbanized area boundary (UAB). Projects proposing to improve a corridor that runs along the UAB will be considered to be within the UAB.

Applicable projects include all roadway and/or intersection reconstruction projects, added travel lane(s) projects, new roadways, and new or rehabilitated bridges (including bridge decks reconstructed over the Interstate and underpasses under reconstructed/new interchanges).

Projects funded under the Highway Safety Improvement Program (HSIP) and the Congestion Mitigation and Air Quality program (CMAQ) are excluded from this policy. Both funding categories award funding after considering cost/benefit analysis. Complete streets elements could affect the cost/benefit ratio by increasing the cost without a proportional increase in benefits (safety benefits for HSIP and emissions reductions for CMAQ).

The IMPO recognizes that some Local Public Agencies (LPAs) have adopted their own Complete Streets Policies. When applied to the federally funded projects as listed above, the strictest regulations of any involved Complete Streets Policy applicable to a jurisdiction shall apply. LPAs that have not adopted their own policies are strongly encouraged to do so. The IMPO will foster partnerships with INDOT, LPAs, utility companies, neighboring counties, and other entities to develop facilities that further the IMPO’s Complete Streets Policy and continue such infrastructure beyond the IMPO’s urbanized area.
4.2 Network Connectivity

Applicable projects under this policy will be required to include at least:

- a continuous ADA-compliant sidewalk on one side of the roadway/bridge, or
- designated bicycle lanes within the roadway project, if the inclusion of a sidewalk is anticipated to be overly burdensome to the project and therefore infeasible, or
- a multi-use path of a sufficient width to accommodate both pedestrian and bicycle travel simultaneously.

Projects located along corridors already served by a continuous sidewalk or multi-use path on at least one side of the roadway are considered to be compliant. Improvements to ensure good condition and ADA compliance are encouraged. If designated bicycle lanes are included, the design for their width, markings, and treatment at intersections and crossings should follow the design guidance of the National Association of City Transportation Officials (NACTO) Urban Bikeway Design Guide, found online at [http://nacto.org](http://nacto.org).

If the planned facility currently has fixed route transit, or is proposed to have fixed route transit in the Long Range Transportation Plan or an approved Locally Preferred Alternative (route), then the project sponsor shall request comments from the local transit agency (IndyGo, Central Indiana Regional Transportation Authority (CIRTA), rural transit providers) during the project development process to ensure that collaboration occurs with these agencies and that accommodation of transit vehicles and opportunities to access transit facilities are provided.

4.3 All Projects and Phases

Every federally funded transportation improvement project phase should be approached as an opportunity to create safer, more accessible roadways for all users. Project phases include planning, programming, design, right-of-way acquisition, construction, construction engineering, reconstruction, and operations as well as any change to transportation facilities within street rights-of-way such as capital improvements, re-channelization projects, and major maintenance.

5.0 Design

The Indianapolis Metropolitan Planning Organization has long been a proponent of creating a multimodal, safe, and efficient transportation system that ensures accessibility to all roadway users. In order to increase the number of projects that provide multimodal facilities in central Indiana, the IMPO developed Multimodal Guidelines. These guidelines recognize the importance of, and encourage the concept of, complete street development.

5.1 Context Sensitivity

In recognition of context sensitivity, public input and the needs of many users, a flexible, innovative, and balanced approach that follows other appropriate design standards may be considered, provided that a comparable level of safety for all users is present.

5.2 Design Guideline References

IMPO LPAs shall follow accepted or adopted design standards and use the best and latest design standards available, while remaining flexible according to user needs and community context. Sources for design guidelines include:

• IndyGo design standards for transit-serving shelters and benches (2013) – http://www.indygo.net/pages/bus-stop-guidelines
• The National Complete Streets Coalition – www.CompleteStreets.org
• Costs for Pedestrian and Bicycle Infrastructure Improvements – http://pedbikeinfo.org/costpaper
• Federal Highway Administration (FHWA) – http://safety.fhwa.dot.gov/intersection/roundabouts/fhwasa10006/#s3
• Bike/Ped Level of Service Measures and Calculators + various other technical and educational information – http://www.bikelib.org/bike-planning/bicycle-level-of-service/

6.0 Implementation
This policy will require all projects funded with federal dollars awarded by the IMPO to support Complete Street principles. It is required that all projects in the Indianapolis Regional Transportation Improvement Plan (IRTIP) be consistent with this Complete Streets policy before federal funds are programmed and approved in the IMPO’s IRTIP via MiTIP (the IRTIP’s online application portal).

6.1 Implementation Process
The following steps will be utilized to assure this policy is uniformly implemented:

1. LPAs are encouraged to consider the Complete Streets Policy at the time of project conception, and to contact IMPO staff early on with any questions regarding what can be expected at the time of project application and, if the LPA anticipates an exception request, what will be expected.

2. At the time of project application, the LPA’s Employee of Responsible Charge (ERC) shall indicate via MiTIP either the project’s compliance with this Complete Streets Policy or request for an exception including supporting rationale.
3. During project selection, projects will be first sorted according to procedures in place prior to the effective date of this policy. Projects selected as priorities for funding will then be evaluated for compliance with this Complete Streets Policy. Exception requests will be reviewed either Administratively or Non-Administratively according to section 6.2 Exception Process of this policy. Projects found not in compliance with this policy, or for which an exception request is denied, will be found ineligible for funding during the applied for funding cycle.

The IRTIP tracking process will be utilized to ensure continued compliance to this Complete Streets policy throughout project implementation.

The IMPO recognizes that, during the course of project development, unforeseeable changes sometimes occur. However, LPAs are encouraged to review equitably all elements of a proposed project prior to eliminating components due to budget constraints.

After the IMPO has committed funding to a project, IMPO staff should be notified immediately of significant project scope changes. Projects should be updated in MitIP to ensure that the system includes accurate information. Mention of the project scope change should also be included in the quarterly tracking process. Depending on the significance of the change, an IRTIP amendment may be necessary. IMPO staff can advise on this matter.

Due to the flexibility of the policy and the variety of approaches that a sponsor may take to complete a street, IMPO staff, as stewards of the Complete Streets Policy, will work with the project sponsor throughout the final design process to find an acceptable solution for both parties.

6.2 Exception Process
If a project cannot meet the Complete Streets Policy, the project sponsor may request an exception. Exception requests will be initially reviewed and sorted by IMPO staff. Administrative Exceptions may be granted or referred to the Complete Streets Task Force by IMPO staff. IMPO staff reserves the right to abstain from the decision and pass the case on to the Complete Streets Task Force where there may be issues of ambiguity or real or potential public controversy. LPA applicants may appeal an Administrative decision to the Complete Streets Task Force. Non-Administrative or appealed Administrative Exception decisions will be made by the Complete Streets Task Force (6.3 Complete Streets Task Force).

Exceptions are divided into Administrative Exceptions and Non-Administrative Exceptions as listed below.

Administrative Exceptions. Exceptions may be considered for approval by IMPO staff when:

- An affected roadway prohibits, by law, specified users (such as an interstate freeways or pedestrian malls), in which case a greater effort shall be made to accommodate those specified users elsewhere, including on roadways that cross or otherwise intersect with the affected roadway (e.g. bridge decks reconstructed over the Interstate and underpasses under reconstructed/new interchanges).
- The activities are ordinary maintenance activities designed to keep assets in serviceable condition (e.g. spot repair, and surface treatments such as chip seal, resurfacing, or interim measures).
• Approved or adopted plans or policies (such as local or regional land use, zoning, connectivity planning), or present and anticipated market conditions indicate an absence of need, including future need, for multimodal facilities such as in instances of existing and anticipated continuance of sparse population.
• A project that would not otherwise need to acquire right-of-way (ROW) would require ROW acquisition in order to provide a sidewalk or multi-use path.
• The affected roadway has a functional classification of Interstate or Other Freeways and Expressways, as determined by the approved functional classification map in effect at the time the project is programmed.

Non-Administrative Exceptions. Exceptions may be considered for approval by the Complete Streets Task Force when:
• Improvements in compliance with this Complete Streets Policy would be in jeopardy of removal or destruction soon after their installation due to near-future planned projects in the same area.
• Applying Complete Streets principles to a project is inappropriate because it would be contrary to public safety or unduly cost prohibitive (e.g. if the addition of facilities for other modes would increase the cost so as to endanger the ability to secure local funds, would result in the significant expansion of a project schedule, or would create significant impacts to natural, topographical, cultural or historic resources that cannot be reasonably mitigated).
• A county or municipality’s Zoning or Subdivision Control ordinances requirements would suit the future installation of facilities as development occurs. To clarify, an exception may be considered if, according to locations regulations, developers of property zoned for future development along project corridors would be required to install the required sidewalk or multi-use path and coordinate with transit providers. This exception should not be applied piecemeal, creating gaps in service in anticipation of unscheduled future development; it would only apply if the majority of those served by the facility would come from future development on planned or zoned land.

6.3 Complete Streets Task Force

Non-Administrative or appealed Administrative Exception requests and submitted documentation supporting requests will be reviewed by the Complete Streets Task Force for approval. Such documentation shall be publicly available.

• The Complete Streets Task Force shall be made up of five (5) people who are appointed by the Indianapolis Regional Transportation Council (IRT MPO) Technical Committee, in accordance with the IMPO By-Laws, for one-year terms. Members may be reappointed for successive terms. The voting membership consists of four (4) technical representatives, two representing counties and two representing municipalities, and one (1) representative from a central Indiana transit provider. Two (2) additional technical representatives will be designated as alternates, to serve on the committee if a conflict of interest should occur. One (1) alternate will represent a municipality, one (1) alternate will represent a county. This Task Force shall be supported by one (1) IMPO staff member. Task Force members who are unable to attend a meeting may send their proxy, as listed on file with the IMPO (updated annually).

• The Complete Streets Task Force will meet on an “as needed” basis. IMPO staff will review the exception requests initially and provide a report with recommendations to the Task Force in advance of each meeting. The applicant will have the opportunity to review the report and add
comments to it prior to its submittal to the Task Force. Advance notice will be given in the Indianapolis Star and on the IMPO website 7 days before the date of the Complete Streets Task Force Meeting. The meeting shall be held in person, and shall be open to both the applicants and the public for review and comment. During each meeting, the Task Force shall discuss and evaluate the request(s), suggest revisions where appropriate, and vote on a recommendation.

- A quorum on the Complete Streets Task Force shall consist of at least three (3) voting members. Members with conflicts of interest on a particular project before the Task Force must recuse themselves from deliberation on that project, and the appropriate alternate will vote in their place.

- In the event that the sponsor disagrees with the action of the Complete Streets Task Force, the sponsor may appeal to the IMPO Policy Committee which may or may not elect to hear the appeal request.

- All exceptions will be kept on record and made publicly available.

The IMPO shall submit quarterly reports to the Indianapolis **Regional Transportation Council (IRTCMPO Policy Committee)** summarizing all exceptions granted in the preceding quarter.

### 6.4 Continuing Support

As a part of implementing this regional Complete Streets Policy, the IMPO encourages LPAs to
- notify and maintain regular communication with relevant departments, agencies, and committees within their jurisdictions when planning for transportation facilities;
- review current design standards, including subdivision regulations which apply to new roadway construction, to ensure that they reflect the best available design standards and guidelines, and effectively implement the regional Complete Streets Policy;
- form, or utilize an existing, local Technical Advisory Committee to discuss potential transportation projects and identify opportunities to include multimodal facilities;
- encourage staff to undergo professional development and training for non-motorized transportation issues by attending conferences, classes, seminars, and workshops;
- promote inter-departmental project coordination among city departments with an interest in the activities that occur within the public right-of-way in order to better use fiscal resources;
- include an educational component to ensure that all users of the transportation system understand and can safely utilize Complete Streets project elements; and
- consider the creation of a local Complete Streets policy to apply to all non-IMPO supported projects. Local policies established after the effective date of the IMPO Complete Streets Policy should strive to equal or exceed the requirements herein.
7.0 Evaluation / Performance Measures
IMPO shall, at a minimum, evaluate this policy and the documents associated with it every two years. This evaluation may include recommendations for amendments to the Complete Streets Policy.

The IMPO will report to the Indianapolis MPO Policy Committee (RPC) on the annual increase or decrease for each performance measure listed below, compared to the previous year(s), in order to evaluate the success of this Complete Streets policy.

- Total miles of bike lanes / trails built or painted
- Linear feet of new pedestrian accommodation
- Number of new curb ramps installed along city streets
- Crosswalk and intersection improvements, and other safety elements
- Percentage of transit stops accessible via sidewalks and curb ramps
- Rate of crashes, injuries, and fatalities by mode
- Number of approved and denied exceptions