Bypassing Good Judgment

INDOT and Its Over-expansion of the State Road 45/46 Bypass through Bloomington

Presented by
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Executive Summary

Twenty years ago the east side of Bloomington seemed to be undergoing significant development. INDOT assumed a very steep traffic growth rate and designed a widening of the State Road 45/46 Bypass to meet that growth with a rural, high-speed, highway-style design which was typical of that era. The design was never built.

Since then, the context has changed. Firstly, the expected increase in car traffic did not materialize. INDOT counts show that motor-vehicle traffic has either shrunk or remained stable.

Secondly, the city has become much larger and more urban. The 3rd Street corridor has become very urbanized with retail and residential, generating many pedestrian trips. 10th Street has become one of the most successful transit-oriented corridors in the state, with a tripling of transit trips and a 25% reduction in vehicle trips over the last 15 years; 7% of trips on this corridor are now being made by transit.

Thirdly, transportation policies have changed at both the federal and local levels, aimed at reducing vehicle trips while enhancing transit, bicycling, and walking environments for livability, sustainability, and other environmental and equity reasons.

In spite of the new context, INDOT has not changed the original, 20-year-old design beyond a few minor pedestrian enhancements. The design will increase speeds and add far more pavement than the traffic requires. The design adds two or three lanes to the pedestrian crossing distances at these key urban intersections, making most of the crosswalks more than 100 feet long.

Despite 20 years' passage, there are no indications that INDOT performed studies to consider aspects of the new context such as the number of pedestrian crossings. Nor have they reconsidered the traffic projections or reviewed the turning movements to determine where treatments like double left turns are truly needed. The design simply maximizes the space for cars given the space available.

By inducing driving while reducing walking, biking, and transit use, the design will reduce livability. A study indicates the only significant traffic delay occurs westbound, over a short period of time during evening rush hour that affects only about 1% of travelers. This problem could be solved with minor changes in the westbound infrastructure, along with signal timing improvements. Additional design modifications could enhance the pedestrian environment while still improving the movement of vehicles.

INDOT and the governor have committed to a list of projects that are to be finished "on time and on budget." Unfortunately, this project was on that list, whether or not its benefits to the community could be demonstrated. Redesigning the project -- or even accepting public input -- appear to conflict with this mandate. Although INDOT finally held a public meeting May 6, after almost a decade since the last one, it was considered an "open house" to inform the community what was happening, not a forum for public input.

Along with INDOT's lack of response to the community's and the mayor's concerns, the director of the Indiana division of the Federal Highway Administration has supported, in writing, all of INDOT's actions. We take particular issue with his agreement that the design speed of the project is actually 70 kilometers per hour.

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1. About the State Road 45/46 Bypass

The State Road 45/46 Bypass is a two-lane road, three miles long, between 3rd Street to the east and Walnut Street to the west, which widens to four lanes just before each of these intersections. The Bypass is limited in access, with only five streets crossing and three terminating at it. When the Bypass was built, it truly was a "bypass"; State Roads 45 and 46 were routed through downtown Bloomington, and the areas it passed through were rural and undeveloped.

Since construction of the Bypass, the city of Bloomington has grown significantly in both population and geography. The entirety of the road now falls within Bloomington's city limits (see Figure 1). The city's 3rd and 10th Street corridors are urbanized; the 10th Street corridor has become a very high-density residential area. The section of the Bypass between Fee Lane and 10th Street is nicely wooded. A nearly full canopy of trees and some limestone outcroppings buffer Indiana University housing and the IU Golf Course from the noise and view of the Bypass.

The term "Bypass" is no longer a technically accurate description for this road. It has become a Bloomington city street.

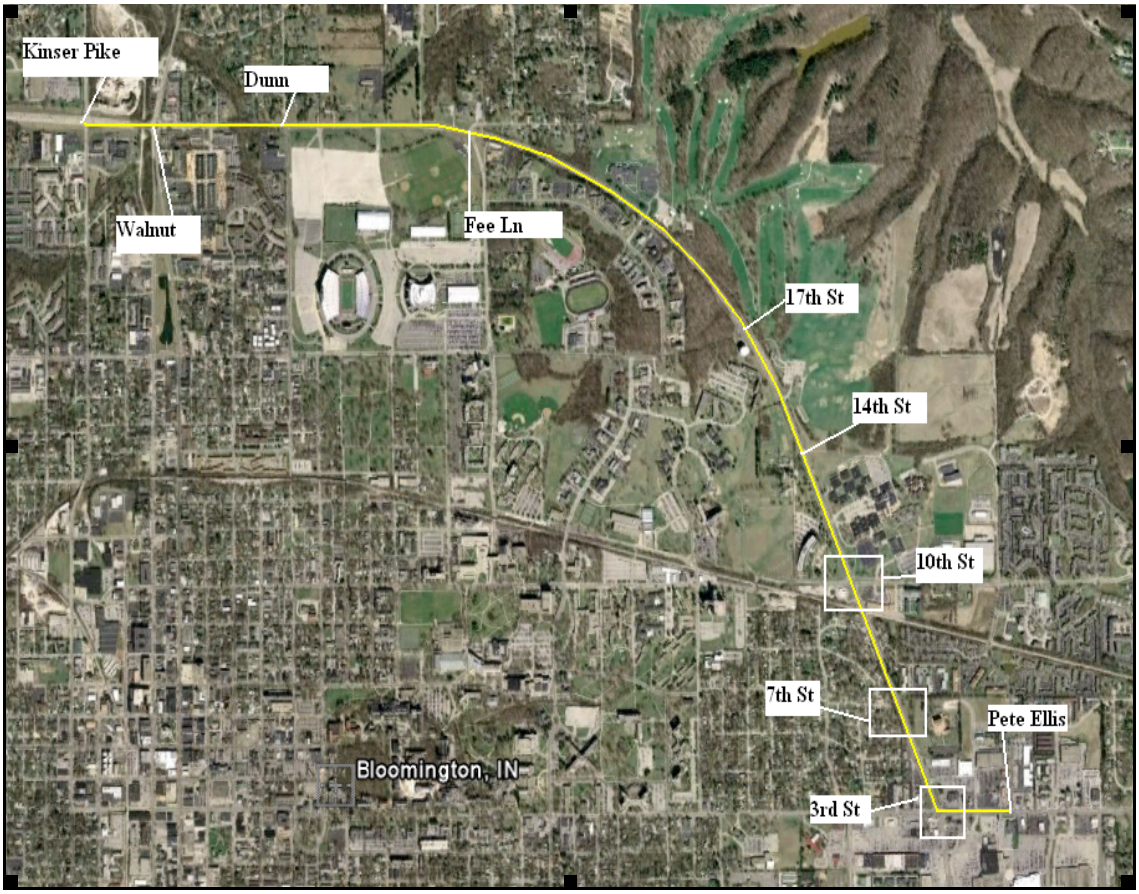

Figure 1. The Indiana State Road 45/46 Bypass

2. About INDOT's Proposed Design

The marquee in Figure 2 appears on the first page of the drawings of INDOT's design. Of particular importance are the predicted AADT (Average Annual Daily Traffic) in 2023 of 50,040 vehicles per day (VPD), and the Design Speed of 70 miles per hour.

TRAFFIC DATA		
A.A.D.T. (1997)	26200	V.P.D.
A.A.D.T. (2023)	50040	V.P.D.
D.H.V (2023)	4250	V.P.H.
DIRECTIONAL DISTRIBUTION	50 %	
TRUCKS	8.5	A.A.D.T.
	11	D.H.V.
DESIGN DATA		
DESIGN SPEED	70	M.P.H.
PROJECT DESIGN CRITERIA	RECONSTRUCTION (NON-FREEWAY)	
FUNCTIONAL CLASSIFICATION	PRINCIPAL ARTERIAL	
RURAL/URBAN	URBAN (INTERMEDIATE)	
TERRAIN	LEVEL	
ACCESS CONTROL	PARTIAL	

Figure 2. *The marquee on the blueprints for the Bypass expansion.*

The entire two-lane section is slated to become a divided four-lane road, with left-turning blisters at access points and multiple turn lanes at intersections. The design includes new connectivity to the east of the Bypass at 14th and 7th Streets. There will be double-left turns at virtually every leg of each existing intersection, often with right-turn lanes as well, thus adding two and sometimes three lanes to every leg of these intersections.

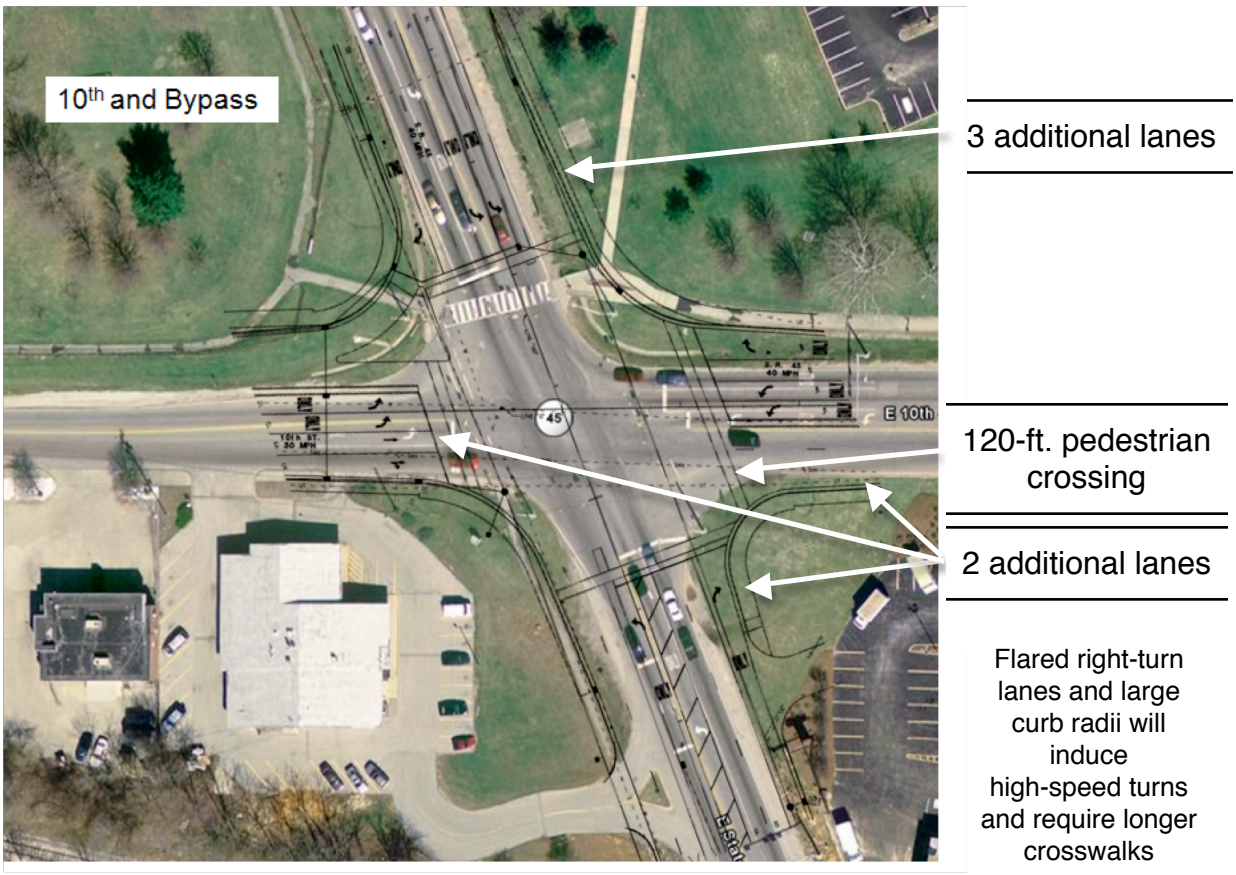

Figure 3. The Bypass at 10th Street. *The 10th Street corridor has seen a 25% drop in motor-vehicle traffic and a 300% growth in transit use over the past 15 years. 7% of trips on it are now by transit.*

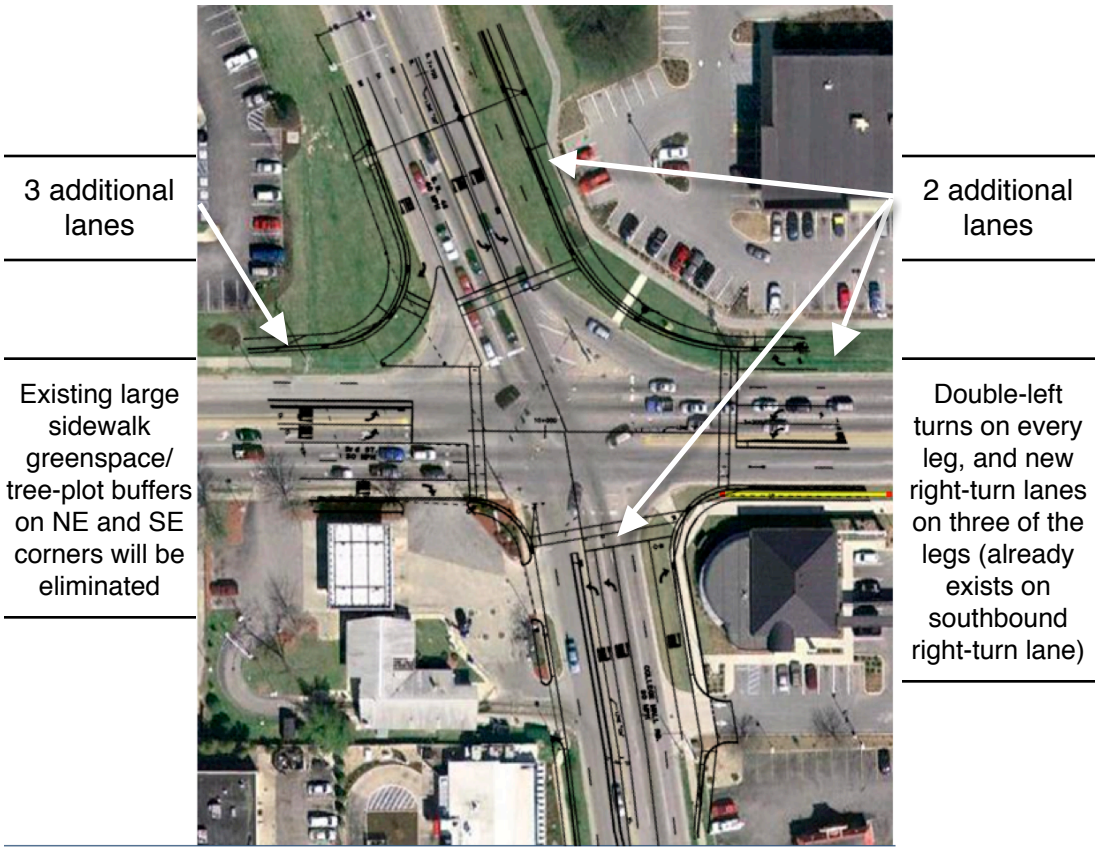

Figure 4. The Bypass at 3rd Street. *A study estimates more than 400 pedestrian crossings a day at this intersection.*

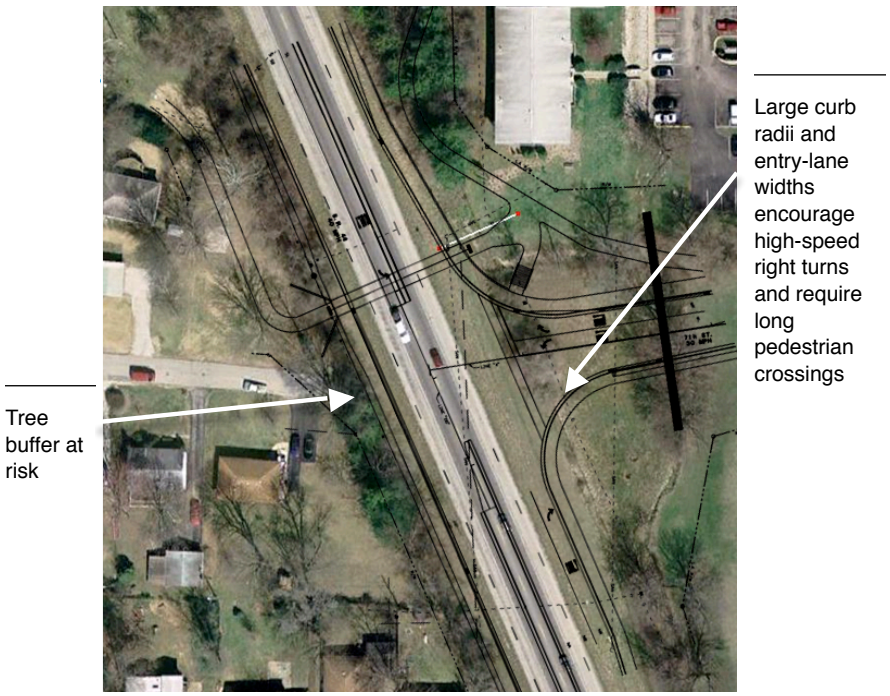

Figure 5. The Bypass at 7th Street. *The new design adds a significant amount of impervious pavement.*

Figure 6. View from the road. *Here is a tree-lined section between 17th and Fee Lane looking westbound; it is access-limited, and traffic moves quickly even at peak periods.*

3. Why the Design Is a Major Mistake

The intersections at 10th and 3rd Streets and the new intersection at 7th Street are of significant concern because these are urban corridors, with many bicyclists, walkers, and transit users. Also of great concern are the unnecessary added travel lanes throughout the project length, which will eliminate tree buffers and the tree canopy -- all this to handle traffic volumes the road will never carry.

3.1. Design is Rural; Context is Urban

3.1.1. INDOT Traffic Volume Predictions Were Woefully Inaccurate

The 1997 traffic was 26,200 VPD, and the 2023 projection is almost twice that, at 50,040 VPD — an expected annual growth rate of 3.5%. (See upper red line on the graph in Figure 7.)

However, this growth did not happen. Since then, the city has purposely directed growth to the west. According to INDOT's published traffic counts, the Bypass traffic actually declined at an average annual rate of -1.5% between 1995 and 2006.[1]

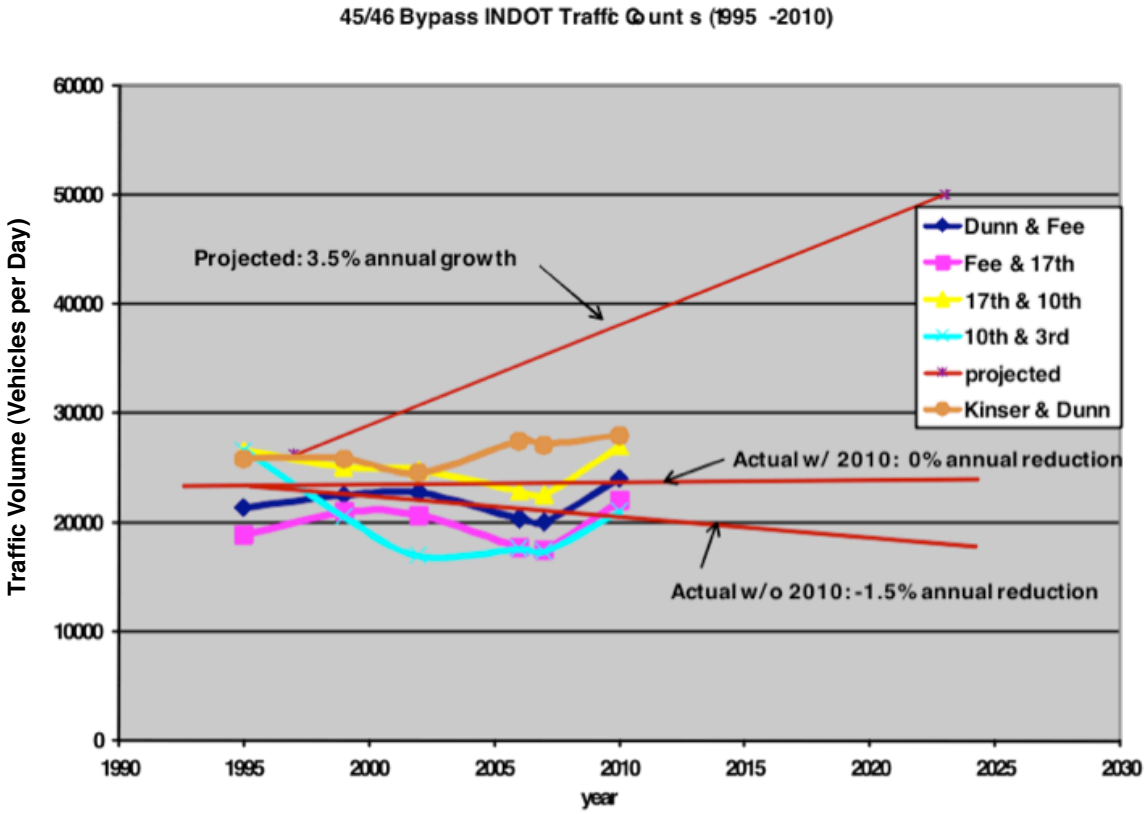

Figure 7: Expected vs. actual traffic on the Bypass. *INDOT predicted sharp growth that has not materialized.*

INDOT recently released new traffic counts that were near the 1995 levels. These are somewhat suspect: they are rounded to the nearest thousand (unlike previous counts), are different than previous trends, and were taken on the eve on the project letting. Incorporating these new counts would show, at most, no growth over the last 15 years.

The actual counts thus do not come close to INDOT's 1997 projections. Even State Road 37, the largest and busiest road in Bloomington, has never carried more than 40,000 VPD according to INDOT counts. On the basis of its long-ago estimating mistake alone, INDOT should reconsider the design of the Bypass.

3.1.2. Design Speed: 70 mph

Most disturbing is the Design Speed: the marquee in Figure 2 says 70 mph. It is obvious from the radii, lane widths, and road design that the finished road is meant to be a highway, when the context calls for an urban street. Designs of these dimensions would provide drivers with an environment that encourages high-speed travel.

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1 INDOT traffic count websites: [http://www.in.gov/indot/2339.htm], [http://dotmaps.indot.in.gov/apps/trafficcounts/Default.aspx]

Yet both INDOT Planning Director David Holtz, in a phone conversation, and Director of Federal Highway Administration - Indiana Division Robert Tally, in an email reply (see Appendix), claimed that the Design Speed was actually meant to read 70 *kilometers* per hour -- or 43.5 mph.

Our research indicates that design speeds must generally be 5-10 mph *over* posted speeds for safety reasons, but virtually never less than posted speeds. The drawings indicate an expected posted speed limit of 45 mph. We believe this to be an inaccurate guess by Mr. Holtz, who was given no notice prior to the phone call. We wonder what source Mr. Tally referenced for his conclusion.

We understand that designing a road for 70 mph satisfies a Design Speed of 43.5 mph (the Design Speed is a minimum). However, in an urban setting, a "target operating speed" is more appropriate -- the speed that a community would like vehicles to be traveling as a result of the designed street environment. Our community was for all practical purposes not consulted on this key figure.

3.1.3. [Actual] Travel Time Study

What are the actual economic benefits that come from this $24 million dollar investment? Users commonly claim a 30-minute travel time when congested, and officials recently mentioned at the May 6 public information meeting held by INDOT in Bloomington that time spent by cars in traffic was a dimension this design was attempting to mitigate.

On Tuesday, May 4, a travel-time study of the Bypass was done by a group of concerned citizens. Drivers measured the travel time between each intersection going the 3.2 miles from one end of the project to be constructed to the other -- from Pete Ellis Drive to Kinser Pike. Sixty-five passes in each direction were made over 12 ½ hours. The following graph shows the actual travel times compiled.

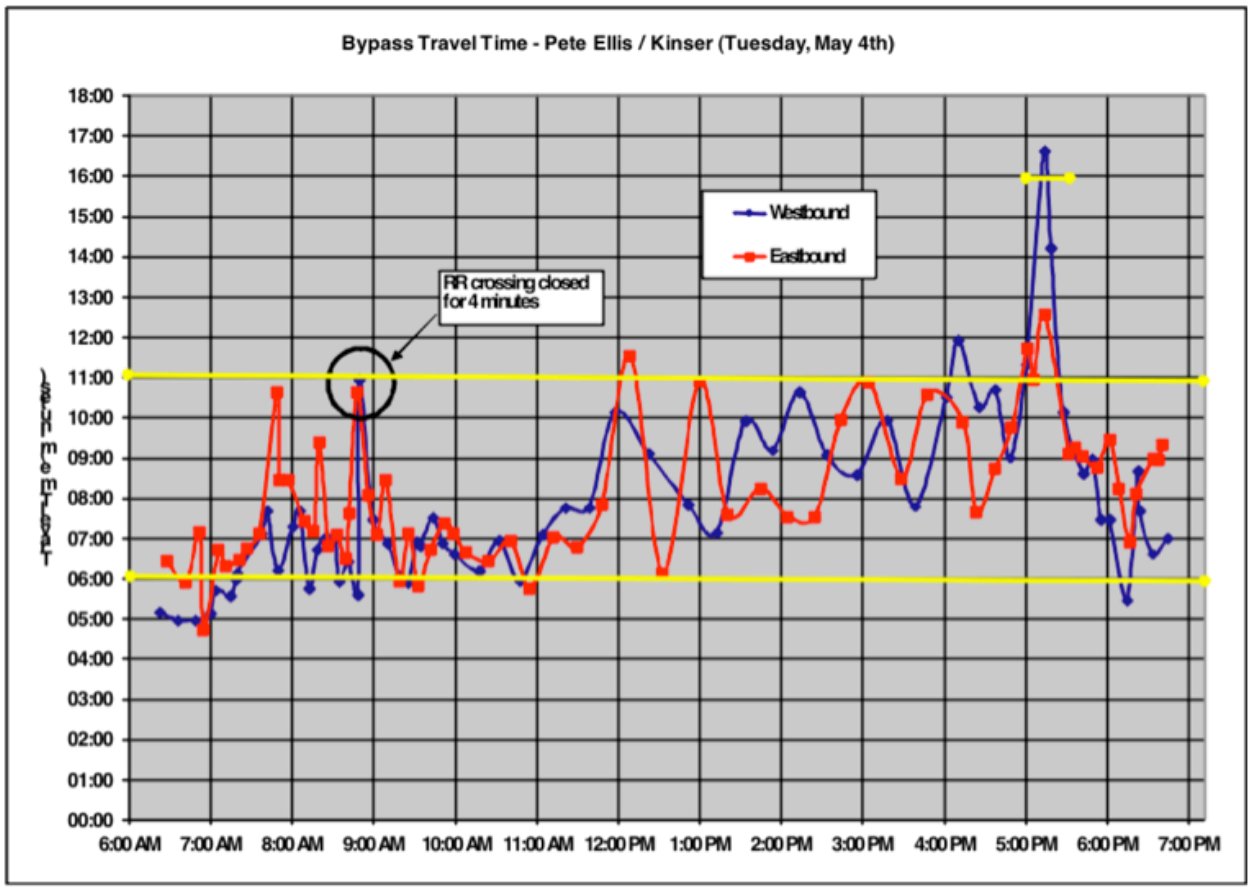

Figure 8. A study of travel time on the Bypass. *Most trips across the length of the Bypass take between 6 and 11 minutes.*

When motor-vehicle traffic was low, travel times were 5 to 7 minutes. When traffic was moderate, times were 8 to 11 minutes. The one peak (westbound) after 5:00 p.m. had a travel time of almost 17 minutes, but the congestion dissipated very soon thereafter. The peak only exceeded an 11-minute travel time for about 30 minutes. About 4% of the daily travelers were in this peak period, and less than 1% experienced the 17-minute travel time. This peak could be mitigated with nothing more than staggered shifts at IU's 10th & Bypass campus, although some infrastructure changes at the Walnut St. light could also be helpful.

It appears our impatience tends to taint our perception of time. From an economic perspective, there does not appear to be an analysis of marginal benefit compared to marginal cost. Follow the hyperlinks to see a study summary, and comments by two of the drivers (driver A and driver B) after completing the study. For a more thorough discussion of all the above information, go here.

3.2. Design Contradicts Municipal and Federal Policies

3.2.1. Federal Highway Policies

USDOT Secretary Ray LaHood has made livability one of the mainstays of FHWA policy. He has promulgated new Bike and Pedestrian Policies, putting them on equal footing with vehicles in urban areas. Many years prior to this, FHWA incorporated Context Sensitive Solutions (CSS) into their DOT policy requirements due to the damage that rural-style, high-capacity, high-speed roads have done to urban communities.

INDOT has not taken these policies up, and apparently has not been pushed to do so by the local division of FHWA. While the Institute of Transportation Engineers (ITE) has developed and adopted their own guidance, Designing Walkable Urban Thoroughfares: A Context Sensitive Approach: An ITE Recommended Practice, and other states create their own like New Jersey DOT and PennDOT, Smart Transportation Guidebook: Planning and Designing Highways and Streets that Support Sustainable and Livable Communities, INDOT remains silent and apparently unaware. This was apparent at the recent May 6 public information meeting. An experienced and highly-ranked official, Mr. Ed Cox, although impressively steeped with years of engineering "Greenbook" lore, was un-versed in Context Sensitive Solutions.

Again, the implementation of a 20-year-old design without public input and without considering the changed context is evidence of how unsuccessful the local FHWA office has been at implementing federal policy at INDOT.

3.2.2. Bloomington's Growth Policies Plan (GPP)

Bloomington first adopted a Growth Policies Plan (GPP) in 1991. The most recent GPP, adopted in 2002, reads:

"Bloomington must strive to reduce the number of vehicle trips traveled per resident. Reducing automobile trip-making not only reduces congestion but improves air quality, saves energy, and increases bicycle and pedestrian safety within the transportation system." (GPP, p. 14)

"Bloomington… has an opportunity to change the pattern of automobile trip-making over time by embracing alternative forms of transportation. Walking is a widely underestimated mode of alternative transportation. Walking trips generally out-number biking and transit trips by about ten to one. In an effort to mitigate traffic, support for walking should be paramount. Additionally, trip-making patterns can also be altered through increasing mixed land use development, pursuing a compact development strategy, and achieving more interconnected street systems." (GPP, p. 14)

"If walking is to compete with driving, the sidewalk environment must be very inviting." (GPP, p. 15)

3.2.3. Bloomington's Master Thoroughfare Plan (part of the GPP)

Mr. Tally's email mentions, "…this project is consistent with the Master Thoroughfare Plan of Bloomington which shows this corridor as a primary arterial."

Below is the drawing of the Primary Arterial in Bloomington's Master Thoroughfare Plan.[2] This could be described as a "boulevard." It has bike lanes, tree-plots with trees, and a grassy median with trees. It has 5 or 6 lanes maximum (right turn lane optional), and no double left-turns. These design features create a boulevard sensation and reduce driving speeds, yet handle significant traffic flow.

2 The Master Thoroughfare Plan can be found at the end of the Growth Policies Plan.

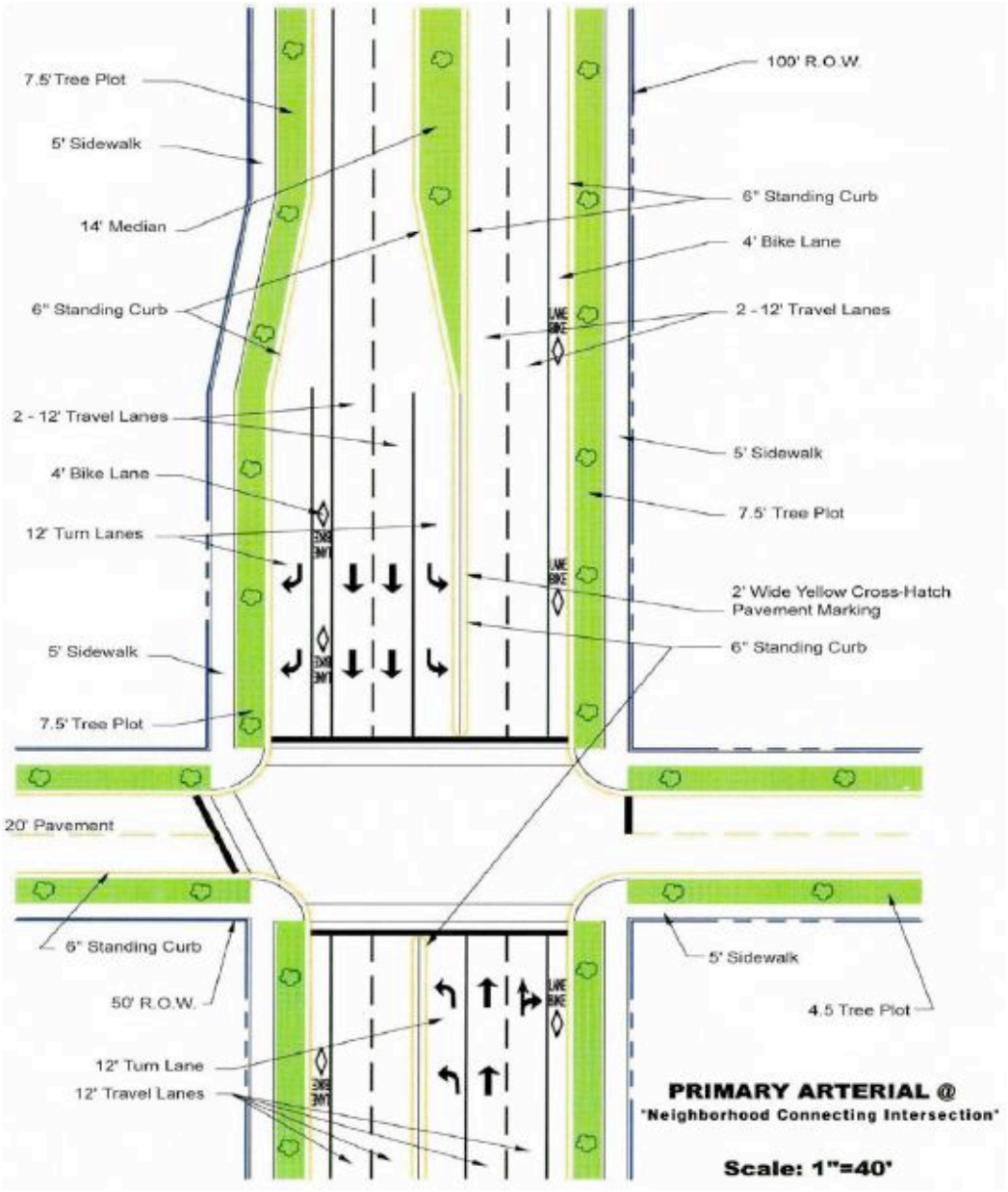

Figure 9. Bloomington's Master Thoroughfare Plan. *INDOT's design for the Bypass did not take Bloomington's policy into consideration at all.*

These features are not reflected in INDOT's design. The design is actually inconsistent with the city's Master Thoroughfare Plan, in contrast to Mr. Tally's statement.

3.2.4. Bloomington Commissions and Reports

Several official Bloomington commissions, including the Commission on Sustainability, the Environmental Commission, and the Peak Oil Task Force, have produced reports recently adopted by the City Council such as the Greenhouse Gas Inventory Report (see p. 16-17) and the Peak Oil Report (see p 112-150). Rather than focus on widening roads for more cars, their numerous recommendations all focus on providing high-quality alternatives to driving.

Indiana University also has an Office of Sustainability with a Campus Master Plan that requires Travel Demand Management (TDM) policies that reduce vehicle use (p. 168). INDOT seems not to be aware of any of these documents.

3.3. Design Contradicts INDOT's Claimed Goals of "Capacity and Safety"

Mr. Tally's email says, "capacity and safety issues are still the driving concern for this project. Even at the low level in 2005, INDOT has found that the need for the project continues."

Unfortunately, INDOT's definition of safety only pertains to the safety of car travelers. The College Mall Pedestrian Accessibility Study indicates there were 7 pedestrian injuries between 2003 and 2007 along the Bypass between the Pete Ellis and 10th Street intersections alone.

Pedestrian safety comes as a result of reducing vehicle traffic and speeds. It does not come by increasing car traffic, increasing traffic speeds, increasing crossing distances, and increasing conflict points (the number of lanes to cross).

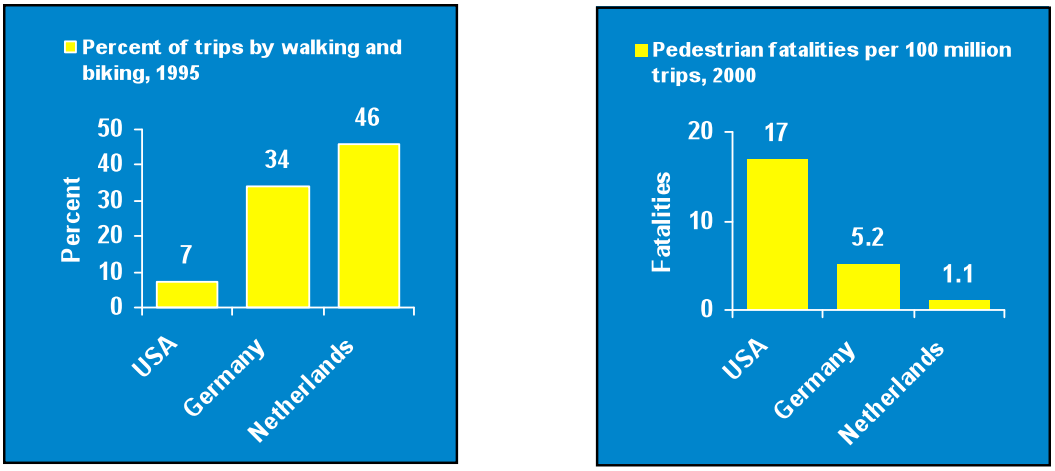

Figure 10. Pedestrian safety among Western societies. *There is a direct correlation between the adoption of non-motor-vehicle transport and pedestrian safety.*[3]

The above graphs show that the more trips that are made by walking, the safer walking is. These show that safety improves by an order of magnitude in places where improving the walking environment has been the policy focus. Also, Street Trees have been shown to reduce cars speeds and improve driver safety in urban areas, as well as improve intersection safety. Pedestrian safety studies have shown crossing a 4-lane road is more dangerous than a 2-lane road. We believe that the safety of pedestrians in particular has not been well assessed for this project.

3.4. Insufficient Environmental Assessment ("Categorical Exclusion")

Mr. Tally's email states, "The original environmental document for this project was a Categorical Exclusion (CE) with a Programmatic Section 4(f), which was approved on 1/18/96 and reaffirmed again on 10/16/2000 with additional information."

According to an IU official, there will be a loss of 500 trees adjacent to IU property. Blocks and blocks of homes, fraternities, sororities, and churches are also going to lose their tree buffers which will significantly affect noise and runoff. IU has designated a large area between the

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3 Promoting Safe Walking and Cycling to Improve Public Health: Lessons From The Netherlands and Germany,|John Pucher, PhD and Lewis Dijkstra, PhD [http://www.policy.rutgers.edu/faculty/pucher/AJPHfromJacobsen.pdf]

Bypass and Griffy Reservoir as a nature preserve -- another context change since the last study. These environmental aspects have not been fully studied and are important to our community.

3.5. New Context, Old Plan

There have been a number of major additions to the context through which the Bypass passes that should demand additional INDOT consideration:

- The northeast corner of 3rd and the Bypass has had massive development in the last 15 years. It used to have just a funeral home; now it has a CVS, Staples, Barnes & Noble, and Best Buy, to name a few. A pedestrian-crossing study done in 2007 showed more than 400 daily pedestrian crossings at this intersection. Also, the city just finished the College Mall Pedestrian Accessibility Study. This is a very detailed assessment of the area developed to improve the pedestrian environment and encourage pedestrian travel.
- The northeast corner of 10th and the Bypass has had significant development by IU, and significantly more is planned. Although this has brought additional car traffic, it has also brought a significant number of walkers, bicyclists and transit riders. It is important that this be very accessible by other modes, at the least, to minimize car travel to and from the main campus and maximize these preferred alternative modes, as held by all the policy documents mentioned above.
- Residential developments along 10th, improved transit service, and growth at 10th and the Bypass have combined to change old traffic patterns. Over the last 15 years, vehicle traffic has declined 25% and transit ridership has more than tripled on 10th St east of the Bypass. (see graph below)

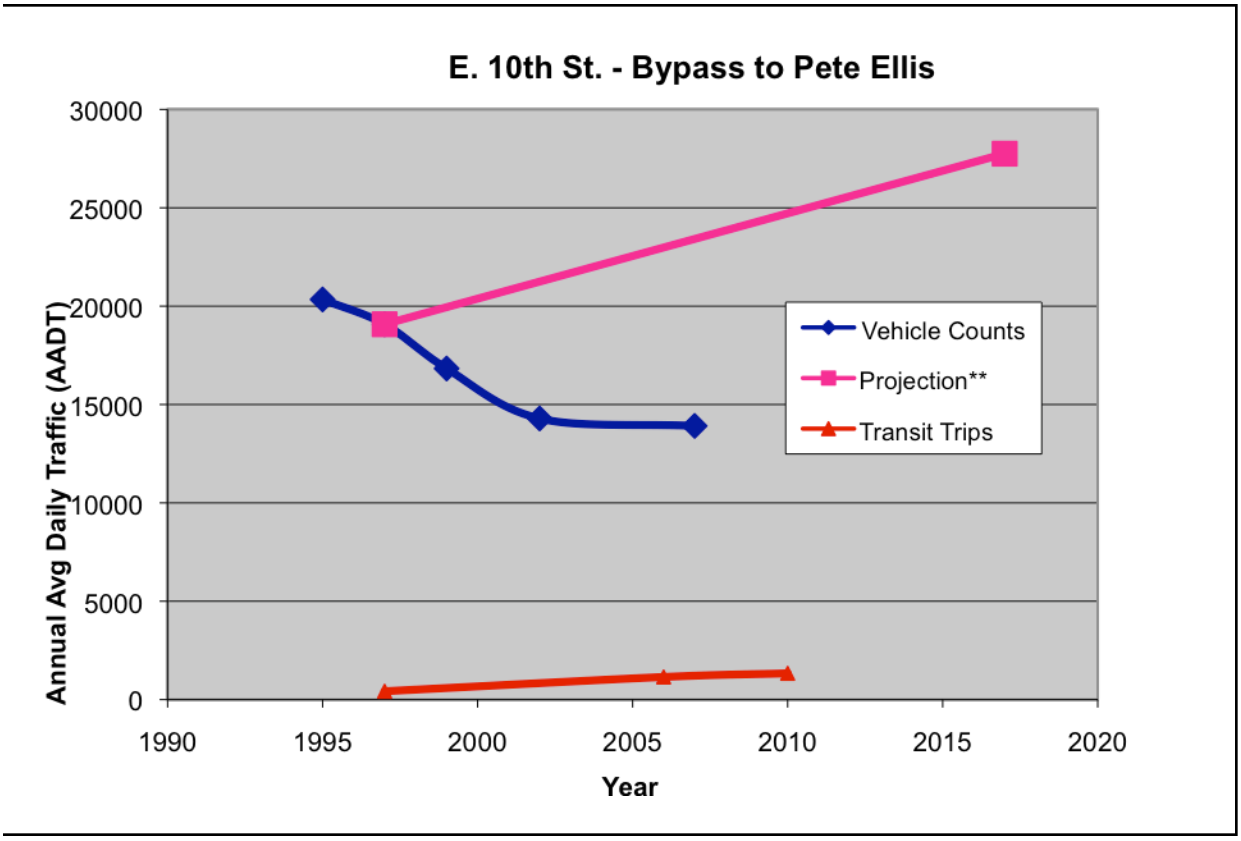

Figure 11. Traffic on E. 10th St (State Road 45). *On another project of interest to INDOT, they severely mispredicted the need for a larger state road.*

INDOT had a project to widen 10th Street to four lanes from Pete Ellis to the Bypass. The traffic projections for that project were equally inaccurate (the pink line). In 2007, when INDOT was ready to build it, letters from B-TOP, Bloomington Transit General Manager Lew May, and Bloomington Mayor Mark Kruzan encouraged a transit-oriented design. INDOT postponed this project and has not rescheduled it.

Mr. Tally's email indicates that modeling has been done for the double-left turns, but we suspect that was under the assumption that the 10th Street project would be completed.

4. Why THIS Design? It Was Shovel-Ready, on the List

In 2004, in order to sell the leasing of the Indiana Toll Road to the state legislature, a list of promised projects was developed by the Daniels administration called Major Moves, and the Bypass was on it.

The mandate from Governor Daniels is to build these projects "on time and on budget." INDOT's interest for this particular list is to avoid delay and break ground, regardless if the project is appropriate, desired by the community, or economically valuable. In this case, the interest was to get this off their docket as soon as possible before people realize the design is inappropriate.

A redesign would of course delay the project and increase costs. Yet a redesign reflecting the lack of need for such a large expansion could be a pilot project for INDOT -- a win-win situation in which the final product would be far less expensive to the state, more functional and more in line with community objectives.

5. Better Solutions That Are More Sensitive to Context

Context Sensitive Solutions (CSS) is an important FHWA program because of failures of transportation agencies to do two things: consider the community context they are going through, and engage members the public throughout the design process so that when it is done, they are proponents of it and it meets community objectives. The 45/46 Bypass failures are a perfect example of the need for CSS.

Mr. Tally's email says, "Context Sensitive Solutions is of importance to FHWA. It is also important to INDOT, which has developed its own policy for Context Sensitive Solutions."

There is no evidence that INDOT officials think CSS is important, nor are they even aware of it. Their May 6 meeting was not offered by INDOT, but fought for by Bloomington citizens for many months. It was the first public meeting about the project in almost 10 years; the last meeting at which INDOT took public input from Bloomington residents about the Bypass was held on September 6, 2000. INDOT did not intend to take public input at the 2010 meeting; they described it as an "informational meeting" or an "open house," at which they intended to

inform the public of what will happen.

To authors of this document who spoke with several INDOT officials, it was obvious that the officials had no training in Context Sensitive Solutions, or the FHWA guideline for Design Flexibility. They were unaware of the ITE CSS document, and design treatments that make a place walkable. They were unaware of the 400-plus pedestrians that cross daily at the 3rd Street intersection.

> *"[I] am always struck by what a monster the new Bypass will be. I think people will be surprised at how much it will change the character of the northern and eastern parts of town.*
>
> *...I have to confess to having the nagging feeling that this is going to be a lot more concrete that will play into the 'build it and they will come' scenario.*
>
> *...I can't help but think that we can't always build our way out of problems without creating a whole host of other issues."*
>
> ***—Mark Kruzan, Mayor, City of Bloomington***
> *Quoted in the Bloomington* Herald-Times*, 2005*

The Bloomington community has worked to inform INDOT of their desires over the years. For 10 years, a pedestrian overpass was planned north of 10th. That plan has since been removed because IU and INDOT did not support it. The Bike/Ped Safety Commission, an official city commission, sent INDOT a document with Bypass recommendations through the MPO staff. INDOT never replied. Mayor Kruzan has been critical of the design in newspaper articles (see mayor's quotes above), and in a recent reply to a BEDC letter.

5.1. Better Solutions

As noted in the time study, the only delay of any significance is westbound. The westbound peak travel time is not due to the lights at Dunn St. and Fee Lane as many have theorized; it is due to three other conditions we have observed:

- A very large volume of vehicles northbound on Walnut turning left to go westbound on the Bypass are causing long Walnut green times, and reducing the percent green on the Bypass.
- The queue for westbound traffic at Walnut is not sufficient to hold the stack at peak times.
- Large volumes of left-turning vehicles northbound on Dunn and turning westbound are filling the queue at Walnut, leaving no queue remaining for westbound traffic stopped at Dunn, causing the queue to back up past Fee Lane.

5.1.1. New Solution A – "Walnut to Dunn Only"

NOTE: Points 1 and 2 alone could solve the evening traffic spike.

1. **Expand the Bypass to a four-lane boulevard between Walnut and Dunn only**; do not four-lane any of the rest of the road for now. Use the boulevard style specified in the city's Master Thoroughfare Plan, with a tree-lined median and large tree-plots with trees between the sidewalks, and no right-turn blisters.
2. **Make the northbound left turn on Walnut a double-left turn** while shortening the maximum time for the left-turn cycle. The problem could be solved now just by shortening the left-turn cycle maximum.
3. **Leave 10th and 3rd as is**, except add pedestrian signalization and ladder-style crosswalks at 3rd, and improve/complete the existing pedestrian crossings at 10th. Do not otherwise add lanes.

4. **Reduce the radii and crossing distance at 7th.**
5. **Complete the pedestrian underpass** at 7th.
6. Request IU and other employers to **stagger employee departure times.**

Advantages:

- Additional lane between Walnut and Dunn increases the size of the queue for traffic eastbound to Dunn, eliminating the traffic backing up into the intersection at Walnut that creates the westbound traffic jam in the evening.
- Saves millions of dollars.
- Saves months or years of construction time and delay.
- Maintains the pleasant tree-lined corridor and protects the tree/noise buffers for neighbors.
- Improves the pedestrian environment.
- Protects future transit corridors from a degraded pedestrian environment.
- Allows time for the city and INDOT to contemplate CSS and TOD concepts for these corridors.

5.1.2. New Solution B – "Walnut to Fee Only"

1. All the recommendations in New Solution A, except **extend the four-lane boulevard to Fee Lane**; do not widen east of Fee for now.

Advantages:

- All the advantages of Solution A.
- Allows for an even larger queue.
- Facilitates improved arrival and departure for ball games.
- Does not destroy any tree-lined areas and will enhance this area which is currently without tree cover.

Both of these give INDOT and the city time to properly follow CSS principles and create a project that meets both INDOT's needs and Bloomington's stated objectives.

At the very least, currently-planned work should begin at the west end (Walnut), and NOT at the east end of the project, until further studies on reasonable traffic projections, actually turning movements, pedestrian crossings, and community values have been completed.

6. Conclusions

Based on an unrealistic expectation of private motor-vehicle demand, INDOT has proposed a sorely outdated highway expansion with a 70-mph design speed. They wish to force it through a highly urbanized area that has seen an increase in transit, biking, and walking, yet has seen car traffic that is decreasing or static at most. The expansion proposal has had no public input for 10 years, fails to come close to the predicted "need" claimed, and is the antithesis of the community's goals. In May, INDOT chose a contractor to implement this rural-style highway, which is insensitive to Bloomington's now-urban context.

INDOT's design is exactly what an engineer would implement if his/her only criteria was to maximize the movement of cars given the amount of space available. The design completely out of step with the city's wants and needs. Admittedly, 20 years ago this type of design for a road like the Bypass was the norm. But we have seen the fallout from years of this policy: FHWA,

EPA, many DOTs and cities across the country have realized that all an urban highway creates is more traffic and less livability.

Bloomington has a comprehensive plan that demands a reduction in VMT and an increase in walkability and transit options. It has shifted growth to its west side and halted growth in the area of this road, and can claim a large population of adults without cars. The City recently published a Report on Peak Oil that demands reduced oil use, has just completed a study to improve walkability on its east side, and has a mayor who has signed the Mayors' Agreement on Climate Change with a platform of livability and sustainability. The local Metropolitan Planning Organization (MPO) has an engaged citizen advisory component which initiated and implemented Indiana's first Complete Streets policy.

Bloomington and Indiana are suffering from a state DOT still functioning in yesterday's world; a complacent FHWA division out of touch with its headquarters; and an unfortunate program called Major Moves, a list of mandated projects hastily being built for the sake of building. We strongly recommend that the State Road 45/46 Bypass expansion be suspended and reevaluated.

# # #

Appendix

Email Reply from Robert Tally, Director, Indiana Division, Federal Highway Administration

From: <Robert.Tally@dot.gov>
Date: April 12, 2010 10:45:50 PM EDT
Cc: <Max.Azizi@dot.gov>, <Janice.Osadczuk@dot.gov>, <Jay.DuMontelle@dot.gov>
Subject: RE: URGENT concerns with INDOT

Ms. Ryterband,

Again, I want to thank you for your inquiry concerning the SR 45/SR 46 project in Bloomington, Indiana.

As I am sure you are aware, this project is included in the Bloomington MPO's current Transportation Improvement Program and the Indiana Department of Transportation's (INDOT) State Transportation Improvement Program. Likewise this project is consistent with the Master Thoroughfare Plan of Bloomington which shows this corridor as a primary arterial.

You should know that the Federal Highway Administration has already obligated federal funding for this project, and according to INDOT's 18 month construction letting schedule, the project will be let for construction on May for construction.

As you correctly indicate, Context Sensitive Solutions is of importance to FHWA. It is also important to INDOT, which has developed its own policy for Context Sensitive Solutions.

Regarding your specific comments, I want to offer the following information and response:

The original environmental document for this project was a Categorical Exclusion (CE) with a Programmatic Section 4(f), which was approved on 1/18/96 and reaffirmed again on 10/16/2000 with additional information. Categorical Exclusions have no expiration date, however, they are reviewed periodically during the development of the project to ensure that they accurately reflect the project impacts.

Indiana, and the Bloomington area, as did most of the nation, experienced a lowering of vehicle miles traveled (vmt) in the last few years (low in 2005), mainly due to higher fuel prices. However, capacity and safety issues are still the driving concern for this project. Even at the low level in 2005, INDOT has found that the need for the project continues.

You should note that the design speed for this project is 70 kph, not 70 mph. 70 kph is about 45 mph, which is not excessive for this corridor. Further, traffic modeling is standard practice and undertaken for intersection designs to ensure that they will effectively operate. These modeling studies were completed for this project as well.

Lastly, it is our understanding that a public meeting will be scheduled by INDOT for the near future for this project. I hope that this has provided clarification and answers to your questions. Please feel free to contact me if you have further questions.

Robert Tally
Division Administrator

FHWA Indiana Division

-----Original Message-----
From: Sarah Ryterband []
Sent: Friday, April 09, 2010 4:42 PM
To: Tally, Robert (FHWA)
Subject: URGENT concerns with INDOT

Dear Mr. Tally:

In the year since I last emailed you, I am increasingly encouraged by your boss, Secretary LaHood. His support of all users of the roadways, making us all equal stakeholders, warms my heart. Federal Highways policies of Context-Sensitive Solutions and Livability have clearly not been embraced here in Indiana and I am hoping that you can help me understand why that it. It is particularly apparent to me in light of this project, SR 45/46, for which I fear you will soon obligate funds.

Don't do it! I hope that you will also help me understand why there is a push for a roadway expansion which the numbers do not warrant, that is in opposition to the local Growth Policies Plan, and will create greater issues of safety.

I am disappointed not to have enjoyed FHWA's presence at the recent MPO-PC meeting in Bloomington. Council member Ruff shared some information re: SR 45/46 widening, which I believe needs to be addressed prior to the letting of this project. This is addressed in the attached document: the decrease in traffic counts over the last 15 years and a design speed which is excessive and will promote an unsafe environment for all users of this urban roadway.

Also at this prior MPO-PC, Mr. Martin attempted to receive elucidation of INDOT's project prioritization process, the criteria used in making those determinations. Despite repeated questions, he was stonewalled by the INDOT officials in attendance time and again. This is not in the spirit of cooperation, or of transparency for that matter.

While you told me a year ago that INDOT has met its obligation for a public hearing, albeit more than a decade ago, INDOT officials promised me a public meeting a year ago which still has not taken place. In the decade since the public hearing, much has changed along this corridor. There are supposedly new design changes, which are meant to address some considerations, but as of this week the designs in the City of Bloomington Engineering Department, which were present for review, were from June, 2009.

Is the EIS still valid for this project?

No analysis has been done of the bottlenecking that will occur on East 3rd and East 10th Street created by double turn lanes. To create an impossible situation which can only be addressed by more road widening would seem to be engineering folly. If my federal highway dollars are being spent on mitigating perceived congestion, doesn't intelligent, cost-effective design with an eye to the post-Peak Oil future, done with Livability and CSS in the foreground make more sense than throwing money at a project from another era?

I implore you to read my enclosed document, to consider your stated policies, and not just the rule of law, and do not obligate these funds until the issues are addressed in present time.