



Mr. Rickie Clark
Manager-Public Involvement
Indiana Department of Transportation
100 N. Senate Ave. IGCN 642
Indianapolis, IN 46204

Dear Mr. Clark:

As the Executive Director of the US 31 Coalition, I am submitting comments concerning the US31/SR10 J-turn projects. Please know that the US 31 Coalition strongly opposes the use of J-turns on the US 31 corridor.

I would like to begin by referencing the ongoing commitment by the State of Indiana to upgrade US 31 from Indianapolis to South Bend to a freeway. This commitment began with Governor O'Bannon, and has continued with each governor to the present. In addition, the project has been named a "finish what you start" project by the Blue Ribbon Panel (approved by Governor Pence) and named a top priority by Conexus. By building the planned J-turns, the Indiana Department of Transportation is breaking the commitment made by so many. Merely promising that "J-turns do not preclude eventual interchanges" does not rise to the level of the commitment.

In each public meeting that has been held, INDOT has discussed that J-turns are being planned because of the safety benefits that are provided. Certainly studies have shown a decrease in accidents at J-turn locations as compared to the previous intersections, but no attention has been paid to the types of accidents or the dispersal of accidents. Specifically, studies show that some types of accidents actually increase at J-turns, such as rear-end and fixed object crashes. In addition, North Carolina found that accidents at the u-turn locations of a J-turn actually increased by 67%. However, we know that interchanges and overpasses are a safer option. The National Academy of Sciences states, "the greatest safety, efficiency and capacity at rural expressway intersections are attained with grade separation." If safety is the overriding concern for the US 31/SR10 intersection, please more carefully consider an interchange for this location.

I would like to comment on the repeated claims that a J-turn is the quickest method of injecting safety into this location, with many mentioning that an interchange can take years and years. One only needs to look at the US 31/SR 28 interchange to know that an interchange, from inception to opening, can take just 3 ½ years (and can be even quicker when it is really urgent, such as the Honda interchange). In this same argument, we heard that an interchange can cost \$25M, compared to the \$1M for a J-turn. Certainly, an interchange CAN cost that much, or it

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can cost around \$10M, like the US 31/SR 28 interchange did. An interchange is attainable and achievable at this location, and should be the preferred alternative.

We understand that funding should always be considered carefully with road projects, as the taxpayer money is being used. However, it is not in the taxpayer interest to build something with the knowledge that it could be rebuilt in just a couple of years. It has been repeated several times that these J-turns are going on while the full US 31 corridor feasibility study is proceeding in a parallel process. This does not make good fiscal sense, particularly when the community is overwhelmingly asking that INDOT stop the J-turn planning and instead look at an interchange. INDOT will see an average increase of \$618M over the next seven years from the passage of HEA1002, and staff cannot consider an interchange at this location for an additional \$9M?

The US 31 Coalition engaged Policy Analytics to look at the economic and safety benefits of a US 31 freeway (one without J-turns), and they found that with a freeway we will see 1200 fewer accidents and 15 fewer fatalities a year. Instead of spot improvements that make little sense, this would be a wise investment with an eye to the future.

Please do not hesitate to let me know if you have any questions or concerns.

Sincerely,

Dennis E. Faulkenberg
Executive Director

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