Capitol Region Council of Governments (CRCOG)

Transportation Planning Certification Review of the Metropolitan Transportation Planning Process for the Hartford Transportation Management Area

Final Report
March 2014
## Contents

List of Acronyms ................................................................................................................................. 3
Preface .................................................................................................................................................. 4
Executive Summary .............................................................................................................................. 5
   Key Definitions of Federal Comments ........................................................................................... 5
   Summary of Commendations ........................................................................................................... 6
   Summary of Corrective Actions and Recommendations ............................................................... 6
Specific Items of Discussion at the On-site Review .............................................................................. 10
   Review of Findings from 2009 Federal Transportation Management Area Certification Review ...................................................................................................................... 10
   Programming Efforts (STP-Urban, Congestion Mitigation and Air Quality (CMAQ), Transportation Alternatives Program, Local Transportation Capital Program) .................................................................................................................. 14
   On-Site Review Public Meeting and Comments from Board and Committee Members ............ 16
   Public Involvement, Title VI, Environmental Justice and Limited English Proficiency ............ 16
   Unified Planning Work Program (UPWP)/ Recent and Planned Special Studies (Transit and Highway) .................................................................................................................................................. 18
   Transit, Active Transportation, and Livability Planning .............................................................. 19
   MPO Coordination: CRCOG, CCRPA, MRPA, PVPC ................................................................. 20
   Building Technical Capabilities ...................................................................................................... 21
Planning Requirements Covered by this Review ................................................................................. 22
   MPO Organization/Structure ........................................................................................................ 22
   Boundaries ................................................................................................................................... 23
   Agreements/Contracts .................................................................................................................... 24
   Transportation Planning Process .................................................................................................... 25
   Metropolitan Transportation Plan Development ............................................................................. 25
   Financial Planning .......................................................................................................................... 26
   Air Quality ...................................................................................................................................... 27
   Self-Certification ............................................................................................................................ 28
   Environmental Mitigation ............................................................................................................... 29
   List of Obligated Projects ................................................................................................................. 30
   Security in the Planning Process .................................................................................................... 30
   Integrating Freight in the Transportation Planning Process ....................................................... 31
   Documentation ............................................................................................................................... 32
Appendix I – On-Site Meeting Agenda ............................................................................................. 33
Appendix II – Attendance Sheet for On-site Meeting ........................................................................ 34
Appendix III – Support Letter .......................................................................................................... 35
<table>
<thead>
<tr>
<th>Acronym</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>SAFETEA-LU</td>
<td>Safe, Accountable, Flexible, Efficient Transportation Equity Act</td>
</tr>
<tr>
<td>MAP-21</td>
<td>Moving Ahead for Progress in the 21st Century Act</td>
</tr>
<tr>
<td>ISTEA</td>
<td>Intermodal Surface Transportation Efficiency Act of 1991</td>
</tr>
<tr>
<td>TEA-21</td>
<td>Transportation Equity Act for the 21st Century</td>
</tr>
<tr>
<td>USDOT</td>
<td>United States Department of Transportation</td>
</tr>
<tr>
<td>CAAA</td>
<td>Clean Air Act Amendments of 1990</td>
</tr>
<tr>
<td>EPA</td>
<td>Environmental Protection Agency</td>
</tr>
<tr>
<td>FHWA</td>
<td>Federal Highway Administration</td>
</tr>
<tr>
<td>FTA</td>
<td>Federal Transit Administration</td>
</tr>
<tr>
<td>TMA</td>
<td>Transportation Management Area</td>
</tr>
<tr>
<td>MPO</td>
<td>Metropolitan Planning Organization</td>
</tr>
<tr>
<td>CFR</td>
<td>Code of Federal Regulations</td>
</tr>
<tr>
<td>CTDOT</td>
<td>Connecticut Department of Transportation</td>
</tr>
<tr>
<td>GIS</td>
<td>Geographic Information System</td>
</tr>
<tr>
<td>TIP</td>
<td>Transportation Improvement Program</td>
</tr>
<tr>
<td>ITS</td>
<td>Intelligent Transportation System</td>
</tr>
<tr>
<td>STP</td>
<td>Surface Transportation Program</td>
</tr>
<tr>
<td>MTP</td>
<td>Metropolitan Transportation Plan, also: Long-Range Transportation Plan (LRTP) and Regional Trans. Plan (RTP)</td>
</tr>
<tr>
<td>CMP</td>
<td>Congestion Management Process</td>
</tr>
<tr>
<td>TIM</td>
<td>Traffic Incident Management</td>
</tr>
<tr>
<td>CMAQ</td>
<td>Congestion Mitigation and Air Quality</td>
</tr>
<tr>
<td>STIP</td>
<td>State Transportation Improvement Program</td>
</tr>
<tr>
<td>TCM</td>
<td>Transportation Control Measures</td>
</tr>
<tr>
<td>SIP</td>
<td>Strategic Implementation Plan</td>
</tr>
<tr>
<td>EJ</td>
<td>Environmental Justice</td>
</tr>
<tr>
<td>LEP</td>
<td>Limited English Proficiency</td>
</tr>
<tr>
<td>UPWP</td>
<td>Unified Planning Work Programs</td>
</tr>
<tr>
<td>MOU</td>
<td>Memorandum of Understanding</td>
</tr>
<tr>
<td>UZA</td>
<td>Urbanized Area</td>
</tr>
</tbody>
</table>
Preface

MAP-21, Moving Ahead for Progress in the 21st Century Act (P.L. 112-141) is in effect as the authorizing and regulatory legislation for federally funded transportation planning activities. However, for the majority of the time covered under in this review the Safe, Accountable, Flexible, Efficient Transportation Equity Act (SAFETEA-LU) of 2005 was the guiding legislation that set forth requirements for statewide and metropolitan transportation planning, following upon the predecessor Intermodal Surface Transportation Efficiency Act of 1991 (ISTEA) and Transportation Equity Act for the 21st Century (TEA-21). This review covers the period from July 2009 to July 2013. The United States Department of Transportation (US DOT) issued planning regulations on November 14, 2007 implementing SAFETEA-LU requirements governing the transportation planning process. These requirements are presented in 23 CFR Part 450 and 49 CFR Part 613, Statewide and Metropolitan Planning Final Rule. The Metropolitan Planning Regulations are closely tied with the Clean Air Act Amendments of 1990 (CAA) through the U.S. Environmental Protection Agency’s (EPA) Air Quality Conformity Regulations. The general requirements of periodic review by USDOT of statewide and metropolitan transportation planning processes are retained in MAP-21.

The metropolitan planning regulations require that the Federal Highway Administration (FHWA) and the Federal Transit Administration (FTA) jointly review and evaluate the transportation planning process conducted in each urbanized area or Transportation Management Area (TMA) with a population over 200,000 no less than every four years. This review includes meeting the requirements of the Metropolitan Planning Regulations and, in air quality non-attainment or maintenance areas, evaluation of the process to ensure conformity of plans and programs to the EPA Air Quality Conformity regulations. Upon completion of this review, the FHWA and FTA will jointly Certify, Certify with Corrective Action or Decertify the Metropolitan Planning Process.

This is the sixth certification review of the Metropolitan Transportation Planning Process for the Hartford Urbanized Area and the Connecticut Portion of the Springfield MA-CT Transportation Management Area, partially represented by the CRCOG. Previous reviews were:

- March 7, 8 and 9, 1995
- May 5 and 27, 1998
- July 11 and 12, 2001
- October 20 and 21, 2004
- July 14, 2009

The federal review team conducted a desk review of the major components of the transportation planning process and explored selected components of the planning process and major USDOT initiatives in depth during the on-site review. This report identifies recommendations for consideration by the Metropolitan Planning Organization (MPO) for improvement and also highlights some of the positive practices of the MPO that can serve as examples to other states and planning organizations.

Certification Action

The FTA and the FHWA have determined that the transportation planning process conducted by the CRCOG, representing the Hartford portion of the Hartford TMA and the Connecticut portion of the Springfield MA-CT Transportation Management Area, meets the requirements of the Metropolitan Planning Rule, 23 CFR Part 450 Subpart C and 49 CFR Part 613. The FHWA and the FTA are therefore jointly certifying the transportation planning process.

4
Executive Summary

As a result of this Certification review, the FHWA and the FTA find that the CRCOG and its staff, in cooperation with the Connecticut Department of Transportation (CTDOT), are conducting a transportation planning process that meets the Federal regulations in 23 CFR and produces valuable products and results using the planning tools currently available.

The CRCOG has developed a high degree of proficiency in travel forecasting, traffic analysis, and other technical areas of planning, integrating technical methods effectively with broad public participation to address the region’s transportation challenges. Of special note is the CRCOG’s critical role in providing travel forecasting services and other technical support for planning major regional transit infrastructure projects, as well as the use of technical tools such as GIS and computer-aided design and simulations to communicate concepts to the public. The Capitol Region’s metropolitan transportation plan successfully synthesizes considerations of mobility and transportation safety with needs related to economic growth, environmental protection, land development, and other quality of life factors, demonstrating clear consistency with the eight planning factors. The Transportation Improvement Program (TIP) reflects the strategic direction of the metropolitan transportation plan, which has as its objective improved performance of the transportation system across all modes.

The CRCOG’s planning process is hereby certified in accordance with 23 CFR Part 450 Subpart C [450.443(b)] and 49 CFR Part 613. Noted below are several recommendations, commendations and corrective actions relative to the Capitol Region’s planning process.

Key Definitions of Federal Comments

The following definition of terms comes directly from the USDOT TMA Certification Process Field Handbook (December 2011), and are applied to most required and optional topic areas of review.

**Corrective Action:** Items that fail to meet the requirements of the transportation statute and regulations, thus seriously impacting the outcome of the overall process. The expected change and timeline for accomplishing it are clearly defined.

**Recommendation:** Items that, while somewhat less substantial and not regulatory, are still significant enough that FHWA and FTA are hopeful that State, local officials and transit operator(s) will consider taking some action. Typically, recommendations involve the state of the practice or technical improvements instead of regulatory requirements. The suggestions are clearly defined.

**Corrective Actions and Recommendations** describe what needs to be done and are the primary vehicles by which FHWA and FTA convey the need for improvement and change. The primary difference between a Recommendation and a Corrective Action is that the former addresses technical improvements to processes and procedures that would be enhancements but are not specifically required by law, whereas the latter indicates a serious situation that does not meet one or more requirements of the transportation planning laws and regulations. The expected outcome of a Corrective Action is change that brings the metropolitan planning process into compliance with a law or regulation; failure to respond will likely result in a more restrictive Certification. The expected outcome of a Recommendation is also change. While the change suggested by a Recommendation would improve the process, there is no Federal mandate, and failure to respond will not necessarily result in a more restrictive Certification.

**Commendations and noteworthy practices:** Elements that demonstrate innovative, highly effective, well-thought-out procedures for implementing the planning requirements. Elements addressing items that have frequently posed problems nationwide could be cited as noteworthy practices. Also, FHWA and FTA may wish to offer Commendations for significant improvements and/or resolution of past findings.”
Summary of Commendations

Planning for Operations, Intelligent Transportation Systems, Safety Planning and Congestion Management Process

- Commendation: The CRCOG is especially commended for its leadership in improving traffic incident management (TIM) in the region. The CRCOG has championed TIM at both the statewide and regional level with a CRCOG staff member serving as the chairperson of the statewide incident management task force for several years until the task force was eliminated by the governor. CRCOG continues its active involvement with TIM by coordinating efforts in the region and with CTDOT to spearhead education and awareness with first responder agencies and representatives on the benefits of TIM through coalition meetings, workshops, training, and other outreach approaches.

- Commendation: The CRCOG is also commended for its efforts to advance local traffic signal operations and management in the region. The CRCOG has embraced several of the recommendations following the FHWA/CTDOT joint review on the Local Agency Traffic Signal System Operation and Maintenance Program. In particular, the CRCOG requested and has advanced in coordination with CTDOT a project to update the Region’s ITS Strategic Plan and Regional ITS Architecture. The CRCOG is commended for championing the planning for ITS in conformance with the requirements of 23 CFR 940.9. The CRCOG is also collaborating with local agencies to improve traffic signal operations and maintenance and to utilize systems engineering on ITS projects.

Programming Efforts (STP-Urban, Congestion Mitigation and Air Quality (CMAQ), Transportation Alternatives Program, Local Transportation Capital Program)

- Commendation: The CRCOG does an excellent job of fostering active transportation under the STP-U program, through the use of funding set-asides for bicycle and pedestrian projects as well as the inclusion of Sustainability as the most heavily-weighted selection criterion.

Public Involvement, Title VI, Environmental Justice and Limited English Proficiency

- Commendation: The CRCOG’s conscientious and consistent approach to process evaluation of all facets of public participation is commendable for its thoroughness and transparency.

Transit, Active Transportation, and Livability Planning

- Commendation: The region has demonstrated a strong and abiding commitment to a robust and high-quality multi-modal transportation system through their heavy investment of STP and CMAQ dollars into the CTfastrak rapid bus line, as well as significant planned transit investments called for in the MTP.

Security in the Planning Process

- Commendation: The CRCOG has established a strong working relationship with emergency managers in the region to align goals, share resources and implement improvements throughout the transportation network.

Summary of Corrective Actions and Recommendations

Planning for Operations, Intelligent Transportation Systems, Safety Planning and Congestion Management Process

- Recommendation: Under the CMP, a more integrated approach that covers the entire Hartford TMA must be implemented. Each MPO within the urbanized area must work on a more seamless and united effort that is beyond a compilation of individually developed reports and must reflect extensive coordination with the other MPOs in the Hartford Urbanized Area. While the work done by the CRCOG is exemplary within the region’s borders, the regulations cited in 23 CFR 450.320 (a) call for a TMA-wide process and product.

- Recommendation: Under Operations and Management, funding for the operations of the existing highway
system seems to be significantly underrepresented within the financial plan of the CRCOG’s 2011 transportation plan. Moving forward, an increased emphasis and consideration towards the development of policies, goals, objectives, performance measures, and needs for use in developing strategies and projects to improve the operation and management of existing highways and public transportation facilities is highly recommended within the entire TMA. Training and technical assistance should also be requested and pursued from FHWA to assist the CRCOG in planning for operations and management. An Integrating Planning for Operations into Metropolitan Transportation Plans and Programs workshop is available from FHWA and other training or technical assistance opportunities should be investigated.

Programming Efforts (STP-Urban, Congestion Mitigation and Air Quality (CMAQ), Transportation Alternatives Program, Local Transportation Capital Program)

- Recommendation: The CRCOG should update its project selection and prioritization criteria to reflect the role of the Long-Range Transportation Plan (RTP) in the establishment of transportation priorities. CRCOG should also add language to its next RTP describing how the goals and projects outlined in the plan will be programmed in the TIP for implementation.

Public Involvement, Title VI, Environmental Justice and Limited English Proficiency

- Recommendation: The CRCOG was advised there has been an upsurge Title VI complaints in various parts of the country. It is recommended that the CRCOG remain diligent in documenting their adherence to Title VI regulations.

MPO Coordination: CRCOG, CCRPA, MRPA, PVPC

- Recommendation: The CRCOG should work with its State and MPO partners to ensure that any MPO consolidation process fosters an effective multimodal transportation planning process, aligns land use planning, MPO, and Census urbanized area boundaries to the greatest extent practicable, and supports existing MPO practices such as population-weighted voting that help foster an equitable and participatory planning process.

Building Technical Capabilities

- Recommendation: The Federal review team recommends that the MPO explore the feasibility of creating an online “Visual TIP” on the CRCOG website which could provide location-based, graphic descriptions and photos of proposed projects in the TIP, in order to enhance their visualization activities and outreach efforts for the TIP, as referenced in the CFR.

MPO Organization/Structure

- Recommendation: The CRCOG must amend or reorganize its policy board structure to meet the MAP-21 requirement for transit representation on MPO boards. FTA published draft guidance for this requirement on September 30th, 2013; final guidance will be forthcoming.

Boundaries

- Recommendation: If MPO redesignation proceeds with the addition of more towns into the MPO, proper procedural steps may need to be taken to accept more towns into the MPO, and the MPO must approve the new boundaries, with consent of the Governor, followed by notification to the USDOT Secretary, per 23 CFR 450.310 and 312.
Agreements/Contracts

- Recommendation: CTDOT, CRCOG, CCRPA, and the other MPOs in Connecticut should update their MOUs to reflect the reality of the 5307 funding distribution process, including procedures for formally transferring funds from one UZA to another in the event that this becomes necessary to fulfill the program's goals. The parties to the MOU should also consider developing a procedure by which long-term funding distribution is taken into account in selecting projects, to help ensure that all regions and recipients receive an equitable share over time.

- Recommendation: Providers of public transportation in the Capitol Region should be included as cosigners of the updated MOU.

Metropolitan Transportation Plan Development

- Recommendation: The next update of the Regional Transportation Plan must consider requirements of MAP-21 and any MPO redesignation. Please see the Transportation Improvement Program (TIP) Development and Project Selection for more observations and findings related to RTP project implementation in the TIP.

Financial Planning

- Recommendation: The CRCOG should include a breakdown of projected revenues for operating and maintenance costs as part of its RTP. The format currently used to demonstrate fiscal constraint for the RTP's proposed capital investments would be acceptable for use in the operating and maintenance costs section as well.

- Recommendation: The CRCOG should include in the Financial Summary section of its TIP a detailed side-by-side comparison of projected costs and revenues available, with clear titles and labels such that fiscal constraint can be easily determined. CRCOG is encouraged to include illustrative projects for which revenues are not currently available.

Environmental Mitigation

- Recommendation: For the next update of the RTP, the MPO should include an environmental policy discussion, in lieu of a project discussion, in terms of implementation of mitigation activities to minimize environmental impacts of transportation improvements (for example, low-impact development or green strategies for infrastructure improvements). USDOT will provide more specific direction in environmental mitigation.

Integrating Freight into the Transportation Planning Process

- Corrective Action: The CRCOG shall develop a regionally based freight planning program, to be part of the Metropolitan Planning Organization’s Unified Planning Work Program for 2014-2015. This program must include strategies for outreach to shippers, carriers and other freight providers and organizations in the Hartford Urbanized Area and develop an inventory and mapping of the regional freight network of terminals which requires consultation with freight providers, among others, and distribution centers and locations of freight bottlenecks and deficient infrastructure by March 2015, with assistance from FHWA, where needed, in order to comply with the federal citations below.
Corrective Action Citations:

23 CFR 450.306 Scope of the metropolitan transportation planning process.

(a) The metropolitan transportation planning process shall be continuous, cooperative, and comprehensive, and provide for consideration and implementation of projects, strategies, and services that will address the following factors:

1. Support the economic vitality of the metropolitan area, especially by enabling global competitiveness, productivity, and efficiency;

4. Increase accessibility and mobility of people and freight;

6. Enhance the integration and connectivity of the transportation system, across and between modes, for people and freight;

23 CFR 450.316, Interested parties, participation, and consultation.

(a) The MPO shall develop and use a documented participation plan that defines a process for providing citizens, affected public agencies, representatives of public transportation employees, freight shippers, providers of freight transportation services, private providers of transportation, representatives of users of public transportation, representatives of users of pedestrian walkways and bicycle transportation facilities, representatives of the disabled, and other interested parties with reasonable opportunities to be involved in the metropolitan transportation planning process.
Specific Items of Discussion at the On-site Review

In meeting the requirements of the Metropolitan Planning Regulations set forth in 23 CFR Part 450 and 49 CFR Part 613, Statewide and Metropolitan Planning Final Rule, MPOs have the flexibility to focus their particular planning expertise on the needs that they define for their planning region through their planning process. The purpose of the on-site review meeting was to assess the technical capability of the MPO staff in meeting these planning needs, and their ability to involve the public who may be affected by transportation investments in the transportation decision making process. In addition, the review team used these sessions to help assess the multi-modal nature of the MPO planning activities as well as their ability to respond to various USDOT initiatives. The on-site review provides an opportunity for the MPO to spotlight their unique and innovative approaches to achieving the federal requirements. As this TMA comprises three Metropolitan Planning Organizations, interregional cooperation and activities were a major focus of the certification review effort. The extent to which the public is involved in the transportation planning process and the decision making process were overarching themes during this review.

Review of Findings from 2009 Federal Transportation Management Area Certification Review

At the desk review, the CRCOG provided the federal review team with an outline of the CRCOG’s responses and actions to the 2009 Certification recommendations. A brief summary of the CRCOG’s responses to the 2009 certification recommendations is included below.

- **RECOMMENDATION:** The CRCOG is encouraged to participate in a recent FHWA freight advisory group initiative in Connecticut and to pursue opportunities to work with providers, FHWA and other relevant Federal agencies, the State, and other MPOs to develop effective approaches to freight planning.
  - **RESPONSE:** Staff has participated in the Talking Freight Seminars each month, hosted by FHWA’s Office of Freight Management and Operations and its Office of Planning. The CRCOG is attempting to build capacity at the staff level in freight planning. Staff remains available to participate in any CT freight advisory group.

- **RECOMMENDATION:** The CRCOG and partner agencies in the metropolitan planning process should continue to seek opportunities to strengthen coordination and resource sharing in the Hartford Urbanized Area.
  - **RESPONSE:** The CRCOG responded with examples of interregional cooperation and partner planning with other organizations within the Hartford Urbanized Area.

- **RECOMMENDATION:** The CRCOG is encouraged in its efforts to identify applications of Intelligent Transportation System (ITS) technologies to improve the performance of area public transit systems.
  - **RESPONSE:** The CRCOG responded that in the 2009 certification review, the highways side of ITS had essentially been implemented, and that this recommendation reflects those ITS transit elements which had been planned, but not yet implemented. The CRCOG responded that Surface Transportation Program (STP)-urban funds had been approved for the update of the Region’s ITS Strategic Plan and ITS architecture, and the MPO has supported CTDOT’s recent projects to upgrade CTTransit’s fareboxes and radios. CRCOG also reported that they have participated in CTDOT’s planning for ITS features on CTfastrak.
Planning for Operations, Intelligent Transportation Systems, Safety Planning and Congestion Management Process

**Intelligent Transportation Systems - Regulatory Basis:**


From 23 CFR 940.5 (Policy): “ITS projects shall conform to the National ITS Architecture and standards in accordance with the requirements contained in this part. Conformance with the National ITS Architecture is interpreted to mean the use of the National ITS Architecture to develop a regional ITS architecture, and the subsequent adherence of all ITS projects to that regional ITS architecture. Development of the regional ITS architecture should be consistent with the transportation planning process for Statewide and Metropolitan Transportation Planning.”

Additionally, from 23 CFR 940.9 (Regional ITS Architecture): “(a) A regional ITS architecture shall be developed to guide the development of ITS projects and programs and be consistent with ITS strategies and projects contained in applicable transportation plans. The National ITS Architecture shall be used as a resource in the development of the regional ITS architecture. The regional ITS architecture shall be on a scale commensurate with the scope of ITS investment in the region. Provision should be made to include participation from the following agencies, as appropriate, in the development of the regional ITS architecture: Highway agencies; public safety agencies (e.g., police, fire, emergency/medical); transit operators; Federal lands agencies; State motor carrier agencies; and other operating agencies necessary to fully address regional ITS integration.

(f) The agencies and other stakeholders participating in the development of the regional ITS architecture shall develop and implement procedures and responsibilities for maintaining it, as needs evolve within the region.”

**Operations and Management - Regulatory Basis:**

Federal statute 23 U.S.C. 134 (h)(1)(G), requires the metropolitan planning process to include the consideration of projects and strategies that will promote efficient system management and operation;

Federal statute 23 U.S.C. 134(j)(2)(D), which provides the basis for 23 CFR 450.322(f)(3), specifies that: Operational and management strategies to improve the performance of existing transportation facilities to relieve vehicular congestion and maximize the safety and mobility of people and goods;

Additionally, 23 CFR 450.322(f)(10)(i) further requires that the financial plan for the [Metropolitan Transportation Plan] MTP – and per the 23 CFR 450.324(h), the financial plan for the TIP – must include: For purposes of transportation system operations and maintenance, the financial plan shall contain system-level estimates of costs and revenue sources that are reasonably expected to be available to adequately operate and maintain Federal-aid highways and public transportation

**Transportation Safety Planning - Regulatory Basis:**

49 U.S.C. 5303 requires MPOs to consider safety as one of eight planning factors. As stated in 23 CFR 450.306, the metropolitan transportation planning process provides for consideration and implementation of projects, strategies, and services that will increase the safety of the transportation system for motorized and non-motorized users.

**Management Systems - Regulatory Basis**

The State and the MPO must develop a systematic approach for managing congestion through a process that “provides for safe and effective integrated management and operation of the multimodal transportation system.
The Congestion Management Process (CMP) applies to TMA based on a cooperatively development and implemented metropolitan-wide strategy of new and existing transportation facilities eligible for funding under 23 U.S.C. and title 49 U.S.C. Chapter 53 through the use of travel demand reduction and operational management strategies.” (23 CFR 450.320 (a))

**Observations:**

The CRCOG explained their long-standing and continuous involvement with ITS and safety planning both regionally and statewide. They included an update of the deployment of their ITS strategic plan. The CRCOG requested CTDOT’s support to update the region’s ITS Strategic Plan and regional ITS Architecture. A Federal-aid project is underway to accomplish this strategy. The CTDOT expressed satisfaction with their working relationship with the CRCOG in the area of transportation safety planning and incident management over the years. There remains some cooperative activity among some of the other Hartford TMA MPOs in Traffic Incident Management (TIM) even though the formal involvement of the other MPOs is not as strong as earlier efforts, prior to the last certification review. It was reported that a negative impact from turnover of essential personnel at the local level has impeded progress somewhat; however, the CRCOG is working to institutionalize TIM through the conduct of a curriculum of training programs for local first responders. The CRCOG presented the CMP involvement at the MPO and the TMA, and explained procedures, products and coordination.

**Conclusion:**

The Federal review team noted the strong involvement, leadership, commitment, and collaboration of the CRCOG with State and local officials in advancing many elements of traffic operations and management, including the planning and delivery of ITS and safety strategies and projects. These efforts have increased between the last review and present day planning initiatives that reflect the goals of the long-range plan and adherence to the eight planning factors. This involvement was noted at the on-site review, as well as through the desk review of the required documents.

**Commendations:**

The CRCOG is especially commended for its leadership in improving traffic incident management (TIM) in the region. The CRCOG has championed TIM at both the statewide and regional level with a CRCOG staff member serving as the chairperson of the statewide incident management task force for several years until the task force was eliminated by the governor. CRCOG continues its active involvement with TIM by coordinating efforts in the region and with CTDOT to spearhead education and awareness with first responder agencies and representatives on the benefits of TIM through coalition meetings, workshops, training, and other outreach approaches.

The CRCOG is also commended for its efforts to advance local traffic signal operations and management in the region. The CRCOG has embraced several of the recommendations following the FHWA/CTDOT joint review on the Local Agency Traffic Signal System Operation and Maintenance Program. In particular, the CRCOG requested and has advanced in coordination with CTDOT a project to update the Region’s ITS Strategic Plan and Regional ITS Architecture. The CRCOG is commended for championing the planning for ITS in conformance with the requirements of 23 CFR 940.9. The CRCOG is also collaborating with local agencies to improve traffic signal operations and maintenance and to utilize systems engineering on ITS projects.

**Recommendations:**

Under the CMP, a more integrated approach that covers the entire Hartford TMA must be implemented. Each MPO within the urbanized area must work on a more seamless and united effort that is beyond a compilation of individually developed reports and must reflect extensive coordination with the other MPOs in the Hartford Urbanized Area. While the work done by the CRCOG is exemplary within the region’s borders, the regulations cited in 23 CFR 450.320 (a) call for a TMA-wide process and product.

Under Operations and Management, funding for the operations of the existing highway system seems to be significantly underrepresented within the financial plan of the CRCOG’s 2011 transportation plan. Moving forward,
an increased emphasis and consideration towards the development of policies, goals, objectives, performance measures, and needs for use in developing strategies and projects to improve the operation and management of existing highways and public transportation facilities is highly recommended within the entire TMA. Training and technical assistance should also be requested and pursued from FHWA to assist the CRCOG in planning for operations and management. An Integrating Planning for Operations into Metropolitan Transportation Plans and Programs workshop is available from FHWA and other training or technical assistance opportunities should be investigated.
Programming Efforts (STP-Urban, Congestion Mitigation and Air Quality (CMAQ), Transportation Alternatives Program, Local Transportation Capital Program)

**TIP Development/Approval/Amendments - Regulatory Basis:**

23 CFR 450.324 requires the MPO to develop a TIP in cooperation with the State and public transit operators. Specific requirements and conditions, as specified in the regulations, include, but are not limited to:

- An updated TIP covering a period of at least four years that is compatible with the State Transportation Improvement Program (STIP) development and approval process; [23 CFR 450.324 (a)]
- The TIP should identify all eligible TCM’s[transportation control measures] included in the SIP and give priority to eligible TCM’s and projects included for the first two years which have funds available and committed; [23 CFR 450.324 (i)]
- The TIP should include capital and non-capital surface transportation projects, bicycle and pedestrian facilities and other transportation enhancements; Federal Lands Highway projects and safety projects included in the State’s Strategic Highway Safety Plan. The TIP and STIP must include all regionally significant projects for which an FHWA or the FTA approval is required whether or not the projects are to be funded with Title 23 or Title 49 funds. In addition, all federal and non-federally funded, regionally significant projects must be included in the TIP and STIP and consistent with the Metropolitan Transportation Plan (MTP) for information purposes and air quality analysis in nonattainment and maintenance areas; [23 CFR 450.324 (c),(d)]

**Project Selection Procedures - Regulatory Basis:**

CFR 23 Section 450, Subpart C – Metropolitan Transportation Planning and Program spells out a comprehensive planning process for MPOs to follow. Generally, the development and selection of projects for funding shall be completed through a comprehensive planning process with local input. Projects should be identified in the Transportation Plan and listed in the Transportation Improvement Program, and be developed through various planning methods.

**Observations:**

The CRCOG's current TIP covers FYs 2012-15, was developed in coordination with Connecticut's Statewide Transportation Improvement Program (STIP), and was approved by both the MPO board and the governor. The region is currently in the process of developing an FY2014-17 TIP. The CRCOG also publishes an annual list of projects for which Federal funds have been obligated in the preceding year.

Financial analysis by CTDOT on the STIP indicates that the CRCOG TIP is fiscally constrained. However, the Financial Summary section of the TIP lacks a side-by-side comparison of projected costs and revenues. The document therefore does not clearly demonstrate fiscal constraint. See the Financial Planning section of this report for more observations and recommendations regarding fiscal constraint in the TIP.

Project selection and prioritization is carried out through a set of procedures and criteria that vary depending on funding program. The Surface Transportation Program - Urban (STP-U), for example, assigns up to 110 points across 10 criteria. By using a variety of non-traditional criteria (e.g. sustainability, environmental justice, etc.) and funding set-asides for bicycle and pedestrian projects, the CRCOG's STP-U project selection process fosters investment in a variety of transportation modes. The same is true under the Congestion Mitigation and Air Quality (CMAQ) program. The TIP project selection criteria also do not include an explicit reference to the Long Range Transportation Plan (LRTP, also known as the MTP), though they do account for regional significance.

**Conclusion:**

The CRCOG and CTDOT follow an appropriately cooperative process for selecting projects for Federal funding, meeting the requirements of CFR 450.330.
Commendation:

The CRCOG does an excellent job of fostering active transportation under the STP-U program, through the use of funding set-asides for bicycle and pedestrian projects as well as the inclusion of sustainability as the most heavily-weighted selection criterion.

Recommendation:

The CRCOG should update its project selection and prioritization criteria to reflect the role of the Long-Range Transportation Plan (RTP) in the establishment of transportation priorities. CRCOG should also add language to its next RTP describing how the goals and projects outlined in the plan will be programmed in the TIP for implementation.
On-Site Review Public Meeting and Comments from Board and Committee Members

**Observations:**

There was one member of the general public in attendance at the meeting, but declined comment. The scheduled Transportation Committee meeting was held, and several members were available, and there were comments about the transportation planning process employed by the CRCOG staff. The Town Planner of Marlborough commented about the difficulty experienced by smaller municipalities to realize Federal-aid projects (funded with STP-Urban) within the usual project selection process used by the CRCOG, which mirrors to a large extent that process which is employed by CTDOT. The CRCOG staff had responded to the difficulties experienced by smaller towns within the MPO with a set-aside of STP-Urban funds that are available to the more rural communities. The Transportation Committee Chair responded favorably about the working relationship between the Committee and the CRCOG staff.

**Conclusion:**

Comments from Transportation Committee members and other planning partners who attended the on-site meeting indicate that good working relationships have been built by the CRCOG to accomplish the goals of the region in transportation planning.

---

Public Involvement, Title VI, Environmental Justice and Limited English Proficiency

**Outreach/Public Participation - Regulatory Basis:**

The MPO is required, under 23 CFR 450.316, to engage in a metropolitan planning process that creates opportunities for public involvement, participation and consultation throughout the development of the MTP and the TIP and is also included in 23 CFR 450.322 (f) (7) and (g) (1) (2), (i) and 23 CFR 450.324 (b).

**Title VI Update - Regulatory Basis:**

It has been the long-standing policy of U.S. DOT to actively ensure nondiscrimination under Title VI of the Civil Rights Act of 1964. Title VI 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” Title VI bars intentional discrimination (i.e., disparate treatment) as well as disparate-impact discrimination stemming from neutral policy or practice that has the effect of a disparate impact on protected groups based on race, color, or national origin. The planning regulations [23 CFR 450.334(a)(3)] require the MPO to self-certify that “the planning process . . . is being carried out in accordance with all applicable requirements of . . . Title VI of the Civil Rights Act of 1964, as amended (42 U.S.C. 2000d-1) and 49 CFR part 21.”.

**Basic Requirement - Executive Orders Pertaining to Environmental Justice (EJ) and Limited English Proficiency (LEP):**

*Environmental Justice*  Executive Order (E.O.) 12898, issued February 11, 1994, provides that “each Federal agency shall make achieving Environmental Justice part of its mission by identifying and addressing, as appropriate, disproportionately high or adverse human health and environmental effects of its programs, policies, and activities on minority populations and low-income populations . . . .” In compliance with this Executive Order, the U.S. DOT Order on Environmental Justice was issued on April 15, 1997. Furthermore, FHWA issued order number 6640.23 on December 2, 1998, entitled “FHWA Actions to Address Environmental Justice in Minority Populations and Low-Income Populations,” to establish policies and procedures for the FHWA to use in complying with Executive Order 12898. FTA Circular 4703.1, Environmental Justice Policy Guidance for Federal Transit Administration Recipients was published on August 15, 2012.
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 that may face challenges accessing employment and other services, be sought out and considered.

Limited English Proficiency Executive Order 13166, issued August 11, 2000 directs federal agencies to evaluate services provided to Limited English Proficient (LEP) persons and implement a system that ensures that LEP persons are able to meaningfully access the services provided consistent with and without unduly burdening the fundamental mission of each federal agency. Additionally, each federal agency shall ensure that recipients of federal financial assistance provide meaningful access to their Limited English Proficiency applicants and beneficiaries.

Observations:

The CRCOG employs a public participation process that is evaluated at least annually to test its effectiveness. The CRCOG meets or exceeds the required public comment processes for every major federally mandated planning product. A high level of time, thought and effort is expended to provide mechanisms for the public access to information about the transportation planning activities at the MPO. A variety of strategies has been used to enhance public participation and to provide access to agency services and information.

Conclusion:

The CRCOG meets and frequently exceeds the federally required outreach endeavors in public participation and is demonstrating efforts to communicate with traditionally underserved populations of the Capitol Region.

Commendation:

The CRCOG’s conscientious and consistent approach to process evaluation of all facets of public participation is commendable for its thoroughness and transparency.

Recommendation:

The CRCOG was advised there has been an upsurge Title VI complaints in various parts of the country. It is recommended that the CRCOG remain diligent in documenting their adherence to Title VI regulations.
Unified Planning Work Program (UPWP)/ Recent and Planned Special Studies (Transit and Highway)

**UPWP Development - Regulatory Basis:**

MPOs are required to develop Unified Planning Work Programs (UPWPs) in Transportation Management Areas (TMA's) to govern work programs for the expenditure of FHWA and FTA planning and research funds (23 CFR 450.308). The UPWP must be developed in cooperation with the State and public transit agencies and include the required elements.

**Observations:**

In regards to UPWP development, the CRCOG has established goals and issues with member municipalities and other planning partners and has reflected those in the tasks of the UPWP. The CRCOG has periodically amended the two-year UPWP, as appropriate. The CRCOG develops timelines and budgets for individual tasks.

The CRCOG has developed, initiated and completed several studies during the certification review period. Regional staff reported that six corridor studies and five transit studies were initiated and completed since 2009, of which three Sustainable Knowledge Corridor studies are included (funded through HUD-EPA-DOT grant monies). The MPO completed a variety of corridor studies, both concentrated in single towns and multi-town scales. The transit studies also showed a variety of focus areas and carefully considered recommendations in both rail and bus modes.

Particularly noteworthy during this period was the completion of the I-84 Viaduct Study, which received several awards. This study had wide-ranging areas of emphasis that included the urban context of the highway facility and the projected impacts of several alternatives.

The CRCOG reviewed the corridor study structure that is the framework for all of their analyses and processes.

**Conclusion:**

In regards to UPWP development, the CRCOG has appropriately amended the UPWP for major revisions/additions with the proper approvals. The timelines and budgets for individual tasks are reasonable. The UPWP development reflects evidence of a consultative process as required under 23 CFR 450.308. The CRCOG has addressed the required elements for the development of the UPWP, and has developed a thoughtful work plan.
Transit, Active Transportation, and Livability Planning

Regulatory Basis

Metropolitan planning regulations (23 CFR 450.306) require that the scope of the transportation planning process include consideration of both “motorized and non-motorized users”. Furthermore, planning must “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”, as well as “Enhance the integration and connectivity of the transportation system, across and between modes, for people and freight.” In addition, MPOs and State DOTs must, when appropriate, consult with other agencies that have certain responsibilities for land and other resource management.

Observations

The Hartford region has demonstrated its commitment to high-quality transit service through the development of the CTfastrak rapid bus line. The region has chosen to invest in this project using a significant portion of its CMAQ and STP funds, which may be used for either highway or transit projects. Furthermore, the Metropolitan Transportation Plan (MTP) for the area calls for robust continued investment in transit going forward: on a per-dollar basis, 55% of the investments called for in the MTP are transit-related.

CRCOG also supports livability, sustainability, and active transportation through a wide variety of other planning activities, including:

- Bicycle and pedestrian planning;
- Participation in the "Sustainable Knowledge Corridor" with Massachusetts’s Pioneer Valley;
- A Transit-Oriented Development (TOD) Market Analysis as part of a HUD Community Challenge grant;
- A "Visualizing Walkable Communities" effort to educate elected officials about TOD;
- TOD On-Call technical assistance to communities along the CTfastrak corridor;
- Plans for commuter rail service connecting south to New Haven and north to Springfield, MA; and
- Plans for a series of regionally-coordinated local bikeshare systems to complement transit service.

Commendation: The region has demonstrated a strong and abiding commitment to a robust and high-quality multi-modal transportation system through their heavy investment of STP and CMAQ dollars into the CTfastrak rapid bus line, as well as significant planned transit investments called for in the MTP.
MPO Coordination: CRCOG, CCRPA, MRPA, PVPC

Consultation and Coordination - Regulatory Basis:

The requirements for consultation are set forth primarily in 23 CFR 450.316(b-e) which calls for consultation in developing the MTP and TIP. Consultation also is addressed specifically in connection with the MTP in 23 CFR 450.322(g)(1)(2) and (f)(7) related to environmental mitigation. (see also Transportation Planning Process topic area)

The MPO should engage in a consultation that includes (1) comparison of the MTP with State conservation plans or maps, if available, or (2) comparison of the MTP with inventories of natural or historic resources, if available.

Observations:

The CRCOG appears to have a strong working relationship with its primary partners in the planning process, as evidenced by discussion at the on-site review with CTDOT, Greater Hartford Transit District, and the neighboring Hartford TMA MPO, Central Connecticut Regional Planning Agency (CCRPA). CRCOG participates in annual coordination meetings, at which the region’s planning agencies exchange UPWPs, discuss upcoming projects, and consult on planning issues.

The State legislature recently initiated an effort to consolidate Connecticut’s regional planning organizations (RPOs); this is likely to significantly change the inter-agency landscape in coming years, especially because the RPO consolidation will be followed by a parallel consolidation of MPOs.

Recommendation:

The CRCOG should work with its State and MPO partners to ensure that any MPO consolidation process fosters an effective multimodal transportation planning process, aligns land use planning, MPO, and Census urbanized area boundaries to the greatest extent practicable, and supports existing MPO practices such as population-weighted voting that help foster an equitable and participatory planning process.
Building Technical Capabilities

Visualization Techniques - Basic Requirement:

The requirements for the use of visualization techniques in metropolitan plans and TIPs can be found as part of 23 CFR 450.316 - Interested parties, participation and consultation. The specific section is 23 CFR 450.316(a)(1)(iii), and the reference reads as follows: *The participation plan shall .... describe explicit procedures, strategies, and desired outcomes for: .... Employing visualization techniques to describe metropolitan transportation plans and TIPs.*

- Travel Forecasting (CTfastrak Service Planning, Use in Corridor Studies) and Model Update
- WebGIS and Data Initiatives

Observations:

The CRCOG employs a large variety of tools that demonstrate enhancements to visualization techniques and advanced analytic systems to help staff in a range of planning tasks. The CRCOG utilizes and maintains the only MPO-based travel demand system in the state. The CRCOG has a large staff of practitioners in GIS and other geo-analytical systems and regularly provides training opportunities for these staff members.

Conclusion:

The CRCOG is utilizing visualization techniques and advanced analytical tools, as well as providing appropriate technical training for staff, but could expand the visualization potential for the TIP that is contemplated in the CFR.

Recommendation:

The Federal review team recommends that the MPO explore the feasibility of creating an online “Visual TIP” on the CRCOG website which could provide location-based, graphic descriptions and photos of proposed projects in the TIP, in order to enhance their visualization activities and outreach efforts for the TIP, as referenced in the CFR.
Planning Requirements Covered by this Review

MPO Organization/Structure

Regulatory Basis

Federal legislation (23 U.S.C. 134(d)) requires the designation of an MPO for each urbanized area with a population of more than 50,000 individuals. When an MPO representing all or part of a TMA is initially designated or redesignated according to 23 CFR 450.310(d), the policy board of the MPO shall consist of (a) local elected officials, (b) officials of public agencies that administer or operate major modes of transportation within the metropolitan area, and including representation by providers of public transportation. (c) appropriate State transportation officials. The voting membership of an MPO that was designated or redesignated prior, will remain valid until a new MPO is redesignated. Redesignation is required whenever the existing MPO seeks to substantially change the proportion of voting members representing individual jurisdictions or the State or the decision-making authority or procedures established under MPO bylaws. The addition of jurisdictional or political bodies into the MPO or of members to the policy board generally does not require a redesignation of the MPO.

Observations:

The CRCOG’s policy board is structured as a council of governments (COG), with each member town having at least one voting representative, and some larger towns (such as Hartford) having multiple votes. The CRCOG has several other committees, including a transportation committee, but the policy board itself does not include voting representatives from local providers of public transportation, CTDOT, or other transportation agencies.

The CRCOG substantially meets federal statutory requirements the area of agreements and contract under SAFETEA-LU, the legislation that was in effect for study period of this review. However, additional actions must be taken for the CRCOG going forward in order to meet the requirements of MAP-21, the active transportation law.

Recommendation:

The CRCOG must amend or reorganize its policy board structure to meet the MAP-21 requirement for transit representation on MPO boards. FTA published draft guidance for this requirement on September 30th, 2013; final guidance will be forthcoming.
Boundaries

Regulatory Basis:

The metropolitan planning area boundary (MPA) refers to the geographic area in which the metropolitan transportation planning process must be carried out. The MPA shall, at a minimum, cover the Census-defined, urbanized area (UZA’s) and the contiguous geographic area(s) likely to become urbanized within the 20-year forecast period covered by the Metropolitan Transportation Plan. Adjustments to the UZA as a result of the transportation planning process are typically referred to by FHWA as the urbanized area boundary (UAB). In accordance with 23 U.S.C. 134 (e), the boundary should foster an effective planning process that ensures connectivity between modes and promotes overall efficiency. The boundary should include Environmental Protection Agency (EPA)-defined nonattainment and/or maintenance areas, if applicable, in accordance with the National Ambient Air Quality Standard (NAAQS) for ozone or carbon monoxide.

Observations:

The Hartford Urbanized Area as identified by the 2010 Census includes significant parts of the TMA for which three MPOs have transportation planning responsibilities: CRCOG, CCRPA, and the former Midstate RPA (now part of the Lower Connecticut River Valley Council of Governments). An extremely small piece of the Urbanized Area also extends into a fourth MPO: COGCNV. Part of the Springfield Urbanized Area extends into the Capitol Region. The urban boundaries encompass all of the Urbanized Area plus a significant area outside the Census-defined Urbanized Area. These more general urban area boundaries are used to help define the functional classification of roadways in the region. Both the urban boundaries and the functional classification were submitted to FHWA. Since the last certification review (2009-2010), the Town of Stafford elected to join the CRCOG in 2010, having been unaffiliated with any other region previously. Efforts are underway statewide to consider redesignation of MPO boundaries.

Conclusion:

The boundaries of the Capitol Region Council of Governments MPO are a contiguous geographic area with a finite boundary.

Recommendation:

If MPO redesignation proceeds with the addition of more towns into the MPO, proper procedural steps may need to be taken to accept more towns into the MPO, and the MPO must approve the new boundaries, with consent of the Governor, followed by notification to the USDOT Secretary, per 23 CFR 450.310 and 312.
Agreements/Contracts

Regulatory Basis:

In accordance with 23 U.S.C. 134, MPOs are required to establish relationships with the State and public transportation agencies under the cover of specified agreements between the parties to work in cooperation in carrying out a continuing, cooperative and comprehensive (3 C’s) metropolitan planning process. The agreements must identify the mutual roles and responsibilities and procedures governing their cooperative efforts. These agreements must identify the designated agency for air quality planning under the Clean Air Act and address the responsibilities and situations arising from there being more than one MPO in a metropolitan area.

If more than one MPO has been designated to serve an urbanized area, there shall be a written agreement among the MPOs, the State(s), and the public transportation operator(s) describing how the metropolitan transportation planning processes will be coordinated to assure the development of consistent metropolitan transportation plans and TIPs across the MPA boundaries...“23 CFR 450.314(d)

The Memorandum of Understanding (MOU) among the Hartford-area MPOs dates from 2003, but the CRCOG and its partner MPOs are currently working on an update, which they expect to complete in 2015, once the MPO consolidation process is complete. The existing MOU describes a process by which FTA's 5307 transit formula funds are pooled at the State level and distributed on a needs basis to the regions, rather than per the formula apportionments published by FTA.

This innovative needs-based distribution policy effectively addresses the issue of the "lumpy" costs of running a transit agency (that is, a transit agency may have very high costs one year due to a large bus replacement, while in subsequent years its needs might be much lower). However, there appears to be a misalignment between the process described in the current MOU and the process that has historically been carried out in compliance with FTA regulations.

In Connecticut, a large proportion of transit expenses are statewide in scope (CTTransit, passenger rail), giving the State a high degree of flexibility in how it distributes funds across UZAs. To actually transfer FTA 5307 funds from one UZA to another, however, would require that the designated recipients and the governor follow the procedure outlined in FTA Circular 9030.1E (Section III.5: Transfer of Apportionments).

The current MOU is signed by the CRCOG, CCRPA, MRPA, and COGCNV (the four MPOs that overlap with the Hartford UZA), as well as the CTDOT Bureau of Planning. The CTDOT Bureau of Public Transportation is not a signer of the 2003 MOU, nor are any of the direct providers of public transportation in the region.

Conclusion:

The Capitol Region Council of Governments MPO meets the requirements for organization and designation of 23CFR 450.310.

Recommendations:

CTDOT, CRCOG, CCRPA, and the other MPOs in Connecticut should update their MOUs to reflect the reality of the 5307 funding distribution process, including procedures for formally transferring funds from one UZA to another in the event that this becomes necessary to fulfill the program's goals. The parties to the MOU should also consider developing a procedure by which long-term funding distribution is taken into account in selecting projects, to help ensure that all regions and recipients receive an equitable share over time.

Providers of public transportation in the Capitol Region should be included as cosigners of the updated MOU.
Transportation Planning Process

Regulatory Basis:

The scope of the transportation planning process according to 23 CFR 450.306 and 450.318 defines the relationship of corridor and other subarea planning studies to the metropolitan planning process and National Environmental Policy Act (NEPA) requirements. The transportation planning process must also ensure participation by Federal lands management agencies and tribal governments in the development of products and programs in the planning process as per 23 CFR 450.316 (c) (d) and (e).

Observations:

The CRCOG's multimodal transportation planning process is continuing, cooperative, and comprehensive, and it considers the eight federal planning factors (economic vitality, safety, security, accessibility & mobility, environment & energy, intermodal integration, management & operations, and preservation). There is some lack of clarity, however, about how projects flow from the LRTP to the TIP and on to implementation. Please see the Transportation Improvement Program (TIP) Development and Project Selection and Metropolitan Transportation Plan Development sections of this document for more observations and findings about planning process integration between the LRTP and TIP.

Metropolitan Transportation Plan Development

Regulatory Basis:

In accordance with 23 CFR450.322 (a) “The metropolitan transportation planning process shall include the development of a transportation plan addressing no less than a 20-year planning horizon...the transportation plan shall include both long-range and short-range strategies/actions that lead to the development of a multi-modal transportation system to facilitate the safe and efficient movement of people and goods in addressing current and future transportation demand.”

Observations:

The CRCOG’s most recent metropolitan long-range transportation plan, the Capital Region Transportation Plan (RTP), was adopted in 2011 and covers the 30-year period up to 2040. It contains a comparison of projected costs and revenues over the study period, demonstrating fiscal constraint. It also includes illustrative projects for which revenue has not yet been secured. The RTP has a strong multimodal component, with public transportation projects representing about 55% of the capital investment over the plan period. The RTP does not, however, describe explicitly how these and other projects and policy goals outlined in the plan will find their way into the Transportation Improvement Program (TIP) for programming and subsequent implementation.

Conclusion:

The CRCOG Regional Transportation Plan meets the requirements of 23 CFR, Section 450.322 and is the result of considerable local involvement and a robust planning process. The CRCOG continues to innovate and seek opportunities for enhancing the metropolitan transportation plan as a comprehensive synthesis of rigorous technical analysis and community policy priorities. The CRCOG’s commitment to project implementation increases the importance of the plan in guiding investment decisions.
**Recommendation:**

The next update of the Regional Transportation Plan must consider requirements of MAP-21 and any MPO redesignation. Please see the Transportation Improvement Program (TIP) Development and Project Selection for more observations and findings related to RTP project implementation in the TIP.

**Financial Planning**

**Regulatory Basis:**

The metropolitan planning statutes state that the long-range transportation plan and TIP (23 U.S.C. 134 (j) (2) (B)) must include a "financial plan" that "indicates resources from public and private sources that are reasonably expected to be available to carry out the program". Additionally, the STIP may include a similar financial plan (23 U.S.C. 135 (g)(5)(F)). The purpose of the financial plan is to demonstrate fiscal constraint. These requirements are implemented in our transportation planning regulations for the metropolitan long-range transportation plan, TIP, and STIP. These regulations provide, in essence, that a long-range transportation plan and TIP can include only projects for which funding "can reasonably be expected to be available" [23 CFR 450.322(f)(10) (metropolitan long-range transportation plan), 23 CFR 450.324(h) (TIP), and 23 CFR 450.216(m)(STIP)]. In addition, the regulations provide that projects in air quality nonattainment and maintenance areas can be included in the first two years of the TIP and STIP only if funds are "available or committed" [23 CFR 450.324(h) and 23 CFR 450.216(m)]. Finally, the Clean Air Act's transportation conformity regulations specify that a conformity determination can only be made on a fiscally constrained long-range transportation plan and TIP [40 CFR 93.108].

**Observations:**

The CRCOG's Capital Region Transportation Plan (RTP) includes a clear comparison of costs and revenues, demonstrating fiscal constraint for the proposed capital investments. It also includes illustrative projects for which funding has not yet been secured. However, although the plan claims fiscal constraint for operating and maintenance costs, it lacks a detailed breakdown of projected revenues demonstrating this fiscal constraint.

Financial analysis by CTDOT on the STIP indicates that the CRCOG TIP is fiscally constrained, and USDOT reviews and approves the STIP for fiscal constraint. However, the Financial Summary section of the TIP lacks a side-by-side comparison of projected costs and revenues. The document therefore does not clearly demonstrate fiscal constraint.

**Recommendations:**

The CRCOG should include a breakdown of projected revenues for operating and maintenance costs as part of its RTP. The format currently used to demonstrate fiscal constraint for the RTP's proposed capital investments would be acceptable for use in the operating and maintenance costs section as well.

The CRCOG should include in the Financial Summary section of its TIP a detailed side-by-side comparison of projected costs and revenues available, with clear titles and labels such that fiscal constraint can be easily determined. CRCOG is encouraged to include illustrative projects for which revenues are not currently available.
Air Quality

Regulatory Basis:

For MPOs that the EPA classifies as air quality nonattainment or maintenance areas, many special requirements apply to the metropolitan planning process. Section 176 (c)(1) of the Clean Air Act Amendments of 1990 (CAAA) states: “No metropolitan planning organization designated under section 134 of title 23, United States Code, shall give its approval to any project, program, or plan which does not conform to an implementation plan approved or promulgated under section 110”. The Intermodal Surface Transportation Efficiency Act of 1991 (ISTEA) includes provisions in response to the CAAA mandates.

Observations:

The CRCOG MPO operates in the Greater Connecticut Air Quality district. The region is considered in Non-attainment for ozone.

Conclusion:

The CRCOG has participated in agency consultations for air quality conformity and has complied with the standards and procedures for conformity determinations. The CRCOG’s stated policy in its Long-Range Transportation Plan reflects a concern and responsibility for preserving air quality, and the MPO’s focus to take a multimodal approach to attack the problem in the Capitol Area through development of Transportation Demand Management/Transportation Supply Management (TDM/TSM) strategies is positive.
Self-Certification

Self-Certification of the metropolitan 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 that the planning process is addressing the major issues facing the area and is conducted in accordance with all applicable requirements of 23 CFR 450.300 and:

- 23 U.S.C. 134 and 49 U.S.C. 5303 and Sections 174 and 176(c) and (d) of the Clean Air Act (if applicable)
- Title VI of the Civil Rights Act of 1964 and the Title VI assurance executed by each State
- 49 U.S.C. 5332, prohibiting discrimination on the basis of race, color, creed, national origin, sex, or age in employment or business opportunity
- Section 1101(b) of SAFETEA-LU and 49 CFR Part 26, regarding involvement of DBE in U.S. DOT-funded planning projects
- 23 CFR Part 230, regarding the implementation of an equal employment opportunity program on Federal and Federal-aid highway construction contracts
- ADA and U.S. DOT regulations governing transportation for people with disabilities [49 CFR Parts 27, 37, and 38]
- Older Americans Act as amended, prohibiting discrimination on the basis of age Section 324 of Title 23 U.S.C., regarding the prohibition of discrimination based on gender
- Section 504 of the Rehabilitation Act of 1973 and 49 CFR Part 27, regarding discrimination against individuals with disabilities
- All other applicable provisions of Federal law (e.g., while no longer specifically noted in a self-certification, prohibition of use of Federal funds for “lobbying” still applies and should be covered in all grant agreement documents (see 23 CFR 630.112).

A Certification Review by FTA and FHWA of the planning process in TMAs is required at least once every four years, in addition to the required self-certification by the MPO and State.

Observations:

The CRCOG has consistently reiterated its adherence to the federal planning requirements of MPOs in the years between formal federal certifications by evidencing its products and processes to the FHWA and FTA.

Conclusions:

The CRCOG meets the self-certification requirements of 23 CFR 450.334.
Environmental Mitigation

Regulatory Basis:

The specific requirements for environmental mitigation are set forth in connection with the MTP in 23 CFR 450.322 (f) (7). However, the basis for addressing environmental mitigation is detailed in sections addressing consultation (23 CFR 450.316 (a) (1) (2) (3) and (b) – Interested parties, participation, consultation; 23 CFR 450.322 (g) (1) (2), (i), and (j) – Development and content of the metropolitan transportation plan.

Observations:

The Route 6 Corridor Study recommended “green infrastructure” strategies which evidences consideration of innovative mitigation activities. The Long-Range Transportation Plan (LRTP) has a discussion of environmental mitigation as required in the CFR. However, the LRTP does not expand this discussion based on the acknowledgement that such discussion would require more project-oriented data than is provided in the LRTP.

Conclusions:

Even though the rationale for a limited discussion in the LRTP of environmental mitigation is valid, 23 CFR 450.322(f)(7) provides an option for the discussion of environmental mitigation to exist in terms of policy, instead of or addition to projects.

Recommendation:

For the next update of the RTP, the MPO should include an environmental policy discussion, in lieu of a project discussion, in terms of implementation of mitigation activities to minimize environmental impacts of transportation improvements (for example, low-impact development or green strategies for infrastructure improvements). USDOT will provide more specific direction in environmental mitigation.
**List of Obligated Projects**

*Regulatory Basis:*

The MPO, transportation operators and the State must cooperatively develop a listing of projects for which Federal funds have been obligated in the previous year in accordance with 23 CFR 450.332 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 of phase
- Identification of the agencies responsible for carrying out the project or phase

*Observations:*

CTDOT provides the annual list of obligated projects to all of the MPOs in the state for posting and/or publishing.

*Conclusions:*

The CRCOG complies with the Federal regulations in regards to publicizing and providing access to the list.

---

**Security in the Planning Process**

*Regulatory Basis:*

Federal legislation has separated security as a stand-alone element of the planning process (both metropolitan 23 CFR 450.306(a)(3) and Statewide 23 CFR 450.206(a)(3) planning). The regulations also state that the degree and consideration of security should be based on the scale and complexity of many different local issues.

*Observations:*

The CRCOG’s RTP contains a discussion of security, one of the eight federal planning factors. The MPO recognizes the cross-over of security and safety and notes the public safety and TIM work that has been part of the agency’s work program for many years.

*Conclusions:*

The MPO fulfills the requirement of the referenced CFRs.

*Commendation:*

The CRCOG has established a strong working relationship with emergency managers in the region to align goals, share resources and implement improvements throughout the transportation network.
Integrating Freight in the Transportation Planning Process

Regulatory Basis:

23 U.S.C. 134 (a) and 23 CFR 450.306(4), 450.316(a), 450.316(b), 450.104 - Metropolitan transportation planning section indicates that:

“It is in the national interest to encourage and promote the safe and efficient management, operation, and development of surface transportation systems that will serve the mobility needs of people and freight and foster economic growth and development within and between States and urbanized areas, while minimizing transportation related fuel consumption and air pollution through metropolitan and Statewide transportation planning processes identified in this chapter; and encourage the continued improvement and evolution of the metropolitan and Statewide transportation planning processes by MPOs, State departments of transportation, and public transit operators as guided by the planning factors identified in subsection (h) and section 135(d).

In addition, 23 CFR 450.316(a) states:

“The MPO shall develop and use a documented participation plan that defines a process for providing citizens, affected public agencies, representatives of public transportation employees, freight shippers, providers of freight transportation services, private providers of transportation, representatives of users of public transportation, representatives of users of pedestrian walkways and bicycle transportation facilities, representatives of the disabled, and other interested parties with reasonable opportunities to be involved in the metropolitan transportation planning process.”

Observations:

The CRCOG has participated in the FHWA “Talking Freight” webinars, and staff remains available to take part in any CT freight advisory group. While the CRCOG has correctly identified that lack of awareness of freight issues on multiregional and multistate levels exist, there have not been activities initiated by the CRCOG to improve this status. Outreach to freight shippers, as noted in 23 CFR 450.316(a), has not been evidenced.

Conclusions:

While the CRCOG has participated in the “Talking Freight” webinars and staff remains available to participate in any CT freight advisory group, as outlined in their response to recommendations from the 2009 Federal Certification Review and which appears in their UPWP in effect, specific, regionally based planning tasks in freight planning have not advanced beyond the 2005 Global Insights report. While the CRCOG is correct that efforts for effective freight planning needs to be enacted on a statewide or greater basis, the essential groundwork for building greater efforts requires local focus.

Corrective Action:

• Corrective Action: The CRCOG shall develop a regionally based freight planning program, to be part of the Metropolitan Planning Organization’s Unified Planning Work Program for 2014-2015. This program must include strategies for outreach to shippers, carriers and other freight providers and organizations in the Hartford Urbanized Area and develop an inventory and mapping of the regional freight network of terminals which requires consultation with freight providers, among others, and distribution centers and locations of freight bottlenecks and deficient infrastructure by March 2015, with assistance from FHWA, where needed, in order to comply with the federal citations below.
Corrective Action Citations:

23 CFR 450.306 Scope of the metropolitan transportation planning process.

(b) The metropolitan transportation planning process shall be continuous, cooperative, and comprehensive, and provide for consideration and implementation of projects, strategies, and services that will address the following factors:

(2) Support the economic vitality of the metropolitan area, especially by enabling global competitiveness, productivity, and efficiency;

(4) Increase accessibility and mobility of people and freight;

(6) Enhance the integration and connectivity of the transportation system, across and between modes, for people and freight;

23 CFR 450.316, Interested parties, participation, and consultation.

(a) The MPO shall develop and use a documented participation plan that defines a process for providing citizens, affected public agencies, representatives of public transportation employees, freight shippers, providers of freight transportation services, private providers of transportation, representatives of users of public transportation, representatives of users of pedestrian walkways and bicycle transportation facilities, representatives of the disabled, and other interested parties with reasonable opportunities to be involved in the metropolitan transportation planning process.

Documentation

Basic Requirement:

While the planning regulations do not specifically define the extent of documentation, various regulations do call for the preparation of products: a UPWP, Public Participation Plan (PPP), an MTP, a TIP, a CMP, an Annual Listing of obligated projects, and a revenue forecast, to name a few. Also, 23 CFR 420.117(e) calls for preparation of suitable reports that document the results of activities performed with FHWA planning funds.

Observation:

The CRCOG maintains extensive records of required transportation planning products and provides public dissemination of such records.

Conclusion:

The MPO fulfills the requirements of this section.
Appendix I – On-Site Meeting Agenda

Hartford Transportation Management Area (TMA) Certification Review
Agenda
September 23, 2013
GHTD Training Room, 1 Union Place, Hartford CT

Morning Session

8:00 – 8:15  Introduction of Review
8:15 – 8:30  Review of Recommendations from 2009 Federal Transportation MPO Review
8:30 – 9:15  Planning for Operations, ITS, Safety and Congestion Management
9:15 – 9:45  Programming Efforts (STP-Urban, CMAQ, Transportation Alternatives, Local Transportation Capital Improvement Program)
9:45 – 10:00  Break
10:00 – 10:15  Regular Transportation Committee Business (if any)
10:15 – 10:45  Transportation Committee and Public Input
  • Discussion with Committee members and other interested persons regarding CRCOG’s planning process
10:45 – 11:15  Public Involvement, Title VI, Environmental Justice and Limited English Proficiency Activities
11:15 – 12:00  Recent and Planned Special Studies (Transit and Highway)
12:00 – 1:00  Lunch

Afternoon Session

1:00 – 2:15  Intermodal Transportation Planning and Livability/Sustainability
  • Transit & TOD Planning
  • Bicycle and Pedestrian Planning
  • CTfastrak, New Haven – Hartford – Springfield Rail, Airport and Freight Planning
2:15 – 2:45  MPO Coordination: CRCOG, CCRPA, RiverCOG, PVPC
2:45 – 3:00  Break
3:00 – 3:45  Building Technical Capabilities
  • Travel Forecasting (CTfastrak Service Planning, Use in Corridor Studies) and Modal Update
  • WebGIS and Data Initiatives
3:45 – 4:00  Wrap Up

NOTE TO PERSONS WITH SPECIAL NEEDS:
We do not discriminate on the basis of disability. Individuals who need auxiliary aids are invited to make their needs known by contacting us by mail, phone, fax or email as soon as possible. Un traductor estará disponible para esta reunión si usted lo solicita al 522-2217, lo más pronto posible.

Andover / Avon / Bloomfield / Bolton / Canton / East Granby / East Hartford / East Windsor / Ellington / Enfield / Farmington / Glutenbury / Granby / Hartford / Hebron / Manchester / Middletown / Newington / Rocky Hill / Simsbury / Southington / South Windsor / Stafford / Suffield / Tolland / Vernon / West Hartford / Wethersfield / Windsor / Windsor Locks

A voluntary Council of Governments formed to initiate and implement regional programs of benefit to the towns and the region
Appendix II – Attendance Sheet for On-site Meeting

TMA-Certification Review
Attendance Sheet
Monday September 23, 2013

<table>
<thead>
<tr>
<th>Guests</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Grayson Wright</td>
<td>ConnDOT</td>
</tr>
<tr>
<td>Maribeth Wojenski</td>
<td>ConnDOT</td>
</tr>
<tr>
<td>Hal Decker</td>
<td>ConnDOT</td>
</tr>
<tr>
<td>Robert Ramirez</td>
<td>FHWA-CT Division</td>
</tr>
<tr>
<td>Tina Lee</td>
<td>FHWA-CT Division</td>
</tr>
<tr>
<td>Erik Shortell</td>
<td>FHWA-CT Division</td>
</tr>
<tr>
<td>Eloise Powell</td>
<td>FHWA-CT Division</td>
</tr>
<tr>
<td>Ken Shooshan-Stoller</td>
<td>FHWA-CT Division</td>
</tr>
<tr>
<td>Nicolas Garcia</td>
<td>FTA-Region 1</td>
</tr>
<tr>
<td>Noah Berger</td>
<td>FTA-Region 1</td>
</tr>
<tr>
<td>Jeff Price</td>
<td>FTA-Office of Planning HQDC</td>
</tr>
<tr>
<td>John Kennedy</td>
<td>USDOT-CT</td>
</tr>
<tr>
<td>Vicki Shottland</td>
<td>GHTD</td>
</tr>
<tr>
<td>Aaron Nash</td>
<td>City of Hartford</td>
</tr>
<tr>
<td>Peter Hughes</td>
<td>Marlborough</td>
</tr>
<tr>
<td>Al Sylvestre</td>
<td>CTDOL</td>
</tr>
<tr>
<td>Bill McKinstry</td>
<td>New Britain Transportation</td>
</tr>
<tr>
<td>Gary Roux</td>
<td>PVPC</td>
</tr>
<tr>
<td>Rob Haramut</td>
<td>RiverCOG</td>
</tr>
<tr>
<td>Francis Pickering</td>
<td>CCRPA</td>
</tr>
<tr>
<td>Bradshaw Smith</td>
<td>Citizen/Windsor</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Staff</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Jennifer Carrier</td>
<td>CRCOG</td>
</tr>
<tr>
<td>MaryEllen Kowalewski</td>
<td>CRCOG</td>
</tr>
<tr>
<td>Rob Aloise</td>
<td>CRCOG</td>
</tr>
<tr>
<td>Lia Huang</td>
<td>CRCOG</td>
</tr>
<tr>
<td>Emily Hultquist</td>
<td>CRCOG</td>
</tr>
<tr>
<td>Mario Marrero</td>
<td>CRCOG</td>
</tr>
<tr>
<td>Karen Olson</td>
<td>CRCOG</td>
</tr>
<tr>
<td>Pramod Pandey</td>
<td>CRCOG</td>
</tr>
<tr>
<td>Erik Snowden</td>
<td>CRCOG</td>
</tr>
<tr>
<td>Karen Stewartson</td>
<td>CRCOG</td>
</tr>
<tr>
<td>Lyle Wray</td>
<td>CRCOG</td>
</tr>
<tr>
<td>Ming Zhao</td>
<td>CRCOG</td>
</tr>
</tbody>
</table>
Appendix III – Support Letter

SENATOR STEPHEN T. CASSANO
Fourth District
Legislative Office Building
Room 2100
Hartford, CT 06106-1591
Tel. (860) 240-5302

State of Connecticut
SENATE

Amy Jackson-Grove, Division Administrator
Federal Highway Administration
628-2 Hebron Avenue, Suite 303
Glastonbury, CT 06033

September 24, 2013

Dear Ms. Jackson-Grove:

Thank you for seeking my input regarding an evaluation of Capitol Region Council of Government’s (CRCOG) transportation planning process.

I have been involved with the CRCOG dating back to 1977 when I served as deputy mayor of Manchester, CT.

Since 2010 I have served as a State Senator representing the towns of Andover, Bolton, Glastonbury and Manchester. In that capacity I serve on the joint legislative Transportation committee.

I have worked closely with CRCOG over the last few years as they championed several transportation projects including CTfastrak. Priorities have included Transit Oriented Development within the corridor, greening the project, delivering the project on-time, and ensuring that public education, outreach and marketing are delivered effectively.

CRCOG has established itself as a leader, organizing regional forums for strategizing on methods to improve safety and maintain good operations throughout the region. In my experience I have found that CRCOG’s transportation planning efforts have been exceptional and they have well represented the needs of municipalities and other stakeholders.

Thank you again for this opportunity to comment. And, please feel free to reach out to me with any questions or concerns.

Sincerely,

Steve Cassano
State Senator
Fourth District