



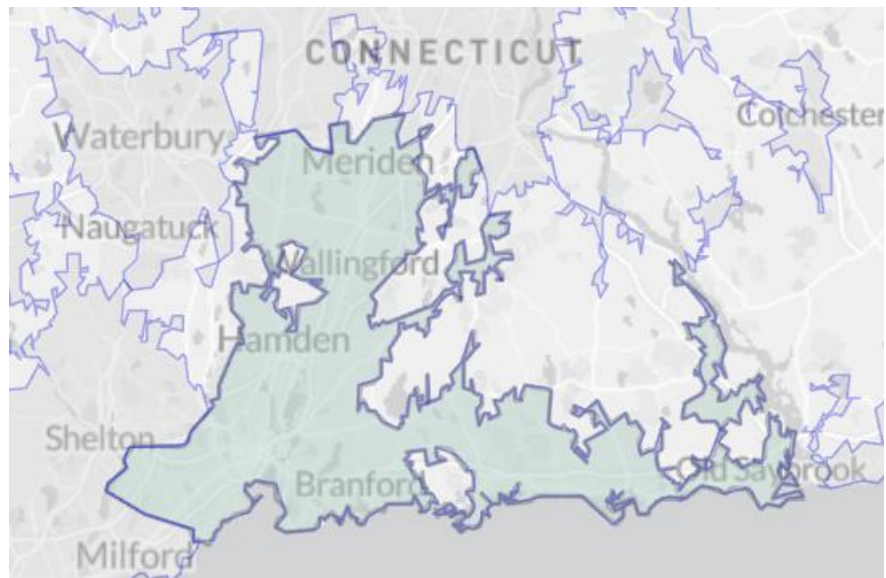
U.S. Department
of Transportation

Transportation Management Area Planning Certification Review

Federal Highway
Administration

Federal Transit
Administration

New Haven, CT Transportation Management Area



May 26, 2021





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1.0 EXECUTIVE SUMMARY

The Federal Highway Administration (FHWA) and the Federal Transit Administration (FTA) conducted the certification review of the transportation planning process for the New Haven – CT urbanized area through a series of virtual meetings held March 2, 3 and 4 2021 in lieu of an on-site meeting. FHWA and FTA are required to jointly review and evaluate the transportation planning process for each urbanized area over 200,000 in population at least every four years to determine if the process meets the Federal planning requirements.

1.1 Summary of Current Findings

As a result of this review, FHWA and FTA are certifying the transportation planning process conducted by Connecticut Department of Transportation (CTDOT), South Central Regional Council of Governments (SCRCOG), Lower Connecticut River Valley Council of Governments (RiverCOG) – the Metropolitan Planning Organizations (MPO), and the region’s public transportation operators subject to addressing corrective actions. There are also recommendations in this report that warrant close attention and follow-up, as well as areas the MPOs are performing very well in that are to be commended.

South Central Regional MPO	
Review Area	Corrective Actions/ Recommendations/ Commendations
MPO Structure and Cooperation	<p>Corrective Action: SCRCOG and CTDOT should work together to formally include a state transportation official on the MPO Board, to comply with 23 CFR 450.310(d), no later than December 31, 2021. FHWA and FTA can provide guidance as needed.</p> <p>Recommendation: The MPO should consider amending their bylaws or developing other documentation to better clarify roles, responsibilities and the MPO voting structure as well as defining the Transportation and Transportation Technical Committees.</p> <p>Recommendation: In cooperation with the region’s transit providers, SCRCOG should more formally define the process by which a transit representative to the MPO board is selected, as well as an option to assign an alternate. This will ensure a continuous voice for transit even as board members change over time. The MPO may consider including this in updated bylaws.</p>
TMA Coordination	<p>Corrective Action: An MOU must be developed describing how transportation planning efforts are coordinated between agencies within the New Haven TMA, in accordance with 23 CFR 450.314(e) regulation. The TMA MOU must be executed by all parties on or before December 31, 2021.</p>



Review Area	Corrective Actions/ Recommendations/ Commendations
Financial Planning	<p>Recommendation: The federal team understands the collaboration between CTDOT and MPOs as it relates to providing financial projections for the MTP. It is recommended that the MPO takes a more active role in the development of the financial plan and better document its coordination with CTDOT and local transit providers. The MPO should ensure these projections are analyzed and summarized in a way that demonstrates fiscal constraint for the MTP.</p> <p>Recommendation: The TIP should be improved to include a clear comparison of anticipated revenues and programmed expenditures demonstrating financial constraint. Continued coordination with CTDOT will ensure reasonable funding program estimates. The TIP document should include a summary demonstrating financial constraint by year by funding source.</p>
Transit Planning	<p>Recommendation: An updated LOCHSTP should be developed in a collaborative process with seniors; individuals with disabilities; representatives of public, private, nonprofit transportation and human service providers; and other members of the public. The designated recipient is not directly responsible for developing the coordinated plan but is responsible for ensuring that the plan from which a selected project was included is developed in compliance with the statutory requirements. An agency or organization other than the designated recipient may take the lead in developing the coordinated plan. As of April 2021, CTDOT has committed to developing an updated LOCHSTP by the end of the calendar year. The State and MPOs should cooperatively ensure this process is completed</p> <p>Recommendation: In the next MTP update, the MPO should provide a narrative to document its coordination and collaborative efforts with local transit providers. The MPO should detail its working relationships and continue to demonstrate how the MPO supports transit planning for the wide range of transit services in the region.</p>
Transportation Improvement Program	<p>Commendation: SCRCOG is commended for their TIP action and amendment process which transparently shares detailed information on projects and tracks financial histories, assisting MPO officials and the public in making sound decisions.</p> <p>Recommendation: SCRCOG should coordinate with the CTDOT to understand the eTIP platform that is under development and how it may or may not be compatible with the region's existing TIP database. Early coordination could identify opportunities to make the two systems more harmonious.</p>



Review Area	Corrective Actions/ Recommendations/ Commendations
Continued - Transportation Improvement Program	Recommendation: As SCRCOG considers the future of the TIP management system and collaboration with the eSTIP initiative, it is recommended that the feasibility of creating an on-line, visual TIP be explored in partnership with CTDOT. This visual TIP could provide location-based TIP projects along with project descriptions, histories and photos.
Public Participation	Recommendation: SCRCOG is encouraged to research and consider new public involvement tools that may enhance current processes. Additionally, the region should consider the needs and concerns from groups that are traditionally underserved and underrepresented by the existing transportation and assess how those groups can be better engaged in transportation planning.
Civil Rights Title VI Civil Rights Act, 23 U.S.C. 324, Age Discrimination Act, Sec. 504 Rehabilitation Act, Americans with Disabilities Act	<p>Title VI – Recommendation: The MPO should develop a new complaint form that will accurately capture the nondiscrimination statutes and protections. The new complaint form should be limited to race, age, color, disability, national origin and sex. In addition, all complaints filed directly with the MPO should be forwarded and processed by CTDOT in accordance with the complaint procedures required under 23 CFR 200.9(b)(3). Copies of these complaints should be sent to FHWA and FTA.</p> <p>ADA Recommendation: The MPO is recommended to work with CTDOT to educate municipalities on their responsibilities under ADA and Section 504 to ensure that all programs, activities, and services under the municipality’s jurisdiction are examined to identify barriers to access for persons with disabilities. With CTDOT’s assistance, an ADA Transition Plan or Program Access Plan should be developed which would describe the steps to ensure the municipality’s program areas are accessible to persons with disabilities.</p> <p>ADA Recommendation: The MPO should assess how it communicates with disabled persons. Alternative formats such as TTY (Teletypewriter) and TDD (Telecommunication Device for the Deaf) or relay services that will allow hearing-impaired individuals to communicate through the telephone to receive information from the MPO should be considered. As discussed at the certification review, CTDOT is willing to provide technical assistance on the alternative formats to fully communicate with people with disabilities.</p>



Review Area	Corrective Actions/ Recommendations/ Commendations
Continued - Civil Rights Title VI Civil Rights Act, 23 U.S.C. 324, Age Discrimination Act, Sec. 504 Rehabilitation Act, Americans with Disabilities Act	EJ Recommendation: To be consistent with the Executive Order on EJ, the MPO will need to conduct a benefit and burden analysis on projects selected in the TIP and MTP. The data collection and analysis should be consistent in its consideration of all groups under Title VI and not limited to minority individuals. Title VI protected classes include persons of any race, color and national origin. The MPO staff should become familiar with the requirements of the EJ Executive order and associated guidance. Staff is recommended to take the virtual NHI EJ class, course number FHWA-NHI-142074 to under the basics of EJ and document the analysis in the TIP and LRTP. The Review Team is available to provide technical assistance as needed.
Transportation Safety	Recommendation: SCRCOG should work with the Safety Office at the CTDOT to obtain guidance on how the RTSP may be used to obtain funding to implement specific safety improvements identified within the RTSP. These discussions should also address the concerns SCRCOG raised with respect to the liability, if any, that exists with the publication of the RTSPs.
Transportation Security Planning	Recommendation: Ensuring diversion routes are easily available to regional first responders and up to date would be a benefit within the region. SCRCOG is encouraged to work with CTDOT, First Responders, and other stakeholders to update previous plans if necessary and post the plans in a location accessible to first responders.
Nonmotorized Planning / Livability	Recommendation: SCRCOG has an extensive network of transit services that connect to critical educational, employment, health and housing facilities. It may be beneficial to graphically identify areas of opportunity, ensuring regional transit assets are providing the optimal access to these facilities in addition to an enhanced quality of life.
Performance Management	Recommendation: In the next MTP update, the MPO should include a system performance report that contains the performance targets it has adopted for all performance measures as well as include information describing the existing conditions of assets and system performance and the progress made toward achieving the performance targets in comparison to previous reports. This information should be included in the MTP as a stand-alone chapter or as an independent document and updated in synchronization with the MTP. The MPO has the option to update the report more frequently and can include progress on a year by year basis. Recommendation: The TIP should include a description of the effect projects and programs in the TIP have in achieving performance targets identified in the MTP.



Review Area	Corrective Actions/ Recommendations/ Commendations
Congestion Management Process / Management and Operations	<p>Recommendation: Federal regulations cited in 23 CFR 450.320(a) call for a TMA-wide CMP process and product. With the next update of the CMP, the MPOs should collaborate with NVCOG to ensure congested corridors in TMA portions of Cheshire are accounted for.</p> <p>Recommendation: To ensure congestion is managed through an integrated, multi-modal process, the MPOs should collaborate with transit agencies to obtain available transit data (such as on-time performance) for analysis and inclusion in the next CMP.</p> <p>Recommendation: Coordination with CTDOT as it relates to ITS within the SCRCOG region is essential, ensuring that future opportunities are identified and planned for. Opportunities for planning, designing, and incorporating ITS elements (e.g. traffic signal technologies, cameras, roadway weather information systems) into regionally sponsored projects should be continually considered. The region should also consider collaborating with CTDOT as it relates to Computerized Traffic Signal Systems needs within the region.</p>
Environmental Mitigation	<p>Recommendation: The MPO should expand the Environmental Mitigation discussion in the MTP to document required consultation activities and to identify the types of mitigation strategies that may have the greatest potential to restore and maintain the environmental functions affected by the MTP. The MPO should also include the potential areas for which these strategies can be used.</p> <p>Recommendation: Establish and document relationships with Tribal, State, and local agencies responsible for land use management, natural resources, environmental protection, conservation, and historic preservation concerning the development of the MTP. It would be useful to develop a list of resource agencies and contacts consulted, as well as any consultation agreements, and include it as an appendix in the next update of the MTP. References in the documents should include any existing conservation plans, land use planning maps, resource maps, and natural or historic/cultural resource inventories, as appropriate, utilized in developing the MTP.</p> <p>Recommendation: It is recommended to invite CTDEEP's appropriate Watershed Manager(s) to participate in their programmatic and project level consultation efforts. The Watershed Manager may be able to provide assistance in prioritizing projects based on environmental complexity or regional resource goals. Their stakeholder liaison role gives them broad familiarity with watershed planning documents, funding availability, and which sources may be able to be used as State match under Title 23.</p>



Lower CT River Valley MPO	
Review Area	Corrective Actions/ Recommendations/ Commendations
MPO Structure and Cooperation	<p>Recommendation: RiverCOG and CTDOT should work together to ensure the state transportation official to the MPO board is well-defined and engaged. FHWA and FTA can provide guidance as needed.</p> <p>Recommendation: The MPO should consider amending their bylaws or developing other documentation to better clarify roles, responsibilities, and the MPO voting structure.</p>
TMA Coordination	<p>Corrective Action: An MOU must be developed describing how transportation planning efforts are coordinated between agencies within the New Haven TMA, in accordance with 23 CFR 450.314(e) regulation. The TMA MOU must be executed by all parties on or before December 31, 2021.</p>
Financial Planning	<p>Recommendation: It is recommended that the MPO take a more active role in the development of the financial plan and better document its coordination with CTDOT and local transit providers in the process. The MPO should clearly demonstrate financial constraint in the MTP based on reasonably anticipated funding for the region.</p> <p>Recommendation: The TIP should be improved to include a clear comparison of anticipated revenues and programmed expenditures demonstrating financial constraint. Continued coordination with CTDOT will ensure reasonable funding program estimates. The TIP document should include a summary demonstrating financial constraint by year by funding source.</p>
Transit Planning	<p>Recommendation: An updated LOCHSTP should be developed in a collaborative process with seniors; individuals with disabilities; representatives of public, private, nonprofit transportation and human service providers; and other members of the public. The designated recipient is not directly responsible for developing the coordinated plan but is responsible for ensuring that the plan from which a selected project was included is developed in compliance with the statutory requirements. An agency or organization other than the designated recipient may take the lead in developing the coordinated plan. As of April 2021, CTDOT has committed to developing an updated LOCHSTP by the end of the calendar year. The State and MPOs should cooperatively ensure this process is completed.</p>



Review Area	Corrective Actions/ Recommendations/ Commendations
Continued - Transit Planning	<p>Commendation: The federal team commends the MPO for the work on the transit system study that identified the benefits of integrating the region’s two bus providers and working to achieve the goal for improving and more effectively delivering transit service. As the merger progresses the MPO should continue to be intimately involved in executing the recommendations from the Lower Connecticut River Valley Regional Bus Integration Study.</p> <p>Recommendation: It is recommended that the MPO provide better documentation of its collaborative efforts with transit providers.</p>
Transportation Improvement Program	<p>Recommendation: The MPO should ensure the current TIP, including any adopted amendments, can be easily found online. Although not ideal, a PDF of the amendments can be posted to the RiverCOG website in the short term, until an enhanced process can be developed.</p> <p>Recommendation: RiverCOG should make the list of federally obligated projects available on-line, to enhance transparency and comply with 23 CFR 450.334</p> <p>Recommendation: RiverCOG should continue to collaborate with CTDOT as it relates to a potential statewide mapping tool and, if it does not appear to be feasible, RiverCOG should consider the expansion of the on-line tool developed under the POCD effort to enhance the regional TIP.</p>
Public Participation	<p>Commendation: RiverCOG is commended for their multi-faced approach to engaging the public throughout the transportation planning process and engaging public transit agencies during the update of the PPP.</p>
Civil Rights Title VI Civil Rights Act, 23 U.S.C. 324, Age Discrimination Act, Sec. 504 Rehabilitation Act, Americans with Disabilities Act	<p>Title VI: The MPO’s planning process regarding this topic area is consistent with the applicable federal requirements.</p> <p>ADA Recommendation: The MPO is recommended to work with CTDOT to educate municipalities on their responsibilities under ADA and Section 504 to ensure that all programs, activities, and services under the municipality’s jurisdiction are examined to identify barriers to access for persons with disabilities. With CTDOT’s assistance, an ADA Transition Plan or Program Access Plan should be developed which would describe the steps to ensure the municipality’s program areas accessible to persons with disabilities.</p>
Transportation Safety	<p>Recommendation: RiverCOG should work with the Safety Office at the CTDOT to advance and finalize the RTSP, discussing potential solutions to publication of the documentation considering regional concerns.</p>



Review Area	Corrective Actions/ Recommendations/ Commendations
Performance Management	<p>Recommendation: The next MTP update should include a System Performance Report as a chapter in the MTP or as an independent stand-alone document describing the performance of the transportation system. The MPO should decide whether this information will be provided in a quantitative or qualitative format but should include all federally required measures and associated targets along with information describing the existing conditions of assets and system performance and the progress made toward achieving the performance target in comparison to previous reports. The MPO should also synchronize the System Performance Report update with the MTP although the MPO has the option to update the report more frequently and can include progress made on a year by year basis.</p> <p>Recommendation: The TIP should include a description of what the effects of the projects in the TIP are anticipated to be in working toward achievement of the adopted performance targets.</p>
Congestion Management Process / Management and Operations	<p>Recommendation: Federal regulations cited in 23 CFR 450.320(a) call for a TMA-wide CMP process and product. With the next update of the CMP, the MPOs should collaborate with NVCOG to ensure congested corridors in TMA portions of Cheshire are accounted for.</p> <p>Recommendation: To ensure congestion is managed through an integrated, multi-modal process, the MPOs should collaborate with transit agencies to obtain available transit data (such as on-time performance) for analysis and inclusion in the next CMP.</p> <p>Recommendation: Coordination with CTDOT as it relates to ITS within the RiverCOG region is recommended, ensuring that future opportunities are identified and planned for. Opportunities for planning, designing, and incorporating ITS elements where appropriate (e.g. traffic signal technologies) into regionally sponsored projects should be considered.</p>



Review Area	Corrective Actions/ Recommendations / Commendations
Environmental Mitigation	<p>Recommendation: It is recommended that a list of resource agencies consulted, and contacts, as well as any consultation agreements, be included as an appendix in the next update of the MTP. References in the documents should include any existing conservation plans, land use planning maps, resource maps, and natural or historic/cultural resource inventories, as appropriate, utilized in developing the MTP.</p> <p>Recommendation: Ensure a process is followed to document the intergovernmental and interagency consultation efforts that are undertaken, as well as any consultation agreements that may exist. Explicitly include Tribal and historic/cultural resource agencies in the consultation process. Consider inviting CTDEEP's appropriate Watershed Manager(s) to participate in their programmatic and project level consultation efforts. The Watershed Manager may be able to help MPOs prioritize projects based on environmental complexity or regional resource goals. Their stakeholder liaison role gives them broad familiarity with watershed planning documents and funding availability and which sources may be able to be used as State match under Title 23.</p>

Details of the certification findings for each of the above items are contained in this report.



2.0 INTRODUCTION

2.1 Background

Pursuant to 23 U.S.C. 134(k) and 49 U.S.C. 5303(k), the Federal Highway Administration (FHWA) and the Federal Transit Administration (FTA) must jointly certify the metropolitan transportation planning process in Transportation Management Areas (TMAs) at least every four years. A TMA is an urbanized area, as defined by the U.S. Census Bureau, with a population of over 200,000. After the 2010 Census, the Secretary of Transportation designated 183 TMAs – 179 urbanized areas over 200,000 in population plus four urbanized areas that received special designation. In general, the reviews consist of three primary activities: a site visit, a review of planning products (in advance of and during the site visit), and preparation of a Certification Review Report that summarizes the review and offers findings. The reviews focus on compliance with Federal regulations, challenges, successes, and experiences of the cooperative relationship between the MPO(s), the State DOT(s), and public transportation operator(s) in the conduct of the metropolitan transportation planning process. Joint FTA/FHWA Certification Review guidelines provide agency field reviewers with latitude and flexibility to tailor the review to reflect regional issues and needs. As a consequence, the scope and depth of the Certification Review reports will vary significantly.

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

While the Certification Review report itself may not fully document those many intermediate and ongoing checkpoints, the “findings” of Certification Review are, in fact, based upon the cumulative findings of the entire review effort.

The review process is individually tailored to focus on topics of significance in each metropolitan planning area. Federal reviewers prepare Certification Reports to document the results of the review process. The reports and final actions are the joint responsibility of the appropriate FHWA and FTA field offices, and their content will vary to reflect the planning process reviewed, whether or not they relate explicitly to formal “findings” of the review.



2.2 Purpose and Objective

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

The South Central Regional Connecticut Council of Governments (SCRCOG) and the Lower Connecticut River Valley Council of Governments (RiverCOG) are the two designated MPOs for the New Haven urbanized area. The Central Naugatuck Valley MPO (CNVMPO) has a small portion of the New Haven urbanized area as well. The Connecticut Department of Transportation (CTDOT) is the responsible State agency and CT*transit* New Haven Division, the Greater New Haven Transit District (GNHTD), Milford Transit District (MTD), and Middletown Transit District (MTD) are the primary public transportation operators within the TMA with Estuary Transit District (ETD), and Shoreline East (SLE) also providing transit services.

Municipalities served by each COG are summarized below along with towns that fall within the New Haven TMA. Towns noted with an ‘*’ do not have New Haven TMA areas.

SCRCOG		RiverCOG		New Haven TMA
Bethany*	New Haven	Chester	Killingworth	Municipalities in
Branford	North Branford	Clinton	Lyme*	other MPOs
East Haven	North Haven	Cromwell*	Middlefield	Cheshire - CNVMPO
Guilford	Orange	Deep River	Middletown	Prospect - CNVMPO
Hamden	Wallingford	Durham	Old Lyme*	
Madison	West Haven	East Haddam*	Old Saybrook	
Meriden	Woodbridge*	East Hampton*	Portland*	
Milford*		Essex	Westbrook	
		Haddam		

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



3.0 SCOPE AND METHODOLOGY

3.1 Review Process

Participants in the review included representatives of FHWA, FTA, CTDOT, SCRCOG, RiverCOG and public transit providers. A full list of participants is included in Appendix A, along with copies of the agendas for each virtual meeting which were held March 2, 3, and 4, 2021. Opportunities for public comment were provided via a virtual meeting held on March 10, 2021 and input from MPO members was also solicited. Written comments were also accepted through email and regular mail submittals.

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

The certification review covers the transportation planning process conducted cooperatively by the MPOs, State, and public transportation operators. Background information, current status, key findings, and recommendations are summarized in the body of the report for key topic areas. While many facets of the planning process were included in the desk audit, this report focuses on areas with notable findings. All subject areas not included in the report were found to be compliant with federal regulations.

3.2 Documents Reviewed

A number of documents, agreements, and materials (e.g. COG websites, project solicitation materials) were consulted and assessed for conformity with federal regulations. The following list summarizes a few of the key MPO documents that were reviewed and considered during this certification review.

- MPO Agreements, By-Laws, MPO Designation, MOUs
- FY 2020-2021 Unified Planning Work Programs
- MPO MTPs, 2019-2045
- MPO FFY 2021-2024 TIPs and Self-Certifications
- Public Participation Guidelines (SCRCOG January 2021)
- Public Participation Plan (RiverCOG, August 2020)
- Title VI Policy and Documents (SCRCOG, RiverCOG)
- Language Assistance Plan (SCRCOG November 2017)
- SCRCOG Congestion Management Process Report, June 2018



- SCRCOG Bicycle and Pedestrian Plan Update, June 2017
- South Central Region Multi-Jurisdiction Hazard Mitigation Plan Update (May 2018, Addendum – September 2018)
- SCRCOG and RiverCOG Studies (Corridor and Transit)

4.0 PROGRAM REVIEW

4.1 MPO Structure and Cooperation

4.1.1 Regulatory Basis

23 U.S.C. 134(d) and 23 CFR 450.314(a) state the MPO, the State, and the public transportation operator shall cooperatively determine their mutual responsibilities in carrying out the metropolitan transportation planning process. These responsibilities shall be clearly identified in written agreements among the MPO, the State, and the public transportation operator serving the MPA.

As it relates to MPO composition, according to 23 CFR 450.310(d), the MPO Policy Board shall consist of (a) local elected officials, (b) officials of public agencies that administer or operate major modes of transportation within the metropolitan area, including representation by providers of public transportation, (c) appropriate State transportation officials.

4.1.2 Current Status

SCRCOG

The SCRCOG board, which serves as the MPO Policy Board, meets regularly each month and acts on MPO items. SCRCOG passed a resolution in January 2017 to include a transit representative on the Board; the transit representative was named as a current chief elected official, who also serves on a transit board representing the region. SCRCOG bylaws were last amended in October 2010.

Roles and responsibilities of the SCRCOG MPO, CTDOT, and the public transportation operators are defined in the Prospectus, a written document within the MPO's approved Unified Planning Work Program (UPWP) for FY 2020 and FY2021 which outlines the Federally required elements of transportation planning between the parties. SCRCOG also has a 1996 Memorandum of Understanding (MOU) with CTDOT and the Milford and Meriden Transit Districts, but it does not appear to reflect current practices. It is unclear if this transit MOU has been superseded by another agreement.



The region also has an active Transportation Committee and Transportation Technical Committee, which are discussed briefly in the introduction of the UPWP and listed on the SCRCOG website. These committees meet monthly to make recommendations to SCRCOG on transportation matters. The federal team was not able to identify where the membership, roles, and responsibilities of these committees are formally established as they are not identified in the Prospectus, MOUs, or bylaws.

RiverCOG

The RiverCOG board is designated as the MPO Policy Board and meets regularly each month, acting on MPO items. In addition to the Chief Elected Official of each member town, RiverCOG's MPO has representatives for Estuary Transit District and Middletown Area Transit, a State Transportation Official, and an appointed member of the Middlesex County Chamber of Commerce on their board. Bylaws were last amended in December 2014.

Roles and responsibilities of the RiverCOG MPO, CTDOT, and the public transportation operators are defined in the Prospectus, a written document within the MPO's approved Unified Planning Work Program (UPWP) for FY 2020 and FY2021 which outlines the Federally required elements of transportation planning between the parties.

4.1.3 Findings

SCRCOG

Per 23 CFR 450.310(d) the MPO, in addition to Local Elected Officials and Officials of public agencies that administer or operate major modes of transportation including public transportation providers, shall consist of appropriate state officials. No current SCRCOG documents, including MOUs or bylaws, define the MPO composition or decision-making process; however, the 2017 resolution Concerning Transit Representation on the SCRCOG Board generally outlines the member framework specifically for addressing the requirement to have a representative of public transit providers. The process by which a new transit representative is named if that individually named representative leaves their office is not clear. The MPO structure does not have a state transportation official on the board.

Corrective Action: SCRCOG and CTDOT should work together to formally include a state transportation official on the MPO Board, to comply with 23 CFR 450.310(d), no later than December 31, 2021. FHWA and FTA can provide guidance as needed.

Recommendation: The MPO should consider amending their bylaws or developing other documentation to better clarify roles, responsibilities and the MPO voting structure as well as defining the Transportation and Transportation Technical Committees.



Recommendation: In cooperation with the region’s transit providers, SCRCOG should more formally define the process by which a transit representative to the MPO board is selected, as well as an option to assign an alternate. This will ensure a continuous voice for transit even as board members change over time. The MPO may consider including this in updated bylaws.

RiverCOG

RiverCOG is compliant with federal regulations and the MPO board includes Local Elected Officials, Officials of public agencies that administer or operate major modes of transportation including public transportation providers, and an appropriate state official. Documentation of MPO membership and voting structure was not found.

Recommendation: RiverCOG and CTDOT should work together to ensure the state transportation official to the MPO board is well-defined and engaged. FHWA and FTA can provide guidance as needed.

Recommendation: The MPO should consider amending their bylaws or developing other documentation to better clarify roles, responsibilities, and the MPO voting structure.

4.2 TMA Coordination

4.2.1 Regulatory

In accordance with 23 U.S.C. 134 and 23 CFR 450, MPOs must carry out a planning process that is "continuing, cooperative and comprehensive" (3C). This includes establishing agreements to address the responsibilities and situations arising from there being more than one MPO in a metropolitan area.

More specifically, 23 CFR 450.314(e) states:

“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, particularly in cases in which a proposed transportation investment extends across the boundaries of more than one MPA. If any part of the urbanized area is a nonattainment or maintenance area, the agreement also shall include State and local air quality agencies. The metropolitan transportation planning processes for affected MPOs should, to the maximum extent possible, reflect coordinated data collection, analysis, and planning assumptions across the MPAs.



Alternatively, a single metropolitan transportation plan and/or TIP for the entire urbanized area may be developed jointly by the MPOs in cooperation with their respective planning partners. Coordination efforts and outcomes shall be documented in subsequent transmittals of the UPWP and other planning products, including the metropolitan transportation plan and TIP, to the State(s), the FHWA, and the FTA.”

In 2014, U.S. DOT outlined three Planning Emphasis Areas. These are not regulations, but rather topic areas that MPOs and State DOTs are encouraged to focus on when conducting their planning processes and developing their planning work programs. One of these Emphasis Areas is Models of Regional Planning Cooperation, which reads:

“Promote cooperation across MPO boundaries and across State boundaries where appropriate to ensure a regional approach to transportation planning. This is particularly important where more than one MPO or State serves an urbanized area or adjacent urbanized areas. The cooperation could occur through the metropolitan planning agreements that identify how the planning process and planning products will be coordinated, through the development of joint planning products, and/or by other locally determined means.”

4.2.2 Current Status

SCRCOG and RiverCOG have a good history of collaboratively working together within the TMA. A few examples include the MPOs involvement on joint planning initiatives (e.g. shared mobility manager, preparing the Congestion Management Process), collaborating on regional committees (e.g. DEMHS Region 2), and regular COG staff conversations and interactions. The COGs have also established good working relationships with transit partners and CTDOT officials.

The Memorandum of Understanding (MOU) within the New Haven TMA, between SCRCOG, RiverCOG, CTDOT, and transit providers has not been advanced and existing MOUs continue to be outdated, and in some cases, obsolete, due to MPO redesignations. A 2002 MOU between SCRCOG, the Central Naugatuck Valley COG, and two regional planning agencies that no longer exist covered distribution of planning funds, STP and 5307 funds and the responsibilities of each MPO within the New Haven urbanized area. The MOU is outdated, includes MPOs and regional planning agencies which no longer exist, and does not address current federal requirements.

Beyond the New Haven urbanized area, both RiverCOG and SCRCOG are also involved in the Metropolitan Area Planning (MAP) Forum which brings together MPOs from throughout the greater New York City area to work on shared issues. Both MPOs have found this coordination to be helpful for their regions.



4.2.3 Findings

Although a proven record of coordination exists within the New Haven TMA, a formal MOU has not been executed. CTDOT has been advancing structured TMA MOUs as it relates to Transportation Planning and Funding in other areas of Connecticut. Parties of the agreement include the MPOs, transit providers and CTDOT representatives for the given TMA.

Corrective Action: An MOU must be developed describing how transportation planning efforts are coordinated between agencies within the New Haven TMA, in accordance with 23 CFR 450.314(e) regulation. The TMA MOU must be executed by all parties on or before December 31, 2021.

4.3 Financial Planning

4.3.1 Regulatory Basis

The MTP 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” and demonstrates fiscal constraint for these documents. Estimates of funds available for use in the financial plan must be developed cooperatively by the MPO, public transportation operator(s), and the State (23 CFR 450.314). This cooperative process must be outlined in a written agreement that includes specific provisions for developing and sharing information related to the development of financial plans that support the metropolitan transportation plan (23 CFR 450.314).” Additional requirements for financial plans are contained in 23 CFR 450.324(f)(11) for the Metropolitan Transportation Plan (MTP) and 23 CFR 450.326(e–k), for the Transportation Improvement Program (TIP).

4.3.2 Current Status

CTDOT

The Statewide Transportation Improvement Program (STIP) for FFY 2021-2024 was conditionally approved on January 26, 2021, subject to CTDOT demonstrating financial constraint and developing a strategy to improve the consistency, accuracy, and transparency of its fiscal constraint no later than March 31, 2021. Understanding that CTDOT assists MPOs in maintaining fiscal constraint and regularly transmits financial information to MPOs through the MTP and TIP processes, this federal planning finding directly impacts MPO fiscal constraint.



SCRCOG

The TIP, covering FFY 2021-2024, was adopted in September 2020. Included in the TIP is a narrative that references SCRCOG is dependent on CTDOT to provide estimates of federal funds available statewide, and for assuming that a sufficient portion of those funds are allocated to SCRCOG to cover the cost of their program of projects.

As it relates to the MTP, CTDOT provides an estimate of anticipated federal funds over the 20-25 year time frame of the plan for the highway and transit programs. Additional fiscal / financial planning coordination is outlined in the UPWP Prospectus.

RiverCOG

The TIP, covering FFY 2021-2024, was adopted in October 2020. Included in the TIP is a financial plan narrative that references the CTDOT, in cooperation with the MPO's, developed twenty-five year revenue estimates under the MTP that serve as the basis for TIP development and fiscal constraint.

As it relates to the MTP, CTDOT provides an estimate of anticipated federal funds over the 20-25 year time frame of the plan for the highway and transit programs. Additional fiscal / financial planning coordination is outlined in the UPWP Prospectus.

4.3.3 Findings

CTDOT

In January 2021, FHWA and FTA conditionally approved the FFY 2021-2024 STIP subject to the CTDOT demonstrating fiscal constraint. CTDOT reviewed their existing practices and, in April 2021, issued a list of steps that will be taken to ensure the STIP is fiscally constrained. These steps generally include:

- The development of a working STIP that manages CTDOT Capital Services amendments and actions to evaluate fiscal constraint prior to asking MPOs to take TIP actions
- CTDOT oversight of TIP amendments on Transportation Committee and MPO agendas
- Enhanced CTDOT communication with FHWA and FTA
- Quarterly updates of authorization levels and funding categories to evaluate constraint against
- Enhancements to the STIP narrative



- CTDOT coordination with MPOs related to TIP actions necessary for Transit District grant application projects
- Meetings between CTDOT and FHWA/FTA to monitor the implementation of fiscal constraint steps outlined above

FHWA and FTA will be meeting with the CTDOT STIP development team in early June 2021 to further discuss these steps and assess if these actions have assisted in demonstrating fiscal constraint. The below corrective action remains open.

Corrective Action (from January 26, 2021 STIP Conditional Approval): CTDOT must provide a clear demonstration of financial constraint, based on reasonable financial planning practices. The financial constraint should clearly show that the funds programmed in the STIP do not exceed the funds available or expected to be available for each year. This demonstration of constraint must be maintained with each STIP action and submitted with each STIP amendment requesting federal approval.

SCRCOG

Fiscal constraint is a tool to establish a budget, prioritize within that budget, and then illustrate that the adopted MTP and TIP are realistic. Although CTDOT initiates and provides MPOs with financial data, enhanced collaboration between all parties, including transit providers, would benefit the financial planning process.

Recommendation: The federal team understands the collaboration between CTDOT and MPOs as it relates to providing financial projections for the MTP. It is recommended that the MPO takes a more active role in the development of the financial plan and better document its coordination with CTDOT and local transit providers. The MPO should ensure these projections are analyzed and summarized in a way that demonstrates fiscal constraint for the MTP.

Recommendation: The TIP should be improved to include a clear comparison of anticipated revenues and programmed expenditures demonstrating financial constraint. Continued coordination with CTDOT will ensure reasonable funding program estimates. The TIP document should include a summary demonstrating financial constraint by year by funding source.

Available FHWA / FTA Resources:

- National Transit Institute (NTI) 'Financial Planning in Transportation' course



RiverCOG

The MTP offers a Financial Plan narrative that describes how the MTP will be implemented through System Preservation, System Improvement and Major projects however enhancements to the financial plan could be a benefit to regional stakeholders throughout project planning.

The Financial Plan narrative in the TIP appears to include the anticipated Statewide Federal sources of funding as the available funding for the Region. It is not clear if the estimated amount of anticipated funding is for the state of Connecticut or for the Region. Therefore, it is difficult to determine if the TIP is fiscally constrained to the regions anticipated funding or the entire states anticipated funding.

Recommendation: It is recommended that the MPO take a more active role in the development of the financial plan and better document its coordination with CTDOT and local transit providers in the process. The MPO should clearly demonstrate financial constraint in the MTP based on reasonably anticipated funding for the region.

Recommendation: The TIP should be improved to include a clear comparison of anticipated revenues and programmed expenditures demonstrating financial constraint. Continued coordination with CTDOT will ensure reasonable funding program estimates. The TIP document should include a summary demonstrating financial constraint by year by funding source.

Available FHWA / FTA Resources:

- National Transit Institute (NTI) 'Financial Planning in Transportation' course

4.4 Metropolitan Transportation Plan

4.4.1 Regulatory Basis

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

The MTP is required to provide a continuing, cooperative, and comprehensive multimodal transportation planning process. The plan needs to consider all applicable issues related to the



transportation systems development, land use, employment, economic development, natural environment, and housing and community development.

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

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

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

4.4.2 Current Status

SCRCOG

The South Central Regional Metropolitan Transportation Plan (covering the years 2019-2045) was completed in April 2019.

RiverCOG

The Lower Connecticut River Valley Regional Metropolitan Transportation Plan (covering the years 2019-2045) was completed in March 2019.

4.4.3 Findings

SCRCOG

The MTP provides a comprehensive multi-modal summary of regional assets, short- and long-range strategies, and actions that facilitate the efficient movement of people and goods



however enhancements to the financial plan and performance target sections could be a benefit to regional stakeholders throughout project planning.

Recommendations are included in Financial Planning, Transit Planning and Performance Management sections.

RiverCOG

The MTP includes a variety of multimodal short and long-range projects and strategies, including bicycle and pedestrian walkway facilities, transportation alternatives, and associated transit improvements. Enhancements to the financial plan and performance target sections could be a benefit to regional stakeholders throughout project planning.

Recommendations are included in Financial Planning, Transit Planning and Performance Management sections.

4.5 Transit Planning

4.5.1 Regulatory Basis

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

4.5.2 Current Status

SCRCOG

The SCRCOG region has a diverse transit network and offers various modes of transportation. The transit providers that serve the region include *CTtransit* New Haven Division, the Greater New Haven Transit District (GNHTD), Milford Transit District (MTD), *CTrides*, the Shoreline East Railroad, and the *CTrail* – the Hartford Line. The MPO's transit planning efforts have been supportive to the region's transit providers and transit planning initiatives. The Move New Haven Transit Mobility study was completed in 2019 to develop and evaluate alternative actions that will improve the Greater New Haven transit system. The MPO is also prioritizing service enhancements and expansion at many of the region's rail stations. Incorporating access connections to bicycle and pedestrian facilities with the current enhancements and expansion should be an important aspect to the planning process. The current MTP does a good job with



identifying all the transit service providers in the MPO, however, there is little explanation that demonstrates the collaboration and coordination between the MPO and transit agencies.

SCRCOG, in collaboration with the RiverCOG, continues to support a Mobility Management Program contracted through the Kennedy Center. The program provides a one-stop resource that identifies the best transportation options for the elderly and individuals with disabilities. The program serves the 32 municipalities throughout South Central Connecticut and is a vital component in eliminating barriers to service and filling gaps for these individuals. The program was derived from the Locally Coordinated Public Transit Human Service Transportation Plan (LOCHSTP), which was originally developed as a statewide initiative in 2007 and later amended in 2009.

RiverCOG

The transit providers that serve the MPO region include Middletown Transit District (MTD), Estuary Transit District (ETD) and the Shoreline East Railroad. The MPO recently conducted a Transit Study in the summer of 2020, which examined integrating the region's two bus providers, MTD and ETD. The study assessed the transit service and performance for the 17 communities that are currently served by the two transit agencies. The study also evaluated the condition and future needs for facilities and the restructuring of governance for the member communities within the service area. The MPO conducted several outreach activities to identify the service priorities for stakeholders from the Spring 2019 through the Summer 2020. The outreach methods included the circulation of on board surveys, stakeholder's interviews, a project website, pop-up events, cable TV broadcasts and social media. The MPO identified three objectives derived from the study to improve the current transit system which include achieving increased service efficiency, implementing the proposed merger with MTD and ETD, and improving the regional transit service.

RiverCOG also continues to partner with SCRCOG to implement the Mobility Management Program for South Central Connecticut. As discussed in the current status for SCRCOG, the current LOCHSTP is significantly outdated.

Overall, the MPO demonstrates a strong partnership with its transit providers and good coordination. The most recent MTP does a good job describing the overall transit network, as well as the regions motivation and action to integrate the networks modes. The Transit Planning section in the MTP also described how the region's transit providers worked with CTDOT, but the document should also reiterate the collaboration between RiverCOG and its transit providers.



4.5.3 Findings

Recommendation: An updated LOCHSTP should be developed in a collaborative process with seniors; individuals with disabilities; representatives of public, private, nonprofit transportation and human service providers; and other members of the public. The designated recipient is not directly responsible for developing the coordinated plan but is responsible for ensuring that the plan from which a selected project was included is developed in compliance with the statutory requirements. An agency or organization other than the designated recipient may take the lead in developing the coordinated plan. As of April 2021, CTDOT has committed to developing an updated LOCHSTP by the end of the calendar year. The State and MPOs should cooperatively ensure this process is completed.

SCRCOG

The region has an effective Mobility Management Program that identifies service gaps for the elderly and individuals with disabilities. One issue that continues to be of concern in the region and across the State of Connecticut is the lack of progress updating the LOCHSTP. As noted in the findings of the 2017 certification review for New Haven; at a minimum, the coordinated plan should follow the update cycles for Metropolitan Transportation Plans (MTPs). This should be at least every four years in air quality nonattainment and maintenance areas and five years in air quality attainment areas. FTA circular 9070.1G for Enhanced Mobility for Seniors and Individuals with Disabilities also states that the designated recipient must certify that all projects funded through the section 5310 program are included in a locally developed, coordinated public transit-human service transportation plan.

Recommendation: In the next MTP update, the MPO should provide a narrative to document its coordination and collaborative efforts with local transit providers. The MPO should detail its working relationships and continue to demonstrate how the MPO supports transit planning for the wide range of transit services in the region.

RiverCOG

The region has an effective Mobility Management Program that identifies service gaps for the elderly and individuals with disabilities. One issue that continues to be of concern in the region and across the State of Connecticut is the lack of progress updating the LOCHSTP. As noted in the findings of the 2017 certification review for New Haven; at a minimum, the coordinated plan should follow the update cycles for metropolitan transportation plans (MTPs). This should be at least every four years in air quality nonattainment and maintenance areas and five years in air quality attainment areas. FTA circular 9070.1G for Enhanced Mobility for Seniors and Individuals with Disabilities also states that the designated recipient must certify that all



projects funded through the section 5310 program are included in a locally developed, coordinated public transit-human service transportation plan.

Commendation: The federal team commends the MPO for the work on the transit system study that identified the benefits of integrating the region’s two bus providers and working to achieve the goal for improving and more effectively delivering transit service. As the merger progresses the MPO should continue to be intimately involved in executing the recommendations from the Lower Connecticut River Valley Regional Bus Integration Study.

Recommendation: It is recommended that the MPO provide better documentation of its collaborative efforts with transit providers.

4.6 Transportation Improvement Program

4.6.1 Regulatory Basis

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

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

4.6.2 Current Status

SCRCOG

The current SCRCOG TIP is the FFY 2021-2024 TIP, adopted in September 2020.



SCRCOG also publishes an annual list of projects for which Federal funds have been obligated in the preceding year and posts it on-line.

Project selection procedures are generally based on the purpose and need of the given funding source / solicitation with a consideration to the goals outlined in the MTP.

RiverCOG

The current RiverCOG TIP is the FFY 2021-2024 TIP, adopted in October 2020.

RiverCOG shares an annual list of projects for which Federal funds have been obligated in the preceding year with the MPO however this is not made available on-line.

RiverCOG has formal project selection criteria for the Congestion Mitigation and Air Quality (CMAQ), Transportation Alternatives (TA) and Local Transportation Capital Improvement Program (LOT/CIP) (state funded) programs.

4.6.3 Findings

SCRCOG

SCRCOG transparently provides historic TIP information in addition to enhanced project descriptions and the MPO Board considers both actions and amendments to the TIP when changes are requested. A visual TIP representation has not been developed.

For several years, in an effort to manage their TIP, SCRCOG uses an access database (TELUS, developed out of NJIT). SCRCOG expressed concerns that the future eSTIP initiative could impact their current process and add time to the TIP approval process.

SCRCOG meets with CTDOT annually to discuss programming, providing input on the DOT suggested list and SCRCOG expressed this process has worked well to date. Regional project solicitations are made for specific programs (e.g. CMAQ, TAP) and selections are based on purpose and connectivity, ensuring equity among member towns.

Enhancements to better illustrate fiscal constraint could benefit regional stakeholders and specific recommendations are included in the financial planning section of this report.

Commendation: SCRCOG is commended for their TIP action and amendment process which transparently shares detailed information on projects and tracks financial histories, assisting MPO officials and the public in making sound decisions.



Recommendation: SCRCOG should coordinate with the CTDOT to understand the eSTIP platform that is under development and how it may or may not be compatible with the region's existing TIP database. Early coordination could identify opportunities to make the two systems more harmonious.

Recommendation: As SCRCOG considers the future of the TIP management system and collaboration with the eSTIP initiative, it is recommended that the feasibility of creating an on-line, visual TIP be explored in partnership with CTDOT. This visual TIP could provide location-based TIP projects along with project descriptions, histories and photos.

RiverCOG

The RiverCOG MPO regularly entertains TIP amendments, summarizing project additions, deletions or change in the meeting documents and during MPO meetings. Other than the meeting minutes, these changes are not formally documented following MPO approval. RiverCOG expressed an interest in coordinating with CTDOT on a state folder system.

The current, newly adopted TIP is not posted on-line, rather a copy of the draft FFY 2021-2024 TIP (dated August 13, 2020) is on-line.

RiverCOG has discussed a potential mapping tool with CTDOT, as a statewide effort and CTDOT is looking into this. A visual TIP representation has not been developed by RiverCOG however they have developed an on-line mapping tool, through the POCD effort, that is expandable.

Enhancements to better illustrate fiscal constraint could benefit regional stakeholders and specific recommendations are included in the financial planning section of this report.

Recommendation: The MPO should ensure the current TIP, including any adopted amendments, can be easily found online. Although not ideal, a PDF of the amendments can be posted to the RiverCOG website in the short term, until an enhanced process can be developed.

Recommendation: RiverCOG should make the list of federally obligated projects available on-line, to enhance transparency and comply with 23 CFR 450.334

Recommendation: RiverCOG should continue to collaborate with CTDOT as it relates to a potential statewide mapping tool and, if it does not appear to be feasible, RiverCOG should consider the expansion of the on-line tool developed under the POCD effort to enhance the regional TIP.



4.7 Public Participation

4.7.1 Regulatory Basis

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

Specific requirements include giving adequate and timely notice of opportunities to participate in or comment on transportation issues and processes, employing visualization techniques to describe metropolitan transportation plans and TIPs, making public information readily available in electronically accessible formats and means such as the world wide web, holding public meetings at convenient and accessible locations and times, demonstrating explicit consideration and response to public input, and periodically reviewing the effectiveness of the participation plan.

4.7.2 Current Status

SCRCOG

SCRCOG completed a minor update of their Public Participation Guidelines for Transportation Planning in January 2021. A significant update of the document has not been completed recently.

Public involvement associated with studies is generally facilitated by consultants and consists of traditional approaches, such as public meetings or information tables at community events, to obtain input. SCRCOG transitioned to an on-line public meeting platform for the Route 146 Corridor Study in Branford and Guilford during 2020, in response to the pandemic, and expects to consider this option for future studies.

In 2020, SCRCOG pivoted to virtual meetings for its standing boards and committees, as a result of the pandemic, and have realized increased attendance at meetings.

RiverCOG

RiverCOG endorsed a revision to their Public Participation Plan (PPP) on August 28, 2020 to include new processes used in response to the pandemic. The revised plan was coordinated



with Middletown Area Transit and Estuary Transit District and a 45-day comment period was extended to the public before adoption. During the virtual review RiverCOG commented that they may to do an overhaul of the PPP in the future which will include a meeting format that has a combination of in-person and virtual options (hybrid meetings) as well as Title VI updates.

RiverCOG provides opportunities for the public to formally comment and provide input through their website. They also use social media, maintaining a Facebook page. While RiverCOG has limited followers on social media, they have utilized sharing through the elected officials' social media accounts as a way of getting the word out more broadly.

Corridor studies include multiple public outreach approaches, including such events as 'pop-ups', booths at community events, and using technology such as ipads for surveys. Business cards were also prepared for the Route 66 and Route 81 corridor studies, identifying the corridor study website and contact information.

RiverCOG is in the process of developing an ArcGIS mapping tool that can be used in the analysis and evaluation of transportation plans and programs and assist in guiding their outreach activities.

4.7.3 Findings

SCRCOG

Recommendation: SCRCOG is encouraged to research and consider new public involvement tools that may enhance current processes. Additionally, the region should consider the needs and concerns from groups that are traditionally underserved and underrepresented by the existing transportation and assess how those groups can be better engaged in transportation planning.

Available FHWA / FTA Resources:

- Broward MPO (Florida) Public Participation: <https://browardmpo.org/core-products/public-participation-plan-ppp>
- The Innovative MPO - Smart Planning, Strong Communities <https://t4america.org/wp-content/uploads/2014/12/The-Innovative-MPO.pdf>
- Public Involvement Techniques for Transportation Decisionmaking (FHWA) https://www.fhwa.dot.gov/planning/public_involvement/publications/pi_techniques/fhwahep15044.pdf
- Case studies and examples: https://www.fhwa.dot.gov/planning/public_involvement/



RiverCOG

Commendation: RiverCOG is commended for their multi-faced approach to engaging the public throughout the transportation planning process and engaging public transit agencies during the update of the PPP.

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

4.8.1 Regulatory Basis

Title VI of the Civil Rights Act of 1964, prohibits discrimination based upon race, color, and national origin. Specifically, 42 U.S.C. 2000d states that “No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.” In addition to Title VI, there are other Nondiscrimination statutes that afford legal protection. These statutes include the following: Section 162 (a) of the Federal-Aid Highway Act of 1973 (23 U.S.C. 324), Age Discrimination Act of 1975, and Section 504 of the Rehabilitation Act of 1973/Americans with Disabilities Act (ADA) of 1990. ADA specifies that programs and activities funded with Federal dollars are prohibited from discrimination based on disability.

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

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

Under the ADA (28 CFR § 35.105) and Section 504 (49 CFR § 27.11), public entities must ensure that all programs, activities, and services are examined to identify barriers to access for persons with disabilities. Every State and municipality is required by Section 504 and by the ADA, to have completed a self-evaluation and an ADA transition plan. The self-evaluation is an inventory of an entity’s facilities (e.g. sidewalks, curb ramps, detectable warnings) that identifies barriers in policies (e.g., public meetings in inaccessible locations), programs (e.g.,



sidewalks and curb ramps— both considered to be “programs”—that are inaccessible to persons with disabilities, or, missing where they should have been constructed) and other activities and services that prevent access for persons with disabilities.

An ADA transition plan is the document that identifies the steps necessary to complete the changes identified in the entity’s self-evaluation to make its programs, activities, and services accessible; it describes in detail the actions the public entity will take to make facilities accessible and a prioritized schedule for making the improvements. All public entities with 50 or more employees (agency-wide) are required to develop a transition plan. Whereas agencies with less than 50 employees must develop a “Program Access Plan,” that describes how it will address non-compliant facilities.

4.8.2 Current Status

SCRCOG

Title VI Policy - The Title VI Complaint Process/Procedures discusses the process to file a Title VI Complaint. The Form does not include age as a protected class. The Form should be retitled as a “Title VI/Non-Discrimination Compliant Form” and include the relevant nondiscrimination classes including, race, age, color, disability, national origin and sex. Also, any person or any specific class of persons, by themselves or by a representative, that believe they have been subjected to discrimination prohibited by Title VI of the Civil Rights Act of 1964 and related statutes, Section 504 of the Rehabilitation Act of 1973, or Title II of the Americans with Disabilities Act of 1990 may file a complaint.

ADA - Under the ADA (28 CFR § 35.105) and Section 504 (49 CFR § 27.11), public entities must ensure that all programs, activities, and services are examined to identify barriers to access for persons with disabilities. Every State and municipality is required by Section 504 and by the ADA, to have completed a self-evaluation and an ADA transition plan. The self-evaluation is an inventory of an entity’s facilities (e.g. sidewalks, curb ramps, detectable warnings) that identifies barriers in policies (e.g., public meetings in inaccessible locations), programs (e.g., sidewalks and curb ramps— both considered to be “programs”—that are inaccessible to persons with disabilities, or, missing where they should have been constructed) and other activities and services that prevent access for persons with disabilities.

The MPO has stated that all their meetings are held in ADA accessible facilities that includes accessible bathrooms, sidewalks and curb ramps.

Environmental Justice - The Executive Order 12898 of February 11, 1994 focuses on recipients of federal financial assistance to address Environmental Justice in minority populations and low-income populations. The Review Team understands that there are projects programmed in



the MPO's TIP and MTP that were selected by CTDOT, and not by the MPO. However, for projects selected by the MPO, an EJ analysis to examine the burdens and benefits of the transportation projects was not conducted in either the TIP or MTP.

RiverCOG

Title VI - The Title VI Policy Statement, Title VI Organization Chart and the LEP Four Factor Analysis and Language Assistance Plan were reviewed. The Policy Statement lists the protections included under Title VI, race, color and national origin. It also lists other statutory protections, sex, age and disability. The LEP analysis is thorough and comprehensive. The MPO's complaint process is shown in the Organization Chart (Title VI), and it is consistent with FHWA and FTA procedures.

ADA - Under the ADA (28 CFR § 35.105) and Section 504 (49 CFR § 27.11), public entities must ensure that all programs, activities, and services are examined to identify barriers to access for persons with disabilities. Every State and municipality is required by Section 504 and by the ADA, to have completed a self-evaluation and an ADA transition plan. The self-evaluation is an inventory of an entity's facilities (e.g. sidewalks, curb ramps, detectable warnings) that identifies barriers in policies (e.g., public meetings in inaccessible locations), programs (e.g., sidewalks and curb ramps— both considered to be "programs"—that are inaccessible to persons with disabilities, or, missing where they should have been constructed) and other activities and services that prevent access for persons with disabilities. For municipalities that have less than 50 staff, and Public Access Plan is required.

EJ - The MPO considers EJ in their planning process. For transit, the Fixed route transit is mapped in relation to minority and low income census tracts in the transit district's Title VI reports which identifies minority communities, and inventories transit service and travel patterns. It also analyses and compares level of service and quality of service in the minority and low income tracts versus the non-minority and low income tracts.

The MPO considers EJ during the public participation process that involves minority and low income populations in decision making during early stages of the planning and project development. The MPO states that the majority of EJ studies are done on a project level basis due to the small minority and low income population found in the region. Special studies, such as corridor studies have an EJ representative on the advisory committee and neighborhood organizations are consulted. In addition, EJ organizations are contacted on a project level basis such as for meetings relating to STP projects. Also, outreach efforts for the TIP and similar documents include publishing notices in local and Spanish newspapers and sending information to those on the special EJ mailing list.



4.8.3 Findings

SCRCOG

Title VI – Recommendation: The MPO should develop a new complaint form that will accurately capture the nondiscrimination statutes and protections. The new complaint form should be limited to race, age, color, disability, national origin and sex. In addition, all complaints filed directly with the MPO should be forwarded and processed by CTDOT in accordance with the complaint procedures required under 23 CFR 200.9(b)(3). Copies of these complaints should be sent to FHWA and FTA.

ADA Recommendation: The MPO is recommended to work with CTDOT to educate municipalities on their responsibilities under ADA and Section 504 to ensure that all programs, activities, and services under the municipality’s jurisdiction are examined to identify barriers to access for persons with disabilities. With CTDOT’s assistance, an ADA Transition Plan or Program Access Plan should be developed which would describe the steps to ensure the municipality’s program areas are accessible to persons with disabilities.

ADA Recommendation: The MPO should assess how it communicates with disabled persons. Alternative formats such as TTY (Teletypewriter) and TDD (Telecommunication Device for the Deaf) or relay services that will allow hearing-impaired individuals to communicate through the telephone to receive information from the MPO should be considered. As discussed at the certification review, CTDOT is willing to provide technical assistance on the alternative formats to fully communicate with people with disabilities.

EJ Recommendation: To be consistent with the Executive Order on EJ, the MPO will need to conduct a benefit and burden analysis on projects selected in the TIP and MTP. The data collection and analysis should be consistent in its consideration of all groups under Title VI and not limited to minority individuals. Title VI protected classes include persons of any race, color and national origin. The MPO staff should become familiar with the requirements of the EJ Executive order and associated guidance. Staff is recommended to take the virtual NHI EJ class, course number FHWA-NHI-142074 to under the basics of EJ and document the analysis in the TIP and LRTP. The Review Team is available to provide technical assistance as needed.

RiverCOG

Title VI: The MPO’s planning process regarding this topic area is consistent with the applicable federal requirements.

ADA Recommendation: The MPO is recommended to work with CTDOT to educate municipalities on their responsibilities under ADA and Section 504 to ensure that all programs,



activities, and services under the municipality's jurisdiction are examined to identify barriers to access for persons with disabilities. With CTDOT's assistance, an ADA Transition Plan or Program Access Plan should be developed which would describe the steps to ensure the municipality's program areas accessible to persons with disabilities.

EJ: The MPO's planning process regarding this topic area is consistent with the applicable federal requirements.

4.9 Freight Planning

4.9.1 Regulatory Basis

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

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

4.9.2 Current Status

SCRCOG

There is a wide variety of freight modes in operation in the region. The MPO is supporting the CTDOT in their production of a state freight plan and has compiled a list of freight providers in the region. The region reports involvement with the MAP Forum and NYMTC based on the heavy truck freight traffic generated in NY and NJ that travels I-95 and with the New Haven Port Authority. The region stays up to beat with all major national freight news. The MPO has worked on local freight infrastructure projects and rail issues. The region coordinates well with surrounding MPOs and has discussions about freight in their region with them. The MPO has sponsored a freight cargo study in 2014 for Tweed New Haven Airport, 2018 Freight Access study in New Haven Port and truck studies along I-95 in the past to inform their transportation planning activities.



RiverCOG

The MPO reported that, while freight concerns touch many other elements of their planning processes, the nature of freight in the region is pass-through. A new FedEx and Amazon facility has affected some of their local areas. The region reports involvement with the MAP Forum and NYMTC based on the heavy truck freight traffic generated in NY and NJ that travels I-95. The region stays up to beat with all major national freight news. Many elements of freight traffic occur in the region including truck, marine and pipeline. The region foresees involvement with the state Port Authority in the future. Results of the Valley Railroad study were useful for understanding that future freight movements will not be possible via this rail line. The rural nature of much of the MPO implies the need for farm freight movements and they have been educating the public on how freight can be a “good neighbor” to residential areas. The region is home to a variety of freight modes and various freight-related issues that are both common among the State’s regions and unique to this MPO. The region coordinates well with surrounding MPOs and has discussions about freight in their region with them. The MPO is assisting the state with their freight plan and collecting important region-specific data at the same time.

4.9.3 Findings

SCRCOG

The MPO is in compliance with federal regulations for this topic area.

RiverCOG

The MPO is in compliance with federal regulations for this topic area.

4.10 Transportation Safety

4.10.1 Regulatory Basis

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



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

23 CFR 490.209 and 23 CFR 450.306 require MPOs to establish targets annually for each highway safety performance measure in coordination with the relevant State(s) to ensure consistency to the maximum extent practicable. MPOs are to establish performance targets not later than 180 days after the date on which the relevant State establishes their performance targets.

4.10.2 Current Status

SCRCOG

SCRCOG noted that CTDOT completed the development of a Regional Transportation Safety Plan (RTSP) for the SCRCOG. SCRCOG indicated that the RTSP was not considered to be a valuable resource for a number of reasons including lack of historical context on what solutions have been tried, and inconsistent coordination with Town officials during development of the plan. Also, the SCRCOG noted that the RTSP may cause challenges due to potential concerns with liability ramifications from the region identifying safety concerns. Further, the SCRCOG expressed concerns that the RTSP is not supported by funding for implementation of any identified safety improvements.

SCRCOG commented that safety is considered during their project selection processes.

The MPO also works with the T2 Center Safety Circuit Rider.

RiverCOG

The CTDOT is developing a Regional Transportation Safety Plan (RTSP) for each of the COGs within the state, the RiverCOG RTSP is underway and expected to be completed in 2021. RiverCOG is assessing how the RTSP may be used and expressed concerns with a performance-based approach due to legal ramifications from publishing such information.

RiverCOG is using the UConn Crash Data Repository to locate and analyze potential safety issues within their region. The region has also worked with their towns on Road Safety Audits (RSAs) and advancing projects through the CTDOT's Community Connectivity Grant program. The MPO also collaborates with the T2Center Safety Circuit Rider.



RiverCOG has recently completed two corridor studies (Route 66 and Route 81) which include assessments and recommendations to address safety concerns along these corridors. RiverCOG and CTDOT are working on ideas to incorporate a pedestrian walkway along the Haddam / East Haddam Swing Bridge to address pedestrian safety.

RiverCOG has project selection criteria for their Transportation Alternative Program, the CMAQ Program, and the State funded LOTCIP program. The selection criteria vary by program, including safety, cost effectiveness, and project readiness to name a few, and is used by the region to prioritize and select projects.

4.10.3 Findings

SCRCOG

Recommendation: SCRCOG should work with the Safety Office at the CTDOT to obtain guidance on how the RTSP may be used to obtain funding to implement specific safety improvements identified within the RTSP. These discussions should also address the concerns SCRCOG raised with respect to the liability, if any, that exists with the publication of the RTSPs.

RiverCOG

Recommendation: RiverCOG should work with the Safety Office at the CTDOT to advance and finalize the RTSP, discussing potential solutions to publication of the documentation considering regional concerns.

4.11 Transportation Security Planning

4.11.1 Regulatory Basis

23 U.S.C. 134(h)(1)(C) requires MPOs to consider security as one of ten planning factors. As stated in 23 CFR 450.306(a)(3), the Metropolitan Transportation Planning process provides for consideration of security of the transportation system.

The regulations state that the degree and consideration of security should be based on the scale and complexity of many different local issues. Under 23 CFR 450.324(h), the MTP should include emergency relief and disaster preparedness plans and strategies and policies that support homeland security, as appropriate.



4.11.2 Current Status

SCRCOG falls within the Connecticut Department of Emergency Services and Public Protection's (CTDESPP) Division of Emergency Management and Homeland Security (DEMHS) Region 2; RiverCOG falls within Regions 2, 3 and 4. These regions were created to facilitate emergency management and homeland security planning. The Regional Emergency Planning Team (REPT) in each Region is supported by Regional Emergency Support Functions (RESF) or discipline oriented working groups. SCRCOG and RiverCOG participate in regular DEMHS meetings and coordination. DEMHS Region 2 has prepared a draft Evacuation and Shelter Plan that has not yet advanced to completion.

SCRCOG

Critical transportation assets within SCRCOG include two major interstate highways (Interstate 95 and Interstate 91); a major rail hub serving Amtrak, Metro-North, and Shoreline East; Tweed New Haven Regional Airport; and the Port of New Haven. Critical facilities by municipality are identified and mapped in the region's Hazard Mitigation Plan (May 2018, September 2018 Addendum). Interstate diversion plans were prepared within the region more than 10 years ago by CTDOT and SCRCOG is unaware of any plans to update them.

RiverCOG

The region's MTP identifies recommendations for on-going security planning including continued support of ESF-1 (Transportation) activities, promotion of transit operator training for security and crisis management, and improving security at park and ride lots throughout the region. Critical transportation assets within RiverCOG include two major interstate highways (Interstate 95 and Interstate 91), the Amtrak station in Old Saybrook, and the Shoreline East commuter rail service. Diversion Plans associated with Interstate 91 are in the process of being updated, in collaboration with CTDOT.

4.11.3 Findings

SCRCOG

Recommendation: Ensuring diversion routes are easily available to regional first responders and up to date would be a benefit within the region. SCRCOG is encouraged to work with CTDOT, First Responders, and other stakeholders to update previous plans if necessary and post the plans in a location accessible to first responders.



RiverCOG

The MPO is in compliance with federal regulations for this topic area.

4.12 Nonmotorized Planning / Livability

4.12.1 Regulatory Basis

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

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

4.12.2 Current Status

SCRCOG

SCRCOG published the South Central Regional Bicycle and Pedestrian Plan Update in June 2017. Recommendations address on and off- road priority areas, design (corridors and intersections), and policies (complete streets, transit-oriented development, data collection, advancing improvements).

The region continues to advance studies in partnership with their member towns which address connectivity, livability, and bicycle/pedestrian mobility.

RiverCOG

RiverCOG will be working to complete their bicycle and pedestrian plan in the coming year and is in the process of hiring a consultant to assist. An on-line mapping tool, to gather and analyze public input, has been developed.

The region continues to advance planning efforts associated with the Airline trail, working with other stakeholders to develop ways to complete this important multi-regional connection.



RiverCOG has also been working with stakeholders to advance planning for a sidewalk on the Haddam / East Haddam Swing Bridge.

RiverCOG is in the process of preparing the region's first Plan of Conservation and Development which has 4 key themes – sustainable, connected, innovative, and community.

4.12.3 Findings

SCRCOG

Recommendation: SCRCOG has an extensive network of transit services that connect to critical educational, employment, health and housing facilities. It may be beneficial to graphically identify areas of opportunity, ensuring regional transit assets are providing the optimal access to these facilities in addition to an enhanced quality of life.

Available FHWA / FTA Resources:

- The Denver Regional Equity Atlas (Colorado) <http://ctod.org/mhc/demographicsbook-final-web.pdf>

RiverCOG

The MPO is in compliance with federal regulations for this topic area.

4.13 Performance Management

4.13.1 Regulatory Basis

The following citations pertain to requirements for MPOs under performance management:

23 CFR 450.306(d) states that each MPO shall establish performance targets to support the national goals and track progress towards the attainment of critical outcomes. Each MPO shall coordinate with the relevant State to ensure consistency, to the maximum extent practicable, and establish performance targets not later than 180 days after the State or provider of public transportation establishes its performance targets. The selection of performance targets that address performance measures described in 49 U.S.C. 5326(c) and 49 U.S.C. 5329(d) shall be coordinated to the maximum extent practicable, with public transportation providers to ensure consistency with the performance targets that public transportation providers establish under 49 U.S.C. 5326(c) and 49 U.S.C. 5329(d). Additionally, each MPO shall integrate the goals,



objectives, performance measures, and targets from other performance-based plans and programs integrated into the metropolitan transportation planning process.

23 CFR 450.324(f)(3) and (4) outline requirements to the MTP. The MPO MTP shall include:

- a description of the (Federally required) performance measures and performance targets used in assessing the performance of the transportation system.
- a system performance report evaluating the condition and performance of the transportation system with respect to the (Federally required) performance targets including progress achieved by the MPO the performance targets.

23 CFR 450.218(q) and 23 CFR 450.326(d) require that, to the maximum extent practicable, a description of the anticipated effect of the TIP toward achieving the performance targets identified by the MPO in the MTP. TIPs shall link investment priorities to achievement of performance targets in the plan.

23 CFR 450.314(h) requires that the MPO(s), State(s), and the providers of public transportation shall jointly agree upon and develop specific written provisions for cooperatively developing and sharing information related to:

- transportation performance data,
- the selection of performance targets,
- the reporting of performance targets,
- the reporting of performance to be used in tracking progress toward attainment of critical outcomes for the region of the MPO (see § 450.306(d)) and the collection of data for the State asset management plan for the NHS.

23 CFR 450.340 states that MPOs have two years from the effective dates of the planning and performance measures rule to comply with the requirements.

4.13.2 Current Status

SCRCOG

The MPO's approach to performance based planning and programming is an ongoing effort that is being developed and centered around adopting the states targets. The MPO has not considered creating a set of individual targets unique to the region.



The MTP lists the federally required performance measures, but it only identifies targets for the transit asset management (TAM) measures. In addition to the TAM targets, the MTP also includes current performance numbers for each TAM measure (although it is unclear what time period is represented by this information). For all other measures, the MTP does not provide any detail on existing conditions and where the MPO stands on meeting their performance targets.

The TIP contains a full listing of the federally-required performance measures (with the exception of the public transportation safety measures which were not yet required at the time of TIP adoption) along with the performance targets adopted by CTDOT and the MPO for each measure. The information includes baseline performance as well as the targets. The TIP includes reference to the STIP as programming projects to meet the targets with no description of what the anticipated effects of the projects identified in the TIP are toward achievement of the adopted performance targets.

RiverCOG

To date, the MPO has adopted each performance target set by the State and has not adopted any measures or targets unique to the region. The MPO's MTP includes a PBPP section that describes each of the federal performance measures for assessing performance of the transportation system. The MTP only includes the targets for highway safety and transit asset management measures. The PBPP section does not include information, quantitative or qualitative, on current condition and performance of the system and where the MPO stands on achieving their performance targets. The section does include a discussion of CTDOT's Transportation Asset Management Plan.

The TIP contains a full listing of the federally-required performance measures (with the exception of the public transportation safety measures which were not yet required at the time of TIP adoption) along with the performance targets adopted by CTDOT and the MPO for each measure. The information includes baseline performance as well as the targets.

The TIP includes reference to the STIP as programming projects to meet the targets with no description of what the anticipated effects of the projects identified in the TIP are toward achievement of the adopted performance targets.

4.13.3 Findings

SCRCOG

The MTP provides a discussion on performance goals and targets setting but additional information is needed to fully develop a System Performance Report.



Recommendation: In the next MTP update, the MPO should include a system performance report that contains the performance targets it has adopted for all performance measures as well as include information describing the existing conditions of assets and system performance and the progress made toward achieving the performance targets in comparison to previous reports. This information should be included in the MTP as a stand-alone chapter or as an independent document and updated in synchronization with the MTP. The MPO has the option to update the report more frequently and can include progress on a year by year basis.

Recommendation: The TIP should include a description of the effect projects and programs in the TIP have in achieving performance targets identified in the MTP.

Available FHWA / FTA Resources:

- [Example Practices for Performance-Based Planning and Programming, FHWA 2020](#)
- [Model Long-Range Transportation Plans: A Guide for Incorporating Performance Based Planning, FHWA 2014](#)
- [Performance-Based Planning and Programming Guidebook, FHWA 2013](#)

RiverCOG

The MTP is not accompanied by a Transportation System Performance Report, although the MPO has included some of the information required for that report in the TIP.

Recommendation: The next MTP update should include a System Performance Report as a chapter in the MTP or as an independent stand-alone document describing the performance of the transportation system. The MPO should decide whether this information will be provided in a quantitative or qualitative format but should include all federally required measures and associated targets along with information describing the existing conditions of assets and system performance and the progress made toward achieving the performance target in comparison to previous reports. The MPO should also synchronize the System Performance Report update with the MTP although the MPO has the option to update the report more frequently and can include progress made on a year by year basis.

Recommendation: The TIP should include a description of what the effects of the projects in the TIP are anticipated to be in working toward achievement of the adopted performance targets.



Available FHWA / FTA Resources:

- [Example Practices for Performance-Based Planning and Programming, FHWA 2020](#)
- [Model Long-Range Transportation Plans: A Guide for Incorporating Performance Based Planning, FHWA 2014](#)
- [Performance-Based Planning and Programming Guidebook, FHWA 2013](#)

4.14 Congestion Management Process / Management and Operations

4.14.1 Regulatory Basis

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

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

4.14.2 Current Status

Regular CMP reports for the New Haven TMA are prepared, concentrating on roadways with volume-to-capacity (V/C) ratios greater than one. The latest CMP was prepared in 2018; the 2020 CMP was not prepared given reduced traffic volumes in 2020 associated with the pandemic. The next CMP is anticipated to be initiated in July 2021. Although most of the New Haven TMA is included in the CMP, the Town of Cheshire is not represented.

The [Connecticut Statewide ITS Architecture](#) was prepared in 2005, and the Connecticut ITS Strategic Plan was last updated in 1999. Another important document related to traffic signal operations includes the [CTDOT Statewide Computerized Traffic Signal System Needs Assessment](#) (November 2015).



SCRCOG

The region primarily relies on the initiatives from CTDOT to direct the ITS strategies in the state. The region has not received significant interest in ITS initiatives or requests to implement specific ITS technologies from municipalities. ITS interests that transit agencies have are typically coordinated directly between the transit agency and CTDOT.

SCRCOG regularly conducts studies that include operational assessments. Two specific studies were highlighted during the virtual review: Route 146 Corridor Study in Branford / Guilford and Move New Haven Transit Mobility Study. Recommendations from these studies help identify future mobility needs and inform the CTDOT program.

The MPO indicated that for the past 5 or 6 years they have not been actively using their Travel Demand Forecasting model and are instead relying upon CTDOT's statewide model. Although SCRCOG keeps the software up to date, the model inputs have not been regularly maintained.

The T2 Center Traffic Signal Circuit Rider has worked with and presented to SCRCOG.

RiverCOG

A pilot on-demand transit service, XtraMile, was initiated in 2019 by the Estuary Transit District in partnership with RiverCOG. Through a Microtransit mobile application, or by calling the transit district, passengers were offered door-to-door service within an established pilot area covering a three town area and supporting two Shore Line East rail stations.

Within RiverCOG, ITS initiatives are minimal, and efforts are primarily led by CTDOT. Main Street in Middletown is the only coordinated traffic signal system in region and this is managed by the City. RiverCOG is using cell phone data (via Streetlight) to support their planning work and awareness of trip generation within/to their region.

RiverCOG conducts studies that include operational assessments. Two specific studies were highlighted during the virtual review: Route 66 Transportation Study (Portland and East Hampton) and the Route 81 Corridor Study (Clinton). Recommendations from these studies help identify future mobility needs.

The T2 Center Traffic Signal Circuit Rider has worked with and presented to RiverCOG. RiverCOG is a member of the Greater Hartford Traffic Incident Management (TIM) Coalition.



4.14.3 Findings

Recommendation: Federal regulations cited in 23 CFR 450.320(a) call for a TMA-wide CMP process and product. With the next update of the CMP, the MPOs should collaborate with NVCOG to ensure congested corridors in TMA portions of Cheshire are accounted for.

Recommendation: To ensure congestion is managed through an integrated, multi-modal process, the MPOs should collaborate with transit agencies to obtain available transit data (such as on-time performance) for analysis and inclusion in the next CMP.

SCRCOG

Recommendation: Coordination with CTDOT as it relates to ITS within the SCRCOG region is essential, ensuring that future opportunities are identified and planned for. Opportunities for planning, designing, and incorporating ITS elements (e.g. traffic signal technologies, cameras, roadway weather information systems) into regionally sponsored projects should be continually considered. The region should also consider collaborating with CTDOT as it relates to Computerized Traffic Signal Systems needs within the region.

RiverCOG

Recommendation: Coordination with CTDOT as it relates to ITS within the RiverCOG region is recommended, ensuring that future opportunities are identified and planned for. Opportunities for planning, designing, and incorporating ITS elements where appropriate (e.g. traffic signal technologies) into regionally sponsored projects should be considered.

4.15 Environmental Mitigation

4.15.1 Regulatory Basis

23 CFR 324(f)(10) sets forth requirements for the MTP to include a discussion of types of potential environmental mitigation activities and potential areas to carry out these activities. Environmental mitigation includes activities that avoid, minimize, and compensate for impacts to resources. During planning, environmental mitigation may be appropriately conducted at the programmatic level, as well as at the project level. Mitigation activities may be targeted to include actions determined to have the greatest potential to restore and maintain the environmental functions affected by the MTP.

Mitigation efforts undertaken during planning may often be leveraged to provide streamlining throughout project development when these efforts are conducted in consultation with



Federal, State, and Tribal land use and natural/cultural resource regulatory agencies. 23 CFR 450.324(g) requires consultation with these agencies, as appropriate, during development of the MTP. Consideration of existing conservation plans, land use planning maps, resource maps, and natural or historic/cultural resource inventories, as appropriate, in developing the MTP may demonstrate an effort at consultation.

Consultation requirements are primarily set forth in 23 CFR 316 (b-e), and 23 CFR 450.324(f)(10) allows the MPO to establish reasonable timeframes for performing this consultation. In non-attainment and maintenance areas for transportation-related pollutants, 23 CFR 450.324(m) requires interagency consultation, in accordance with EPA's Clean Air Act conformity regulations, at 40 CFR part 93, subpart A, for any interim MTP prepared during a conformity lapse, and consultation in accordance with 23 CFR 450.324(g) when such a plan contains projects not included in a previously approved TIP.

4.15.2 Current Status

SCRCOG

SCRCOG's environmental mitigation discussion is focused on project level efforts and would benefit from an expanded description of mitigation activities that they have undertaken (e.g. NHMP) but not given themselves credit for.

SCRCOG's Public Participation Guidelines do not include a section specific to agency consultation but does mention the inclusion of environmental and Tribal groups when scoping Corridor Studies and other Special Studies. The guidelines do detail the various notifications and meeting types that are employed for the different transportation products and processes in the region.

SCRCOG has worked with their municipalities to develop Natural Hazard Mitigation Plans and has been able to implement a regionally integrated plan over most of their jurisdiction. Flood Resiliency studies have included consideration of transportation asset vulnerability.

RiverCOG

RiverCOG's MTP includes a well-developed Environmental Mitigation discussion, which includes a review of efforts to identify and prioritize environmentally sensitive lands. They have included an overall discussion about environmental mitigation activities and potential areas to carry out these activities in the MTP. It includes recommendations to help offset transportation impacts on the natural environment and presents a prioritized strategic conservation plan that utilizes geospatial planning to prioritize creation and maintenance of a network of habitat



connectivity, provide water quality benefit, and protect open space/agriculture/aesthetic resources.

RiverCOG's Public Participation Plan includes a section on Consultation. The term is applied broadly, and not specifically with reference to interagency or intergovernmental consultation. Tribal entities and historic/cultural resource agencies are not included in the list of groups identified for consultation.

RiverCOG has worked with their municipalities to develop a Natural Hazard Mitigation Plan and has been able to implement a regionally integrated plan over most of their jurisdiction. Flood Resiliency studies have been completed and included consideration of transportation asset vulnerability.

4.15.3 Findings

SCRCOG

Recommendation: The MPO should expand the Environmental Mitigation discussion in the MTP to document required consultation activities and to identify the types of mitigation strategies that may have the greatest potential to restore and maintain the environmental functions affected by the MTP. The MPO should also include the potential areas for which these strategies can be used.

Recommendation: Establish and document relationships with Tribal, State, and local agencies responsible for land use management, natural resources, environmental protection, conservation, and historic preservation concerning the development of the MTP. It would be useful to develop a list of resource agencies and contacts consulted, as well as any consultation agreements, and include it as an appendix in the next update of the MTP. References in the documents should include any existing conservation plans, land use planning maps, resource maps, and natural or historic/cultural resource inventories, as appropriate, utilized in developing the MTP.

Recommendation: It is recommended to invite [CTDEEP's appropriate Watershed Manager\(s\)](#) to participate in their programmatic and project level consultation efforts. The Watershed Manager may be able to provide assistance in prioritizing projects based on environmental complexity or regional resource goals. Their stakeholder liaison role gives them broad familiarity with watershed planning documents, funding availability, and which sources may be able to be used as State match under Title 23.



RiverCOG

Recommendation: It is recommended that a list of resource agencies consulted, and contacts, as well as any consultation agreements, be included as an appendix in the next update of the MTP. References in the documents should include any existing conservation plans, land use planning maps, resource maps, and natural or historic/cultural resource inventories, as appropriate, utilized in developing the MTP.

Recommendation: Ensure a process is followed to document the intergovernmental and interagency consultation efforts that are undertaken, as well as any consultation agreements that may exist. Explicitly include Tribal and historic/cultural resource agencies in the consultation process. Consider inviting [CTDEEP's appropriate Watershed Manager\(s\)](#) to participate in their programmatic and project level consultation efforts. The Watershed Manager may be able to help MPOs prioritize projects based on environmental complexity or regional resource goals. Their stakeholder liaison role gives them broad familiarity with watershed planning documents and funding availability and which sources may be able to be used as State match under Title 23.



APPENDIX A – PARTICIPANTS AND MEETINGS

The following individuals from the federal team were involved in the New Haven urbanized area virtual review meetings:

FHWA	FTA
Kurt Salmoiraghi	Leah Sirmin
Jennifer Carrier	Brandon Burns
Erik Shortell	Chcolby McFarland
Michael Chong	Margaret Griffin
Tim Snyder	
Emilie Holland	

Agendas and attendees of the virtual and public meetings can be found in the next few pages.

Tuesday, March 2, 2021: Lower CT River Valley COG

- 8:30-8:40 (10 Minutes) Virtual Meeting Logistics, Overview and Introductions
- 8:40-8:55 (15 Minutes) RiverCOG Presentation / Comments to Federal Team
- 8:55-9:25 (30 Minutes) Programming Efforts, Financial Planning and TIP Development

Attendees: FHWA: Kurt Salmoiraghi, Jennifer Carrier, Erik Shortell, Michael Chong, Timothy Snyder, Emilie Holland; FTA: Leah Sirmin; Colby Mcfarland; Brandon Burns; Margaret Griffin; CTDOT: Maribeth Wojenski, Sara Radacsi, Grayson Wright, Katheryn Faraci, Rose Etuka; RiverCOG: Sam Gold, Rob Haramut, Paula Fernald, Janice Ehlemeyer, Kevin Armstrong, Margot Burns

Tuesday, March 2, 2021: Lower CT River Valley COG

- 1-1:40 (40 Minutes) Transit Planning Including Coordination with Partnering Agencies, Livability and Bicycle & Pedestrian Planning
- 1:40-2:10 (30 Minutes) Safety, Security and Operations Planning



2:10-2:25 (15 Minutes)	BREAK
2:25-3:10 (45 Minutes)	Civil Rights (Title VI, EJ, LEP, ADA)
3:10-3:30 (20 Minutes)	Public Participation
3:30-3:40 (10 Minutes)	Environmental Mitigation
3:40-3:55 (15 Minutes)	Other Items Surfacing During Earlier Sessions, Closing and Next Steps

Attendees: FHWA: Kurt Salmoiraghi, Jennifer Carrier, Erik Shortell, Michael Chong, Timothy Snyder, Emilie Holland; FTA: Leah Sirmin; Colby Mcfarland; Brandon Burns; Margaret Griffin; CTDOT: Maribeth Wojenski, Sara Radacsi, Grayson Wright, Katheryn Faraci, Tiffany Garcia, Debra Goss; RiverCOG: Sam Gold, Rob Haramut, Paula Fernald, Janice Ehlemeyer, Kevin Armstrong, Margot Burns, Torrance Downes, Megan Jouflas; Others: Joseph Comerford – Estuary Transit

Wednesday, March 3, 2021: South Central CT COG

8:30-8:40 (10 Minutes)	Virtual Meeting Logistics, Overview and Introductions
8:40-9:00 (20 Minutes)	SCRCOG Presentation / Comments to Federal Team
9:00-9:45 (45 Minutes)	Programming Efforts, Financial Planning and TIP Development
9:45-10 (15 Minutes)	BREAK
10-10:45 (45 Minutes)	Transit Planning Including Coordination with Partnering Agencies, Livability and Bicycle and Pedestrian Planning

Attendees: FHWA: Kurt Salmoiraghi, Jennifer Carrier, Erik Shortell, Michael Chong, Timothy Snyder, Emilie Holland; FTA: Leah Sirmin; Colby Mcfarland; Brandon Burns; Margaret Griffin; CTDOT: Maribeth Wojenski, Sara Radacsi, Grayson Wright, Katheryn Faraci, Rose Etuka; SCRCOG: Carl Amento, Stephen Dudley, Jim Rode, Eugene Livshits, Rebecca Andreucci, Christopher Rappa, Andy Cirioli; Others: Rob Haramut – River COG, Mario Marrero – GNHTD, Henry Jadach– Milford Transit District



Wednesday, March 3, 2021: South Central CT COG

1:00-1:45 (45 Minutes)	Civil Rights (Title VI, EJ, LEP, ADA)
1:45-2:05 (20 Minutes)	Public Participation
2:05-2:35 (30 Minutes)	Safety, Security and Operations Planning
2:35-2:55 (20 Minutes)	Environmental Mitigation
2:55-3:15 (20 Minutes)	Other Items Surfacing During Earlier Sessions, Closing and Next Steps

Attendees: FHWA: Kurt Salmoiraghi, Jennifer Carrier, Erik Shortell, Michael Chong, Timothy Snyder, Emilie Holland; FTA: Leah Sirmin; Colby Mcfarland; Brandon Burns; Margaret Griffin; CTDOT: Maribeth Wojenski; Sara Radacsi; Grayson Wright; Katheryn Faraci; Etuka Rose; Tiffany Garcia; Debra Goss; SCRCOG: Carl Amento, Stephen Dudley, Jim Rode, Eugene Livshits, Rebecca Andreucci, Christopher Rappa, Andy Cirioli; Others: Rob Haramut – River COG

Thursday, March 4, 2021: Joint Initiatives – RiverCOG and SCRCOG

1-1:10 (10 Minutes)	Virtual Meeting Logistics and Introductions
1:10-1:55 (45 Minutes)	TMA / MPO Coordination: Overview of coordination efforts (includes SCRCOG, RiverCOG, MetroCOG, and NVCOG) (Includes agreements, MPO structure); Transit partners welcome
1:55-2:25 (30 Minutes)	Congestion Management Process (CMP)
2:25-2:40 (15 Minutes)	Break
2:40-3:10 (30 Minutes)	PBPP (including target setting)
3:10-3:30 (20 Minutes)	Freight Planning
3:30-3:45 (15 minutes)	Other Items Surfacing During Earlier Sessions, Closing and Next Steps



Attendees: FHWA: Kurt Salmoiraghi, Jennifer Carrier, Erik Shortell, Timothy Snyder, Emilie Holland; FTA: Leah Sirmin; Colby Mcfarland; Brandon Burns; Margaret Griffin; CTDOT: Maribeth Wojenski; Katheryn Faraci; Sara Radacsi; Grayson Wright; SCRCOG: Carl Amento, Stephen Dudley, Jim Rode, Rebecca Andreucci, Andy Cirioli; RiverCOG: Sam Gold, Rob Haramut, Kevin Armstrong, Megan Jouflas; Others: Henry Jadach – Milford Transit District; Mario Marrero – GNHTD



APPENDIX B – PUBLIC COMMENTS

No public comments were received during the review process.



APPENDIX C – PREVIOUS FINDINGS AND DISPOSITION

The previous certification review for the New Haven urbanized area was conducted in 2017, with the certification issued on June 1, 2017. The 2017 Certification Review recommendations and the current appraisal are summarized below:

SCRCOG

Recommendations from 2017 Certification Review Report	Current MPO Appraisal (2021)
MPO Structure and Agreements: All MOUs should be updated. The CTDOT has agreed to coordinate with the MPO on an update of all agreements under which the MPO operates.	Per MPO - Update of agreements was started in late 2019 but came to a halt with the pandemic. We will recommence this project once all can return to the office and coordinate and execute properly.
Metropolitan Transportation Plan: Per 23 CFR 450.322(10), for the 2019 MTP, the MPO should develop financial tables consisting of short-term project expectations (e.g., projects in the TIP), medium and/or longer term projects or programs, compared to expected revenues developed by the CTDOT. Project estimates should be made available by the responsible units at CTDOT through their established methodology.	MPO commented 'Included'
<p>Transit Planning: It is recommended that the MPO formalize its process for designating a transit representative either in its bylaws or its MOU.</p> <p>The region should evaluate its LOCHSTP and consider updating it in concert with the next MTP update cycle, as allowed for in FTA Circular 9070.1G.</p>	<p>MPO provided resolution</p> <p>MPO did not comment on this</p>



<p>Civil Rights and Public Involvement: The MPO should merge a spatial representation of TIP projects and descriptions with the demographic mapping that has been produced to help the MPO analyze impacts and to provide a geographic portrayal of the TIP projects for public review.</p> <p>The MPO should develop some strategies to measure Title VI, EJ, LEP or ADA impacts of a targeted project in a selected population cluster, and conduct a pilot social impact report in an attempt to determine the benefits and burdens of a particular project on a particular neighborhood.</p>	<p>MPO commented – ‘Awaiting assistance from CTDOT on location information’</p> <p>MPO commented – ‘Will undertake as appropriate’</p>
<p>TMA Coordination: SCRCOG should work with the other appropriate agencies to update its UZA-based MOUs. They should be updated to reflect changes to COGs and MPOs that have occurred due to restructuring in recent years. They should also incorporate changes to processes since 2002 as well as requirements identified in the US DOT’s final planning rule published in 2016, including 23 CFR 450.314(e) and (g).</p>	<p>See item above</p>
<p>Transportation Safety: The MPO should review the draft SHSP and provide input to the CTDOT on the Plan’s detail. The Safety Circuit Rider should present the state program to the MPO in the near term at a time convenient to the MPO.</p>	<p>MPO commented this was completed</p>
<p>Operations: When a Signal Systems Circuit Rider is hired at UConn’s LTAP Center, the MPO should sponsor an opportunity for its municipalities to have a presentation of what the circuit rider program can offer.</p>	<p>MPO commented that an opportunity has been provided</p>
<p>Nonmotorized Planning / Livability: The Safety Circuit Rider at UConn’s LTAP Center can hold Roadway Safety Assessments in the area of bicycle and pedestrian safety, and the MPO should sponsor an opportunity for its municipalities to have a presentation of what the circuit rider program can offer.</p>	<p>MPO commented ‘Individual communities are taking advantage of this program through CTDOT’</p>



<p>Congestion Management Process: For the next iteration of the CMP, the MPO should include the Town of Cheshire to make the CMP inclusive of the entire TMA.</p> <p>Incorporate the latest CMP within the next MTP in 2019. The MPO should try to compare congested sites with safety data for those sites for any correlation to help identify priority projects for the next MTP.</p>	<p>MPO commented ' Would have been included in update scheduled for FY19-20 but not undertaken due to reduced traffic volumes and pandemic'</p> <p>MPO commented that this was reviewed and addressed.</p>
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RiverCOG

Recommendations from 2017 Certification Review Report	Current Appraisals (2021)
<p>MPO Structure and Agreements: All MOUs should be updated. The CTDOT has agreed to coordinate with the MPO on an update of all agreements under which the MPO operates.</p>	<p>MOUs within the New Haven and Norwich-New London TMA have not been updated.</p>
<p>Transit Planning: The region should evaluate its LOCHSTP and consider updating it in concert with the next MTP update cycle, as allowed for in FTA Circular 9070.1G.</p>	<p>LOCHSTP has not been updated since the last review; The regional Mobility Manager continues to be available to assist individuals in finding public transit options.</p>
<p>Transportation Improvement Program: The TIP should include a clear depiction of the amount of revenue estimated to be available for the region, along with discussion of the assumptions made to determine that figure. This revenue figure can then easily be compared to the programmed costs to clearly demonstrate financial constraint.</p>	<p>MPO commented STIP shows financial constraint and it is challenging for COGs to assess authorizations understanding they do not come at an MPO level.</p>
<p>Civil Rights: The MPO should develop some strategies to measure Title VI, EJ, LEP or ADA impacts of a targeted project in a selected population cluster, and conduct a pilot social impact report in an attempt to determine the benefits and burdens of a particular project on a particular neighborhood in either urban or rural setting.</p>	<p>New Title VI, EJ and LEP strategies were developed in 2019; other updates included an organization chart, complaint procedures, and resolutions.</p>



<p>Freight: While the MPO is assisting in the State's freight plan, it is recommended that the MPO initiate a series of smaller studies that focus on one or more of their unique situations, such as movement of farm products, commercial marine concerns, freight pattern route shifts, freight accommodation in complete streets, and/or conflicts between freight movements and residential land uses. The National Performance Management Research Data Set (NPMRDS) could assist in identifying truck patterns and volumes.</p>	<p>MPO commented that freight issues were looked at in relation to the Rt 81 and Rt 66 Corridor Studies; The Metropolitan Area Planning (MAP) Forum was also referenced and RiverCOG's coordination with NYMTIC on freight (commodity flow analysis)</p>
<p>Transportation Safety – Performance Management: The MPO should review the regional safety data available to begin a preliminary look at specific data at particular sites and work with the CTDOT to pinpoint any trends and to review countermeasures for these locations. The MPO should work with the CTDOT to coordinate the development and documentation of safety targets, per 23 CFR 490.209(c).</p>	<p>MPO referenced the regional safety plan development and coordination with member towns; MPO coordinates with CTDOT annually on safety performance targets</p>
<p>Nonmotorized Planning/Livability: Tangible actions should be developed in the Bicycle and Pedestrian Plan to support the stated objectives. The MPO should take advantage of RSA training through the LTAP center or FHWA Resource Center, so staff can provide assistance to towns not participating in the state's Community Connectivity program and to support actions developed in the Bicycle and Pedestrian Plan. A gap analysis study, to identify network and facility needs, should be undertaken as an action of the Bicycle and Pedestrian Plan, and such analysis should be folded into the 2019 update to the MTP.</p>	<p>RiverCOG will be working in the coming year to finish their bicycle/pedestrian plan; The COG also initiated their first Regional POCD; RiverCOG has worked with the towns on RSAs</p>
<p>Congestion Management Process: The MPO should combine the congestion data from the 2015 Congestion Management report with safety data from recommendations from major corridor plans and the CT Crash Data Repository to present evidence for priority roadway projects for the next MTP in 2019 and for CTDOT project consideration in the near term. Such a process may help the MPO utilize performance management data from both the CMP and safety data compilations to inform the next MTP and support project development.</p>	<p>MPO provide information related to New Haven UZA congested corridors</p>



TMA Coordination Efforts: RiverCOG should work with the other appropriate agencies to update its UZA-based MOUs. They should be updated to reflect changes to COGs and MPOs that have occurred due to restructuring in recent years. They should also incorporate changes to processes since 2002 as well as requirements identified in the US DOT's final planning rule published in 2016, including 23 CFR 450.314(e) and (g).

MOUs within the New Haven and Norwich-New London TMA have not been updated.



APPENDIX D - LIST OF ACRONYMS

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





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