



U.S. Department
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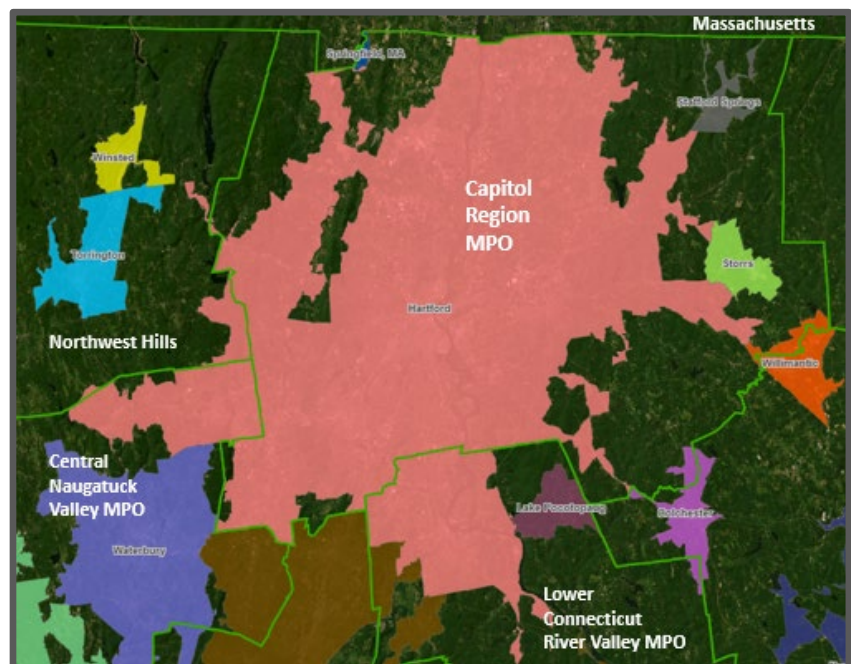
Transportation Management Area Planning Certification Review

Federal Highway
Administration

Federal Transit
Administration

Hartford, CT

Transportation Management Area



January 26, 2026



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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 Hartford – CT urbanized area through hybrid meetings held on October 22 and November 10, 2025. 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 the Capitol Region Council of Governments (CRCOG) who represents the Metropolitan Planning Organization (MPO), the Connecticut Department of Transportation (CTDOT), 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.

A summary of commendations is shown in the below tables.

Hartford, CT TMA	
Review Area	Commendations
1. CMP / Management and Operations	Traffic Incident Management efforts, both within the Hartford TMA, and those advanced by CTDOT, are commended. Specifically, the commitment of staff and resources to advance TIM training, leading to Connecticut being ranked as #1 in TIM training nationally, are applauded. We encourage CRCOG, CTDOT, and other statewide stakeholders to continue their resource collaboration to support future TIM planning efforts.

Capitol Region MPO	
Review Area	Commendations
1. Metropolitan Transportation Plan	The CRCOG is commended for their approach to align the GHMS PEL study with the MTP, clearly documenting core study components and aligning the components with MTP goals by highlighting anticipated benefits and impacts.

2. Transportation Safety Planning	The CRCOG is commended for their extensive, collaborative, and multifaceted approach to safety planning and implementation. This commitment is evidenced by a dedicated staff and broad partnerships with T2, CTDOT, and health institutions. The region has effectively integrated the Safe Systems Approach into both their MTP and RTSP, which they are currently supplementing with a SAP. The CRCOG demonstrates forward-thinking strategic foresight by setting a Vision Zero goal and actively developing the SAP with an internal dashboard for continuous safety monitoring. Furthermore, their practical, town-focused walk audit program provides municipalities with specific, data-driven recommendations and utilizes a clear Story Map format for communication, showcasing an effective combination of regional strategy and direct local action.
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A summary of corrective actions is shown in the below tables.

Capitol Region MPO	
Review Area	Corrective Actions
1. Financial Planning	The TIP must 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. This comparison should make a good faith effort to demonstrate fiscal constraint based on available resources or documented assumptions made by CRCOG. The TIP document must include a summary demonstrating financial constraint by year by funding source. This must be completed no later than September 1, 2026.
2. Performance Management	To align with 23 CFR 450.324(f)(4), CRCOG must have a complete system performance report that clearly displays baseline data, performance targets, and current condition data for all FHWA and FTA required measure areas to illustrate progress achieved in meeting performance targets. This must be completed no later than September 30, 2026.

A summary of recommendations is shown in the below tables.

Hartford, CT TMA	
Review Area	Recommendations
1. TMA Coordination	The CRCOG, RiverCOG, NVCOG, NHCOC, CTDOT and the providers of public transit should update the Hartford - CT TMA agreement, outlining mutual responsibilities in carrying out the metropolitan transportation planning process. The CTDOT should communicate recent changes that have been incorporated into other CT TMA agreements. Additionally, changes as a result of the 2020 decennial census, IJA, and a future transportation bill (anticipated in late 2026), should also be considered. It is strongly encouraged that an updated agreement be in place on or before December 2028.

2. CMP / Management and Operations	We acknowledge that CRCOG is in the process of updating the CMP for the Hartford, CT TMA. When complete CRCOG should transmit to the document to FHWA and FTA and ensure the strategies are incorporated into the next update of each COG's MTP.
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Capitol Region MPO	
Review Area	Recommendations
1. MPO Structure and Cooperation	It is recommended the MPO better define the specific transit and CTDOT representatives and alternates to the MPO board to provide continuity in the event of an absence. This could be formalized by resolution or other documentation.
2. MPO Structure and Cooperation	The federal team acknowledges efforts made to prepare an MPO 101 overview and on-line story map that talks to responsibilities, core transportation plans, and funding. To further enhance clarity as it relates to the MPO, CRCOG may want to provide documentation of the MPO composition or members on CRCOG's website.
3. MPO Structure and Cooperation	The federal team acknowledges the efforts CRCOG has made to engage WRTD in transportation planning within the TMA. To further strengthen collaboration, the federal team encourages the MPO to formalize their involvement on the Transportation Committee or outline other means to collaborate on transportation planning efforts.
4. Financial Planning	For the next full update of the TIP, it is recommended that the MPO work with CTDOT and other stakeholders to develop a more efficient, clear approach to demonstrating fiscal constraint in the TIP. If conversations with stakeholders reveal there are solutions using EcoInteractive reports or if a TMA wide approach is more prudent then these should be documented and advanced as appropriate. If EcoInteractive is a potential tool to assist in demonstrating fiscal constraint, the connection between the TIP and EcoInteractive should be enhanced.
5. Financial Planning	With the next update of the MTP, CRCOG should develop a financial plan that clearly outlines near, mid-, and long-term projects with uniform cost estimating procedures. The CRCOG should consider using IJJA flexibilities that allow cost ranges/bands for project estimates beyond the first four years. In all cases, costs should be reflected in YOY dollars and assumptions should be documented.
6. Transit Planning	During the next CMP update the transit operators should be consulted earlier in the process to allow for more collaboration on the development of performance measures and related mitigation strategies, especially as it relates to transit and TOD.
7. Transit Planning	In the next update to the MTP, CRCOG should consider strengthening their documentation of housing coordination and planning work including how housing considerations are integrated within the transportation planning process and how this aligns with the MTP goals.

8. TIP and Project Selection	The federal team recognizes the efficiencies and opportunities the eTIP platform has introduced within the region. For the next update to the TIP, CRCOG should work to enhance the alignment between the TIP document and the on-line Project Tracker platform.
9. TIP and Project Selection	The CRCOG should work with CTDOT to assess how to best communicate the TIP/STIP Amendment / Action Notification framework to the public and the MPO. The final process should be clearly documented to keep the public and the MPO informed.
10. TIP and Project Selection	In the next update of the TIP, CRCOG should generally document how project selection occurs. If each suballocated program has their own, unique project selection criteria based on the specific program then that should be documented. Connections between the TIP and MTP goals and performance measures should also be outlined.
11. Public Participation	There are discrepancies between the CRCOG <i>Public Participation Plan</i> and the <i>UPWP Statement of Cooperative MPO/State/Transit Operators Planning Roles & Responsibilities</i> as it relates to reviews and evaluation of the overall MPO public participation program. If it is envisioned that the effectiveness of public participation will be evaluated at least every five years, as specified in the PPP, this should be amended in the UPWP for agreement.
12. Civil Rights – Title VI	Overall, while CRCOG has made meaningful progress in updating and implementing its complaint form, CRCOG should more clearly structure the complaint form to separate out Title VI and ADA complaints as the legal bases and process requirements differ between ADA and Title VI. Title VI complaints follow the framework outlined in 49 C.F.R. § 21.11, whereas ADA and Section 504 complaints are governed by disability nondiscrimination statutes with different regulatory standards. Providing clarity in the form will ensure that each type of complaint is processed according to its applicable legal requirement and improve clarity for the public.
13. Freight Planning	It is acknowledged that CRCOG is advancing an effort to secure and analyze freight data and update the regional Freight Fact Sheet. When complete, CRCOG should send a copy of the document to FHWA and ensure the findings are included in the next update of the MTP.
14. Freight Planning	The CRCOG should coordinate with CTDOT as the region works on the Regional Warehousing Land Use and Traffic Study findings and as CTDOT updates the Statewide Freight Plan.
15. Transportation Safety Planning	CRCOG’s safety initiatives should be formalized in existing plans, CRCOG should ensure the SAP is incorporated into the MTP update at its completion.
16. Transportation Safety Planning	The CRCOG should collaborate with the NVCOG as it relates to their efforts in developing and setting their own regional safety performance targets. Further collaboration within the TMA could yield a TMA wide approach or CRCOG approach to developing and setting their own safety performance targets, building upon CRCOG’s current safety planning efforts.
17. Performance Management	The CRCOG should add disclaimers to its newly established project tracker website that acknowledges the fact that when filtering TIP investments by performance measure, the dollar figure may be inflated if a project supports more than one performance measure.

18. CMP / Management and Operations	The CRCOG should collaborate with CTDOT and other regional partners to ensure the most recent ITS plans and projects are considered and documented in the next update of the MTP (e.g. CRCOG should update their MTP to ensure the CT 2023 ITS Architecture is outlined and sourced).
19. CMP / Management and Operations	The MTP references an update to the CRCOG regional ITS Strategic Plan every 5-10 years, the last one was prepared in 2015. The CRCOG should collaborate with CTDOT and with other TMA partners to update the ITS Strategic Plan to align with the MTP.
20. CMP / Management and Operations	To align with 23 CFR 940, CRCOG should work with CTDOT, other MPOs within the TMA, and transit stakeholders to develop and implement procedures and responsibilities for maintaining a regional ITS architecture as needs evolve within the region. It is recommended that general procedures for ITS coordination be expanded upon in the Statement of Cooperative MPO/State / Transit Operator’s Planning Roles and Responsibilities document or within the Agreement Regarding Transportation Planning & Funding in the Hartford Urbanized Area. The CRCOG should also identify which (or both) of the ITS architectures (statewide and regional) should be maintained going forward and if CRCOG’s 2015 Hartford Area ITS Architecture is still applicable, how it can be coordinated or linked with CTDOT’s 2023 architecture or if it should be updated.
21. CMP / Management and Operations	To ensure regional ITS projects conform to the National ITS Architecture and Standards, CRCOG should work to educate regional stakeholders on ITS and the system engineering processes.
22. CMP / Management and Operations	The CRCOG should assess the Statewide Advanced Traffic Management System (ATMS) for Limited Access Highways – Strategic Plan (January 2021) to ensure it is in alignment with both the MTP and CMP and consider sourcing it in the next updates of these documents. The CRCOG and CTDOT should also evaluate opportunities to collaborate on ITS initiatives and share information and data within the TMA.

Connecticut DOT	
Review Area	Recommendations
1. Financial Planning	The CTDOT should collaborate on their capital planning process and narrative with the MPOs to obtain feedback and formalize the fiscal constraint process. Documentation of the coordination effort should be shared with FHWA and FTA. If EcoInteractive reports are anticipated to be used to provide more real time data and reporting capabilities this should be documented in the Statement of Cooperative MPO/State/Transit Operators’ Planning Roles and Responsibilities, the Agreement Regarding Transportation Planning and Funding in the Hartford Urbanized Area, STIP/TIP/MTP documents, or another mutually agreed upon location. If calibration of EcoInteractive fiscal constraint reports is on-going, a schedule for when these reports will be complete should be established and communicated to all stakeholders including MPOs, FHWA and FTA.

2. Metropolitan Transportation Plan	It is recommended that CTDOT further advance how MTPs and other initiatives will be coordinated with state agencies. This coordination should be documented in the <i>Handbook for COGs and MPOs</i> , the <i>Agreement Regarding Transportation Planning and Funding in the Hartford Urbanized Area</i> , MTP documents, or another mutually agreed upon location. The CTDOT should report back to FHWA/FTA on its progress periodically.
3. TIP and Project Selection	The CTDOT should continue to work with the COGs as it relates to project prioritization and project selection. If it is determined that a project ‘pitch meeting’ is where corridor projects are prioritized based on established criteria then that should be documented. If it is decided that a more formal process is needed, then the agreement within the TMA, or the <i>UPWP Statement of Cooperative MPO/State/Transit Operators’ Planning Roles and Responsibilities</i> should be updated to reflect this project prioritization and selection coordination.

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. The Hartford TMA was last certified on February 1, 2022.

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 Metropolitan Planning Organization(s) (MPO), the State Department of Transportation (DOT), and public transportation operator(s) in the conduct of the metropolitan transportation planning process. Joint FHWA/FTA 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 and 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 the metropolitan planning area and those of higher risk. 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.

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 Capitol Region Council of Governments (CRCOG) is the designated MPO for the Hartford – CT urbanized area. The Central Naugatuck Valley MPO (CNVMPO), the Lower Connecticut River Valley MPO, and the Northwest Hills COG serve small portions of the Hartford urbanized area as well. The Connecticut Department of Transportation (CTDOT) is the responsible State agency and *CTtransit* is the primary public transportation operator within the TMA with the Greater Hartford Transit District (GHTD) and Windham Region Transit District (WRTD) also providing transit services.

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.

2.3 Review Process

Participants in the review included representatives of FHWA, FTA, CTDOT, CRCOG, and public transit providers. A full list of participants is included in Appendix A, along with copies of the agendas for hybrid meetings which were held October 22 and November 10, 2025. Opportunities for public and MPO comment were provided at the CRCOG Transportation Committee held on October 20, 2025, and during the MPO meeting held on October 22, 2025. Written comments were also accepted through email and regular mail submittals.

A desk audit of current documents and correspondence was completed prior to the hybrid 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, and findings are summarized in the body of the report for key topic areas. Findings may include commendations, recommendations, or corrective actions. Commendations describe processes and products that are considered notable and identified as best practices. Recommendations identify steps that should be implemented to improve processes and planning products that

already meet minimum federal requirements. Corrective actions describe items that do not meet the requirements of the transportation statute and regulations, along with the actions that must be taken to attain compliance. Failure to address a corrective action may result in a more restrictive certification or the withholding of federal funds. 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.

3.0 PROGRAM REVIEW

3.1 MPO Structure and Cooperation

3.1.1 Current Status

The CRCOG Policy Board acts on MPO items in addition to discussing and acting on broader regional topics of shared interest. The Policy Board consists of 38 municipalities and, when acting as the MPO, includes the primary provider of fixed-route public transportation (CTDOT) and the primary provider of paratransit service (Greater Hartford Transit District). The CTDOT representative also serves as the appropriate State Official and each representative may designate one alternate. The Board meets every month, and meetings are open to the public. The CRCOG May 2025 bylaws outline this MPO structure.

During the on-site review it was relayed that CTDOT representative to the MPO board has fluctuated over time and an alternate has occasionally participated. The CTDOT is not regularly participating in MPO meetings and the specific member, and alternative member, are not clearly documented. The Greater Hartford Transit District (GHTD) typically participates both at the MPO and the Transportation Committee (TC) meetings. Although a regular attendee at MPO and TC meetings, there is no formal documentation of the GHTD member and alternate to the MPO Board.

The CRCOG TC recommends key transportation planning and programming items to the Policy Board. The TC consists of 38 member towns, mostly consisting of municipal engineers and planners, the GHTD and the Connecticut Coalition for Economic and Environmental Justice. CRCOG is in the process of considering the addition a member of Windham Region Transit District (WRTD) to the Transportation Committee. Meetings are held monthly and open to the public. The CRCOG also staffs two subcommittees: Bicycle/Pedestrian and Cost Review. The general composition and function of these committees is outlined in the Public Participation Plan (2025) and on the CRCOG website.

The CRCOG prepared a MPO 101 overview document that explains the roles and responsibilities of MPOs and summarizes core transportation planning documents. In September 2025 CRCOG also developed an on-line story map that provides similar information in addition to CT specific

MPO data and funding information. MPO responsibilities are also generally defined on the website under 'Statutory Functions' although specific MPO membership is not identified.

Roles and responsibilities of the MPO, CTDOT, and the public transportation operators are defined in a written document within the COG's approved *Unified Planning Work Program* (UPWP) for FY 2026 and FY 2027 which outlines the Federally required elements of transportation planning between the parties.

3.1.2 Findings

CRCOG

Recommendation: It is recommended the MPO better define the specific transit and CTDOT representatives and alternates to the MPO board to provide continuity in the event of an absence. This could be formalized by resolution or other documentation.

Recommendation: The federal team acknowledges efforts made to prepare an MPO 101 overview and on-line story map that talks to responsibilities, core transportation plans, and funding. To further enhance clarity as it relates to the MPO, CRCOG may want to provide documentation of the MPO composition or members on CRCOG's website.

Recommendation: The federal team acknowledges the efforts CRCOG has made to engage WRTD in transportation planning within the TMA. To further strengthen collaboration, the federal team encourages the MPO to formalize their involvement on the Transportation Committee or outline other means to collaborate on transportation planning efforts.

3.2 TMA Coordination

3.2.1 Current Status

Hartford, CT TMA

The Hartford - CT urbanized area is primarily contained within the CRCOG regional boundary however it extends into three adjacent areas included in the Lower CT River Valley COG (RiverCOG), the Central Naugatuck Valley COG (NVCOG), and the Northwest Hills COG (NHCOG). Within the TMA, CRCOG organizes a yearly TMA coordination meeting among the COGs. A few coordination examples include their work on the Congestion Management Process (CMP), collaboration on transportation alternatives funding, and their partnership on the Promoting Resilient Operations for Transformative, Efficient, and Cost-saving Transportation (PROTECT) grant.

An Agreement Regarding Transportation Planning & Funding in the Hartford Urbanized Area between CTDOT, CRCOG, RiverCOG, NVCOG, NHCOG, Greater Hartford Transit District (GHTD), Estuary Transit District, and Middletown Area Transit (MAT) was executed in May 2018. A few changes since the agreement was executed: MAT merged into the Estuary Transit District and the system was rebranded as River Valley Transit (RVT) in 2022; the Waterbury, CT urbanized area was designated a TMA by the Secretary of Transportation in October 2023, and an additional suballocated funding program (the Carbon Reduction Program) was established under the Infrastructure Investment and Jobs Act (IIJA). An update to this agreement has not been advanced.

CRCOG

The CRCOG participates in the Metropolitan Area Planning (MAP) Forum which brings MPOs together from the greater New York City area to work on shared concerns. The CRCOG is party to a MOU for coordination of transportation planning activities in the multi-state area covering Connecticut, New York, New Jersey, and Pennsylvania which was executed in 2020.

The CRCOG collaborates with CTDOT and others, such as the Pioneer Valley Planning Commission (PVPC), on travel demand modeling data in addition to other items such as performance measures.

3.2.2 Findings

Hartford – CT TMA

Recommendation: The CRCOG, RiverCOG, NVCOG, NHCOG, CTDOT and the providers of public transit should update the Hartford - CT TMA agreement, outlining mutual responsibilities in carrying out the metropolitan transportation planning process. The CTDOT should communicate recent changes that have been incorporated into other CT TMA agreements. Additionally, changes as a result of the 2020 decennial census, IIJA, and a future transportation bill (anticipated in late 2026), should also be considered. It is strongly encouraged that an updated agreement be in place on or before December 2028.

Additional recommendations related to TMA Coordination are included in the Transportation Safety Planning and Congestion Management Process / Management and Operations sections.

3.3 Financial Planning

3.3.1 Current Status

CRCOG

The CRCOG Metropolitan Transportation Plan (MTP) covers the years 2023-2050 and provides a Financial Plan chapter that details transportation expenditures (both capital improvements and operations and maintenance) and anticipated revenues from federal and state funding sources. The CRCOG also makes good faith estimates of apportionments for the Hartford urbanized area (including Springfield attributable urban funding) for both FHWA and FTA formula programs.

A list of the regional projects is an appendix to the MTP and construction completion dates are generally given in a year range although this is not clear in the column heading and the table is not organized to understand what the short, mid, and long term projects are collectively. It is also not clear if the costs shown are estimated in year of expenditure (YOE) dollars however Appendix D does outline an inflation factor was applied for CRCOG identified projects. IJJA introduced flexibility with MTP estimates beyond the first 4 years and allows for aggregate cost ranges/bands.

The MTP has a well-prepared Innovative Finance chapter that talks to new and improved financing strategies, beyond traditional funding sources, to consider when addressing future unfunded needs of the region. Among the strategies are federal credit programs, a regional sales tax measure, and joint development to name a few. The chapter is also supported with case study research.

The CRCOG Transportation Improvement Program (TIP) which covers FFY2025-2028 has a financial summary statement that talks to fiscal constraint however the TIP does not include a clear comparison of anticipated revenues and programmed expenditures, fiscal constraint is not clearly demonstrated.

CTDOT

The CTDOT provides MTP funding estimates for the MPOs based on an allocation formula that outlines funds for system improvements, system preservation and major projects. This formula and financial information is coordinated with the MPOs for their purposes in preparing their MTPs.

The CTDOT State Transportation Improvement Program (STIP) unit collaborates internally with CTDOT Capital Services unit to evaluate and develop a fiscal constraint table that illustrates authorized funding program amounts and actual STIP programmed amounts by year. This table is updated when STIP amendments are prepared and submitted to FHWA and FTA for their

review and approval. The CTDOT STIP unit is in the process of working with EcoInteractive, an electronic STIP software program, to develop a fiscal constraint table that replicates what is currently being used by stakeholders to manage fiscal constraint. Conversations related to the possibility of EcoInteractive reports assisting in demonstrating fiscal constraint for the MPOs have been ongoing, in addition to the concept of demonstrating fiscal constraint at a TMA level.

In early December 2025, CTDOT provided a narrative on CTDOT's process for capital planning summarizing how funds and projects are programmed, managed and included in the STIP/TIP. The CTDOT's narrative was prepared in response to a finding from the May 2025 New Haven TMA planning certification review and shared with FHWA and FTA. It is unclear if this was coordinated and discussed with the MPOs.

3.3.2 Findings

CRCOG

Corrective Action: The TIP must 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. This comparison should make a good faith effort to demonstrate fiscal constraint based on available resources or documented assumptions made by CRCOG. The TIP document must include a summary demonstrating financial constraint by year by funding source. This must be completed no later than September 1, 2026.

Recommendation: For the next full update of the TIP, it is recommended that the MPO work with CTDOT and other stakeholders to develop a more efficient, clear approach to demonstrating fiscal constraint in the TIP. If conversations with stakeholders reveal there are solutions using EcoInteractive reports or if a TMA wide approach is more prudent then these should be documented and advanced as appropriate. If EcoInteractive is a potential tool to assist in demonstrating fiscal constraint, the connection between the TIP and EcoInteractive should be enhanced.

Recommendation: With the next update of the MTP, CRCOG should develop a financial plan that clearly outlines near, mid-, and long-term projects with uniform cost estimating procedures. The CRCOG should consider using IJJA flexibilities that allow cost ranges/bands for project estimates beyond the first four years. In all cases, costs should be reflected in YOY dollars and assumptions should be documented.

CTDOT

Recommendation: The CTDOT should collaborate on their capital planning process and narrative with the MPOs to obtain feedback and formalize the fiscal constraint process. Documentation of

the coordination effort should be shared with FHWA and FTA. If EcoInteractive reports are anticipated to be used to provide more real time data and reporting capabilities this should be documented in the Statement of Cooperative MPO/State/Transit Operators' Planning Roles and Responsibilities, the Agreement Regarding Transportation Planning and Funding in the Hartford Urbanized Area, STIP/TIP/MTP documents, or another mutually agreed upon location. If calibration of EcoInteractive fiscal constraint reports is on-going, a schedule for when these reports will be complete should be established and communicated to all stakeholders including MPOs, FHWA and FTA.

Available FHWA / FTA Resources:

- [Financial Planning and Fiscal Constraint USDOT – FHWA Website](#)
- Practical Guide to Cost Estimating (AASHTO 2013, Conceptual Estimating)

3.4 Metropolitan Transportation Plan

3.4.1 Current Status

CRCOG

The *Metropolitan Transportation Plan, Long Range Transportation Plan for the Capitol Region, 2023-2050* was completed in April 2023. The MTP provides a broad overview of regional multi-modal assets and how the region will manage and operate the system to meet the region's goals while ensuring the efficient movement of people and goods.

Public engagement for the MTP included an online survey and public meetings, with virtual and in-person options. Comments received and results from the survey are documented in the MTP Appendix.

The CTDOT completed the Greater Hartford Mobility Study (GHMS) in December 2023 outlining several early action and longer-term transportation projects and improvements in the Hartford, East Hartford and surrounding towns. The study was advanced as a Planning and Environmental Linkages (PEL) study, considering environmental, community, and economic goals. To ensure consistency with the MTP, CRCOG conducted an analysis of the study's core components for alignment with major deficiencies and goals identified in the MTP. At the conclusion of the analysis, the MPO endorsed the major components of the study for further advancement. The CRCOG expressed during the on-site meeting that future, larger-scale projects may follow this same MTP alignment approach.

The CRCOG uses their Travel Demand Model to predict future Vehicle Miles Traveled (VMT) and on corridor studies when assessing conceptual improvements. Information from the model has

also been used to assist CTDOT with their GHMS planning efforts. Additionally, model data coordination continues to occur between CRCOG and the MPO covering Springfield, MA.

CTDOT

The CTDOT assumes responsibility for coordinating all of CT's MPO MTPs with other state agencies, as outlined in the *Handbook for Councils of Governments and Metropolitan Planning Organizations* (June 2017). Coordination by CTDOT with other state agencies was not conducted. In May 2025 a finding was issued under the New Haven TMA certification review as it relates to future MTP state agency coordination. In January 2026 CTDOT discussed the topic with MPOs and CTDOT is working to prepare a state agency contact list to be used for future MTP coordination.

3.4.2 Findings

CRCOG

Commendation: The CRCOG is commended for their approach to align the GHMS PEL study with the MTP, clearly documenting core study components and aligning the components with MTP goals by highlighting anticipated benefits and impacts.

CTDOT

Recommendation: It is recommended that CTDOT further advance how MTPs and other initiatives will be coordinated with state agencies. This coordination should be documented in the *Handbook for COGs and MPOs, the Agreement Regarding Transportation Planning and Funding in the Hartford Urbanized Area*, MTP documents, or another mutually agreed upon location. The CTDOT should report back to FHWA/FTA on its progress periodically.

Additional recommendations related to the MTP are included in Financial Planning, Transit Planning, Freight Planning, Transportation Safety Planning, Congestion Management Process / Management and Operations, and Performance Management sections.

3.5 Transit Planning

3.5.1 Current Status

Transit Coordination: The CRCOG continues to incorporate transit planning as priority in the region and demonstrates continuing coordination with the regional transit districts in the planning process. Over the past year both Greater Hartford Transit District (GHTD) and Windham Regional Transit District (WRTD) have brought on new leadership as they continue to work with CRCOG on the Policy Board (GHTD) and Transportation Committee for the region. To further this

partnership, CRCOG is in the process of adding a member of WRTD to the Transportation Committee. There also appears to be cooperation with CRCOG and the transit districts for development of the MTP and TIP. The MTP does a good job describing the existing transit system, as well as discussing opportunities to improve future transit services. Project selection for the MTP and TIP reflect previous work from regional studies, including the Transit Priority Corridor Study. Examples of this work include bus stop optimization and consolidation projects that will improve pedestrian accommodations and combine stops at priority corridors (e.g., Blue Hills Avenue). Both transit districts appear to coordinate regularly with CTDOT and CRCOG to discuss capital programming and identify priority projects for their systems.

The Congestion Management Process (CMP) includes transit and land use/transit-oriented development (TOD) strategies to mitigate congestion within the region. It is good to see land use and TOD included, which align with the MPO's priorities for the region and is a relevant strategy outside transit service specifically. During the on-site meeting CRCOG stated that the CMP document was developed by CRCOG staff, with limited collaboration with transit partners outside of providing data and reviewing the draft document. There is potential for more transit operator consultation in the future, since measures should be established cooperatively by MPO partners in consultation with public transportation operators.

There have been efforts to incorporate first mile/last mile transportation options. The CRCOG and GHTD discussed a micro transit pilot that was successfully implemented into the regional transportation system. GHTD has been one of the providers for the micro-transit service with GHTD Link. The GHTD Link is an on demand rideshare that matches multiple passengers with overlapping routes and similar destinations. Since 2024, the micro transit program has contributed to more than 315,000 rides and 25,000 passengers with a median distance of 1.5 miles. The MPO also offers walk audits to its member communities. One such walk audit was conducted in coordination with Central Connecticut State University (CCSU) to improve safety and connectivity. The CRCOG and CCSU Geography students analyzed bus stops, roundabouts and other bicycle and pedestrian facilities between campus and a nearby CTfastrak stations.

Transit-Oriented Development (TOD): The CRCOG shows a commitment for TOD within its MTP, connecting TOD to its goals, particularly on mobility and access and innovative funding. The MTP describes the importance of TOD as a tool to support various priorities within the region including higher transit ridership, lower roadway congestion, safer conditions for pedestrians and other vulnerable users, improved access to jobs and other destinations, and increased economic development, including housing. The CRCOG continues to build on past studies, analyses, and coordination efforts to advance TOD in the region. The *TOD Roles, Visioning, Viability, and Tools Analysis* details CRCOG's work with State and local partners to develop a plan and identify responsibilities for TOD implementation along the CTfastrak and CTrail Hartford line. This relates to the TMA-wide advisory committee that CRCOG helps facilitate to discuss station area planning along these corridors. The *Plan of Conservation and Development* (POCD) emphasizes the importance of coordinating land use, economic development, and transportation decisions. The POCD, along with the region's Comprehensive Economic Development Strategy (CEDS), were

integrated in the development of the MTP, coordinating CRCOG's key policy documents with transportation planning.

Stemming from housing strategies outlined in the POCD, CRCOG is actively developing a Regional Housing Strategy designed to guide municipalities with implementing local housing plans. The CRCOG is also a liaison to the Connecticut Municipal Development Authority (CMDA), which focuses on TOD and transit-oriented communities. Given the emphasis on housing coordination under IJA, it is noteworthy to see all these efforts underway however there is limited discussion in the MTP on this topic.

The CRCOG and the transit providers are meeting federal requirements to carry out the transportation planning process.

3.5.2 Findings

CRCOG

Recommendation: During the next CMP update the transit operators should be consulted earlier in the process to allow for more collaboration on the development of performance measures and related mitigation strategies, especially as it relates to transit and TOD.

Recommendation: In the next update to the MTP, CRCOG should consider strengthening their documentation of housing coordination and planning work including how housing considerations are integrated within the transportation planning process and how this aligns with the MTP goals.

Additional recommendations related to the Transit Planning are included in MPO Structure and Cooperation, TMA Coordination, and Performance Management sections.

Available FHWA / FTA Resources:

- [Housing in Transportation Planning](#)
- [Transit Oriented Development](#)

3.6 Transportation Improvement Program and Project Selection

3.6.1 Current Status

CRCOG

The CRCOG adopted the FFY 2025-2028 TIP on May 22, 2024. Amendments and actions to the TIP are reviewed by the CRCOG Transportation Committee and recommended to the MPO for approval. Following endorsement of TIP amendments they are posted to the electronic TIP (eTIP)

website. At the time of the desk review the eTIP website was unavailable and conversations with the MPO revealed it was a result of developer updates at that point in time.

The CRCOG began implementing an eTIP system, termed Project Tracker, formally when the FFY 2025-2028 TIP was approved by the MPO. The Project Tracker allows individuals to view project information, comment on amendments, work with an interactive map, and visualize several datasets. Although the public has the opportunity to comment on amendments to the TIP through Project Tracker many individuals do not take advantage of this.

The *Capitol Region Transportation Improvement Program, FFY 2025-2028* document does not include or reference the regions electronic, on-line TIP platform or procedures for amending the TIP document. The CRCOG's *Public Participation Plan* references their TIP Project Tracker but does not include criteria for amending the TIP. The overall TIP amendment / action / notification process is summarized in a document titled *Transportation Improvement Program (TIP) Statewide Transportation Improvement Program (STIP) Amendment / Action Notification Process*, dated December 2023. This document is an internal document between CTDOT, the COGs and the FHWA/FTA.

The CRCOG posts an annual list of projects for which Federal funds have been obligated in the preceding year on-line.

The CRCOG has documented, transparent processes as it relates to project selection for some suballocated or competitive funding programs (e.g. Transportation Alternatives, Congestion Mitigation and Air Quality) and reviews the selection criteria with their Boards prior to each new project solicitation.

The CRCOG uses planning funding associated with their Unified Planning Work Program (UPWP) and goes through the CTDOT corridor solicitation process when advancing studies, and eventually projects, within the region.

During the on-site discussions it was expressed that projects in the TIP have MTP goals and performance-based planning and programming in mind when being selected however specifics are not clearly documented.

CTDOT

The CTDOT is advancing an electronic STIP (eSTIP) throughout the state and, although under development, it is being used when coordinating with CRCOG.

The CTDOT meets with CRCOG staff annually as it relates to project selection under the Surface Transportation Block Grant (STBG) urban program within the Hartford urbanized area. The MPO generally prefers, for this funding source, programming projects that are not on the interstate system. The CTDOT also coordinates with CRCOG yearly on the *Transportation Infrastructure*

Program – Annual Capital Plan Report. The coordination between CTDOT and CRCOG as it relates to the STBG program, and the capital plan are documented in the *Agreement Regarding Transportation Planning & Funding in the Hartford Urbanized Area* (executed in May 2018). The Agreement also references that CTDOT will coordinate with the COGs on developing a project selection process however nothing more formal than what is described in this section has been established.

Following the completion of a COG advanced corridor study, the CTDOT Project Development Unit (PDU) holds a project ‘pitch’ meeting with the COG to talk through project advancement. During these meetings stakeholders talk through short- and long-term projects and begin to assess how projects can advance. However, there is no structured project selection criteria to move projects forward. The CRCOG expressed their approach of focusing project advancement on a reasonable ask that is anticipated to have a higher CTDOT interest (e.g. state roadway, higher crash location).

3.6.2 Findings

CRCOG

Recommendation: The federal team recognizes the efficiencies and opportunities the eTIP platform has introduced within the region. For the next update to the TIP, CRCOG should work to enhance the alignment between the TIP document and the on-line Project Tracker platform.

Recommendation: The CRCOG should work with CTDOT to assess how to best communicate the TIP/STIP Amendment / Action Notification framework to the public and the MPO. The final process should be clearly documented to keep the public and the MPO informed.

Recommendation: In the next update of the TIP, CRCOG should generally document how project selection occurs. If each suballocated program has their own, unique project selection criteria based on the specific program then that should be documented. Connections between the TIP and MTP goals and performance measures should also be outlined.

CTDOT

Recommendation: The CTDOT should continue to work with the COGs as it relates to project prioritization and project selection. If it is determined that a project ‘pitch meeting’ is where corridor projects are prioritized based on established criteria then that should be documented. If it is decided that a more formal process is needed, then the agreement within the TMA, or the *UPWP Statement of Cooperative MPO/State/Transit Operators’ Planning Roles and Responsibilities* should be updated to reflect this project prioritization and selection coordination.

Additional recommendations related to the Transportation Improvement Program and Project Selection are included in the Financial Planning section.

3.7 Public Participation

3.7.1 Current Status

CRCOG

The CRCOG *Public Participation Plan* (PPP) was updated and reorganized to identify guidance for both the public and CRCOG staff, the plan was endorsed in June 2025. The PPP outlines that it will be updated every four to five years and public involvement will be reviewed for effectiveness at least every five years. The CRCOG's Unified Planning Work Program (UPWP) *Statement of Cooperative MPO/State/Transit Operators' Planning Roles & Responsibilities*, outlines that the region annually reviews and evaluates their public participation which is not in alignment with the *Public Participation Plan*.

The CRCOG's PPP documents 2025 public outreach survey feedback from individuals who live, work, and travel in the region. The goal of the survey was to identify collaboration preferences and barriers and use that feedback in both their transportation planning process and in measuring outreach success.

The CRCOG prepared an assessment of public involvement efforts for a period covering fiscal year 2022 through fiscal year 2025. In general, the region will create an outreach program for each of their efforts, draw upon experiences of officials and organizations within a given study area, and aim to try new outreach technologies and methodologies. The CRCOG will also utilize surveys to assess outreach efforts for completed studies and plans.

The CRCOG updated their website in fiscal year 2023 aiming to ensure the website was accessible, particularly to people with limited vision and limited English proficiency. The website also has a language translation option and CRCOG offers free language assistance via Language Line services. The CRCOG has translation services available via a procurement effort, if additional documents need translation.

The CRCOG maintains a stakeholder list representing a cross-section of the region and their newsletter, which sometimes includes opportunities for public input, is emailed to this list. The CRCOG also employs a Senior Communications Manager who posts public meeting information, available surveys, and comment periods on plans/studies using social media platforms including Facebook, LinkedIn, and X.

Public involvement for the MTP included an online public survey in addition to hybrid meetings. Survey responses are documented in the MTP, and comments received along with staff

comments were documented and included in an appendix to the MTP. The CRCOG staff identified the initial survey responses were impacted by bots (resulting in several automated software program responses rather than actual human respondents) but was able to create a methodology to realize legitimate human survey responses.

Public involvement for the FFY 2025-2028 TIP included legal notices, public notice and posting on CRCOG's website in addition to public meetings held both in the morning and evening. Comments received are generally summarized in the TIP document along with a CRCOG staff response.

Public involvement for corridor studies is typically managed by consultants with CRCOG support. Studies employ methods such as public meetings, surveys, or information tables at community events to gather input (also termed pop-up events). The CRCOG develops an interested parties list for a given study to provide more detailed communication by email and corridor study advisory committees assist with providing a broad spectrum of perspectives. The CRCOG utilizes both virtual and in-person engagement to ensure broad participation in studies.

The CRCOG's standing boards and committees operate as virtual or hybrid meetings, depending on the specific meeting and preference of attendees. Transportation Committee (TC) meetings are organized as quarterly hybrid meetings with the balance of meetings held virtually. Occasionally Connecticut Network (CT-N) broadcasts TC meetings. Policy Boards are mostly virtual meetings which aids in increased attendance.

3.7.2 Findings

CRCOG

Recommendation: There are discrepancies between the CRCOG *Public Participation Plan* and the UPWP *Statement of Cooperative MPO/State/Transit Operators Planning Roles & Responsibilities* as it relates to reviews and evaluation of the overall MPO public participation program. If it is envisioned that the effectiveness of public participation will be evaluated at least every five years, as specified in the PPP, this should be amended in the UPWP for agreement.

Available FHWA / FTA Resources:

- [Everyday Counts \(EDC\) 6 – Virtual Public Involvement](#)

3.8 Civil Rights (Title VI, ADA)

3.8.1 Current Status

Title VI: In the 2022 TMA Certification Review, FHWA recommended that CRCOG develop a new complaint form. Since the review, CRCOG updated its Title VI / Non-Discrimination Complaint

Form and posted it on the CRCOG website. Based on discussions during the November 10, 2025, hybrid on-site meeting, CRCOG is currently using the complaint form and corresponding procedures document for both ADA and Title VI complaints.

Title VI covers “race, color, and national origin” and does not include “sex, age or disability.” If a person’s complaint involves sex, age, or disability, those fall under different civil rights laws. “Sex” is covered by Title IX, “age” is covered by the Age Discrimination Act of 1975, and “disability is covered by ADA and Section 504 of the Rehabilitation Act of 1973. USDOT accepts Title VI and ADA complaints. The CRCOG’s Civil Rights / Title VI Information website does not clearly identify these protections, and the Title VI Complaint Process and Procedures document contains a broken link to FHWA’s Guidance.

ADA: Transition Plans: In the 2022 TMA Certification Review, FHWA recommended CRCOG continue its coordination with CTDOT on municipal self-evaluations and ADA Transition Plan development. In addition, FHWA advised that CRCOG provide an annual summary of the Municipal ADA Assessment to FHWA/FTA. Since the review, CTDOT has surveyed all municipalities, achieving a 100% response rate. The CTDOT is also scheduled to execute a contract in 2025 to support Connecticut municipalities in completing their self-evaluations and developing ADA Transition Plans for services, programs, and activities within the public right-of-way. Efforts in CRCOG municipalities have not yet been initiated.

ADA: Communicates with Individuals with Disabilities: In the 2022 TMA Certification Review, FHWA recommended that CRCOG evaluate and strengthen how it communicates with individuals with disabilities. In response, CRCOG has updated its website to include a drop-down feature providing access to the 17 safe-harbor languages, allowing the site to be translated into any of these languages. The CRCOG has also developed internal staff guidance outlining specific methods for ensuring communications accessibility - whether by phone, in-person interaction, or virtual meetings - and is exploring opportunities for staff training in collaboration with local disability advocacy organizations.

3.8.2 Findings

CRCOG

Title VI Recommendation: Overall, while CRCOG has made meaningful progress in updating and implementing its complaint form, CRCOG should more clearly structure the complaint form to separate out Title VI and ADA complaints as the legal bases and process requirements differ between ADA and Title VI. Title VI complaints follow the framework outlined in 49 C.F.R. § 21.11, whereas ADA and Section 504 complaints are governed by disability nondiscrimination statutes with different regulatory standards. Providing clarity in the form will ensure that each type of complaint is processed according to its applicable legal requirement and improve clarity for the public.

Compliance Assessment:

Review Area: Topic	Certification Assessment	Alignment with Regulations
ADA: Transition Plan	CRCOG actions demonstrate continued progress toward strengthening ADA compliance and improving accessibility.	✓ <u>Meets</u> ADA (28 CFR § 35.105) and Section 504 (49 CFR § 27.11)
ADA: Communicates with Individuals with Disabilities	Improvements as it relates to collaboration with local disability advocacy organizations and the development of internal staff guidance reflects CRCOG's commitment to enhancing accessible communication and ensuring that individuals with disabilities can fully engage in CRCOG programs, services, and public participation processes.	✓ <u>Meets</u> Section 504 (49 CFR § 27)

3.9 Freight Planning

3.9.1 Current Status

The CRCOG is engaged in various initiatives related to freight planning in the region including advancement of a Regional Warehousing Land Use and Traffic Study, and freight analysis using Transearch data which was purchased in collaboration with other CT MPOs. The Regional Warehousing Land Use and Traffic Study was initiated to address the rapid growth of e-commerce and unknown impacts to land use and transportation activities associated with warehousing centers. In addition to identifying trends and developing a resource of recommendations for municipalities to consider, the study will produce a freight stakeholder list.

Coordination occurred with CTDOT on the development of the *Connecticut Statewide Freight Plan Update* (December 2022) and the *Connecticut Truck Parking Study* (June 2023). The MPO's MTP includes a section on the Freight Transport System which references this coordination along with short-term and long-term recommendations for freight and ongoing planning efforts. The CRCOG is aware of the upcoming statewide freight plan update (scheduled to be complete in January 2027) and anticipates continued collaboration with CTDOT.

The MPO is also coordinating more broadly on freight planning, maintaining involvement with the Metropolitan Area Planning (MAP) Forum and participating in their Multi-State Freight Working Group. The Working Group collaborates on truck parking, freight studies within the region, and freight data to name a few items.

The MPO prepared a Freight Fact Sheet in 2020, summarizing the state of freight in the region, limitations and challenges, and potential ways to address freight moving forward. The fact sheet

is in the process of being updated and it is anticipated to be completed in State Fiscal Year (SFY) 2026.

The MPO stays informed on national freight trends by participating in FHWA sponsored talking freight seminars. CRCOG's website clearly outlines key freight planning documents and efforts in addition to opportunities for the public and stakeholders to identify areas of concern or join a freight stakeholder list.

3.9.2 Findings

CRCOG

Recommendation: It is acknowledged that CRCOG is advancing an effort to secure and analyze freight data and update the regional Freight Fact Sheet. When complete, CRCOG should send a copy of the document to FHWA and ensure the findings are included in the next update of the MTP.

Recommendation: The CRCOG should coordinate with CTDOT as the region works on the Regional Warehousing Land Use and Traffic Study findings and as CTDOT updates the Statewide Freight Plan.

Available FHWA / FTA Resources:

- [USDOT FHWA Freight Planning Webpage](#)

3.10 Transportation Safety Planning

3.10.1 Current Status

The CRCOG has demonstrated their committed to a multi-faceted safety planning effort. They have embraced a Safe Systems Approach, which is now integrated into the MTP and the Regional Transportation Safety Plan (RTSP), the latter having been amended to reflect this approach. The CRCOG is updating their Safety Action Plan (SAP) under a FY2022 Safe Streets and Roads for All (SS4A) planning grant, which is revising the RTSP and is estimated for completion in December 2025. With this grant, the city of New Britain also developed a SAP. A Vision Zero Task Force provides oversight for CRCOG's SAP. Its members include CTDOT, municipalities, first responders, and educators. The CRCOG also hosted a Vision Zero Workshop for municipal leaders in January 2025.

Some of CRCOG's specialized efforts and studies include:

- CRCOG’s Walk Audit Program which began in 2023, with eight completed over the last two years, providing towns with recommendations and an on-line Story Map summarizing the effort. These audits replaced less effective bicycle/pedestrian counts.
- CRCOG completed the Capitol Region Roundabout Screening Study in June 2024, to identify intersections that could be significantly improved in terms of safety and traffic operations if converted into modern single-lane roundabouts. The study resulted in a list of the top roundabout locations using a data driven screen methodology and notes that it could be used for project prioritization. This study was incorporated into the RTSP.
- CRCOG is pursuing grant work on post-crash care in partnership with Trinity Health of New England to introduce whole blood to first responders.

The CRCOG maintains a regional data portal that includes a safety dashboard built off UConn’s Connecticut Crash Data Repository, intended as a starting point for monitoring progress toward their Vision Zero goal of zero fatalities by 2040.

The CRCOG staff are highly engaged in safety initiatives, serving on the Statewide Vision Zero Council and the Strategic Highway Safety Plan (SHSP) Steering Committee. They collaborate extensively with the UConn Training and Technical (T2) Assistance Center through the Safety Circuit Rider Program.

3.10.2 Findings

CRCOG

Commendation: The CRCOG is commended for their extensive, collaborative, and multifaceted approach to safety planning and implementation. This commitment is evidenced by a dedicated staff and broad partnerships with T2, CTDOT, and health institutions. The region has effectively integrated the Safe Systems Approach into both their MTP and RTSP, which they are currently supplementing with a SAP. The CRCOG demonstrates forward-thinking strategic foresight by setting a Vision Zero goal and actively developing the SAP with an internal dashboard for continuous safety monitoring. Furthermore, their practical, town-focused walk audit program provides municipalities with specific, data-driven recommendations and utilizes a clear Story Map format for communication, showcasing an effective combination of regional strategy and direct local action.

Recommendation: CRCOG’s safety initiatives should be formalized in existing plans, CRCOG should ensure the SAP is incorporated into the MTP update at its completion.

Recommendation: The CRCOG should collaborate with the NVCOG as it relates to their efforts in developing and setting their own regional safety performance targets. Further collaboration within the TMA could yield a TMA wide approach or CRCOG approach to developing and setting their own safety performance targets, building upon CRCOG’s current safety planning efforts.

Available FHWA / FTA Resources:

- [Building Links to Improve Safety: How Safety and Transportation Planning Practitioners Work Together](#)
- [Organizational Safety Culture Self-Assessment for Transportation Agencies - Instruction Manual](#)
 - [Toolkit - Improvement Plan Template](#)
 - [Resources List](#)

3.11 Performance Management

3.11.1 Current Status

Developing, and carrying out, jointly agreed upon specific written provisions for Performance-Based Planning and Programming (PBPP): Appendix A of the CRCOG FY 2026-2027 Unified Planning Work Program (UPWP) includes specific written provisions for the collection of performance data, selection of performance targets, reporting of performance targets, and progress toward achieving performance targets. It also includes a table of Federal performance measures. Developed by CTDOT and circulated for review every two years, these procedures outline the responsibilities between the MPO, State DOT, and transit providers.

Coordinating, establishing, and reporting performance targets: The CRCOG officially endorses targets through approval actions taken by the MPO board. To date, CRCOG has elected to support the targets developed by CTDOT, in cooperation with the State's COGs and transit districts, for the national performance measures. However, CRCOG staff expressed interest in exploring establishing its own safety targets in the future. The CTDOT meets with MPO partners on a regular cycle to share performance data and performance target updates. The CRCOG presents performance data to its Transportation Committee for review and discussion prior to its presentation to the MPO board for adoption.

Evaluating past condition and performance, documenting performance measures and targets, and reporting progress achieved toward meeting targets: The CRCOG FY 2023-2050 MTP provides information on the PBPP rule and the MPO's process for evaluating and advancing performance management. The system performance report describes each of the FHWA and FTA performance measures. For FHWA measures, the report includes targets and actual condition data for each performance measure, but the data presentation (e.g., use of 2023 in each column, use of "measure" instead of "condition") makes it difficult to clearly understand the performance data, as well as the timeframe associated with each metric. Furthermore, baseline data is not included for any measure. For FTA measures, the system performance report includes target information but does not include baseline or current condition data. For all federal measure areas, the MPO's system performance report must include baseline data, targets, and condition data to assess its progress toward meeting its performance targets.

Outside the MTP, CRCOG has created a standalone webpage for PBPP that includes a good summary on performance measures and targets, links to resources and fact sheets, and timely regional data on condition and targets. Although not complete with all required data points, the website essentially serves as another system performance report that provides more up-to-date information for the public.

Linking investment priorities to targets, integrating performance-based plans and programs, and describing anticipated future target achievement: The 2022 TMA Certification Review recommended CRCOG include in the TIP a description of how the anticipated effects of projects support progress toward the adopted performance targets, and how regional transportation investments align with those targets. The CRCOG enhanced its narrative in the FY 2025-2028 TIP by including example project types and explaining how these investments reflect performance goals and support established targets. During the last review FHWA and FTA also suggested summarizing investments by category (e.g., bridges, pavements, congestion mitigation) to better illustrate how program investments address performance goals. Since then, CRCOG and CTDOT developed a project tracker website that allows MPOs to provide all TIP project information in an electronic format, including the performance measure it supports. The project tracker has the capability to summarize programmed funding by performance measure. However, the system is exaggerating this dollar amount in cases where a project is supporting more than one measure. Given this, CRCOG may want to ensure appropriate disclaimers are included. Moving forward, this tool will help CRCOG better assess how investments align with performance goals.

3.11.2 Findings

CRCOG

Corrective Action: To align with 23 CFR 450.324(f)(4), CRCOG must have a complete system performance report that clearly displays baseline data, performance targets, and current condition data for all FHWA and FTA required measure areas to illustrate progress achieved in meeting performance targets. This must be completed no later than September 30, 2026.

Recommendation: The CRCOG should add disclaimers to its newly established project tracker website that acknowledges the fact that when filtering TIP investments by performance measure, the dollar figure may be inflated if a project supports more than one performance measure.

Available FHWA/FTA Resources:

Noteworthy example for documenting performance measures, targets, current conditions, baseline data, and progress in achieving targets:

- Wasatch Front Regional Council's [System Performance Report](#) from their [2023-2050 Regional Transportation Plan](#)

FHWA published the [PBPP Implementation Roadmap](#) to outline all the PBPP requirements and implementation guidelines, and answer frequently asked questions.

FHWA published FHWA published the [Model Long Range Transportation Plans – A Guide for Incorporating Performance Based Planning](#) that contains checklists and examples for integrating different PBPP requirements into the MTPs, including system performance reports.

[FTA PBPP Resources](#)

[FHWA PBPP Resources](#)

The FHWA and the FTA can provide technical assistance to COG staff as needed. Contact the FHWA CT Division and FTA Region 1 liaisons to request support.

3.12 Congestion Management Process / Management and Operations

3.12.1 Current Status

Hartford, CT TMA

The Hartford TMA is required to have a Congestion Management Process (CMP) pursuant to 23 U.S.C. 134(k)(3) and 49 U.S.C. 5303(k)(3). The CRCOG updates the CMP on a periodic basis, generally every 5 years, the last one was prepared in November 2020. The CRCOG leads the CMP effort and coordinates results and strategies with the other COGs within the TMA. Each COG is then responsible for strategy implementation and project development within their region. The CRCOG started updating the CMP in mid-2024, led outreach efforts with other MPOs in the TMA, completed critical data analysis of the National Performance Management Research Data Set (NPMRDS), and began drafting the CMP report. The updated CMP is anticipated to be completed in the Winter of 2026.

CMP strategies will be focused on the 2024 traffic flows, looking at congestion on all freeway routes in the Hartford TMA, as well as select principal arterials, including Route 66 in Middletown. A major finding is that the total vehicle-miles-traveled (VMT) is almost back to pre-COVID levels, and localized congestion is reported down 30%, partly due to improvements made by the Charter Oak Project in Hartford. With the availability of more robust data (e.g. NPMRDS data for Route 6), the CMP is anticipated to incorporate TMA-wide strategies (e.g. park and ride enhancements). Other strategies to reduce vehicular traffic congestion and promote alternative modes of transportation include a TMA wide approach to transit enhancements and transit-oriented development (TOD).

There are several ITS assets within the Hartford, CT TMA including cameras, Road Weather Information Systems (RWIS), Bus Rapid Transit (BRT), Automatic Vehicle Location (AVL) and

Automatic Passenger Counters (APC) on select transit fleets, Variable Message Signs (VMS), and Highway Advisory Radio (HAR), to name a few. The CTDOT facilitated an update of the [Statewide ITS Architecture for Connecticut](#) in 2023 and also prepared a [Statewide Advanced Traffic Management System \(ATMS\) for Limited Access Highways – Strategic Plan](#) in 2021 that identifies potential ATMS projects throughout CT.

The CRCOG has played a role in Traffic Incident Management (TIM) for many years, both within the TMA and statewide. Through their work in establishing the Greater Hartford TIM Coalition (GHTC) they updated TIM policies, supported legislation to reduce fatal and serious injuries to incident responders, produced a TIM field guide for scene management, and maintained diversion plans to name a few initiatives. Additionally, GHTC produces a newsletter that promotes safety for motorized and non-motorized users and communicates ongoing TIM updates and training activities. The CRCOG expressed their TIM Coordinator will be departing the region this year however they are working with other MPOs and statewide partners to discuss two options for maintaining the effort: a TMA/COG managed model or a Department of Emergency Management and Homeland Security (DEMHS) managed model.

The CTDOT has also been engaged in TIM, two notable efforts include their impactful TIM training efforts and supporting the Connecticut DOT Highway Assistance Motorist Patrol (CHAMP) service operation. Connecticut ranks #1 in TIM training as recorded by the National Traffic Incident Management Responder Training Program by FHWA.

CRCOG

The CRCOG prepares corridor studies which assist in identifying future congestion improvements in addition to potential safety and multi-modal enhancements. *The Enfield Traffic Impact Study (TIS) – Routes 190 & 220*, completed in 2023, is one example of this.

The CRCOG prepared a Hartford Area ITS Strategic Plan in March 2015 and maintains this and a Hartford Area ITS Architecture (last updated in November 2014) on their website. CRCOG's MTP and website do not identify the 2023 Statewide ITS Architecture for Connecticut. The MTP references an update of the regional ITS Strategic Plan every 5 to 10 years however CRCOG's documents have not been updated. The CRCOG website references CRCOG's 2015 ITS Strategic Plan and the 2014 Hartford Area ITS Architecture Update however references to the 2023 Statewide ITS Architecture for CT is not sourced, and it not clear which plans and architecture apply. The website also references a regional architecture based on the National ITS Architecture Version 7.0, the latest reference and version is Architecture Reference for Cooperative and Intelligent Transportation (ARC-IT) V9.3.

3.12.2 Findings

Hartford, CT TMA

Commendation: Traffic Incident Management efforts, both within the Hartford TMA, and those advanced by CTDOT, are commended. Specifically, the commitment of staff and resources to advance TIM training, leading to Connecticut being ranked as #1 in TIM training nationally, are applauded. We encourage CRCOG, CTDOT, and other statewide stakeholders to continue their resource collaboration to support future TIM planning efforts.

Recommendation: We acknowledge that CRCOG is in the process of updating the CMP for the Hartford, CT TMA. When complete CRCOG should transmit the document to FHWA and FTA and ensure the strategies are incorporated into the next update of each COG's MTP.

CRCOG

Recommendation: The CRCOG should collaborate with CTDOT and other regional partners to ensure the most recent ITS plans and projects are considered and documented in the next update of the MTP (e.g. CRCOG should update their MTP to ensure the CT 2023 ITS Architecture is outlined and sourced).

Recommendation: The MTP references an update to the CRCOG regional ITS Strategic Plan every 5-10 years, the last one was prepared in 2015. The CRCOG should collaborate with CTDOT and with other TMA partners to update the ITS Strategic Plan to align with the MTP.

Recommendation: To align with 23 CFR 940, CRCOG should work with CTDOT, other MPOs within the TMA, and transit stakeholders to develop and implement procedures and responsibilities for maintaining a regional ITS architecture as needs evolve within the region. It is recommended that general procedures for ITS coordination be expanded upon in the Statement of Cooperative MPO/State / Transit Operator's Planning Roles and Responsibilities document or within the Agreement Regarding Transportation Planning & Funding in the Hartford Urbanized Area. The CRCOG should also identify which (or both) of the ITS architectures (statewide and regional) should be maintained going forward and if CRCOG's 2015 Hartford Area ITS Architecture is still applicable, how it can be coordinated or linked with CTDOT's 2023 architecture or if it should be updated.

Recommendation: To ensure regional ITS projects conform to the National ITS Architecture and Standards, CRCOG should work to educate regional stakeholders on ITS and the system engineering processes.

Recommendation: The CRCOG should assess the Statewide Advanced Traffic Management System (ATMS) for Limited Access Highways – Strategic Plan (January 2021) to ensure it is in alignment with both the MTP and CMP and consider sourcing it in the next updates of these

documents. The CRCOG and CTDOT should also evaluate opportunities to collaborate on ITS initiatives and share information and data within the TMA.

Additional recommendations related to the Congestion Management Process / Management and Operations are included in the Transit Planning section.

Available FHWA/FTA Resources:

- [Architecture Reference for Cooperative and Intelligent Transportation](#) (ARC-IT)
- [Systems Engineering](#)
- [Trainings / Workshops](#)

APPENDIX A – PARTICIPANTS AND MEETINGS

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

Meeting with CRCOG, CTDOT and Regional Stakeholders

Date: Wednesday, October 22, 2025

Agenda:

8:30 AM	0:10	8:40 AM	Introductions and Meeting Logistics
8:40 AM	0:20	9:00 AM	MPO Opportunity to Present
9:00 AM	0:40	9:40 AM	Programming, TIP Development, and Performance Based Planning & Programming
9:40 AM	0:20	10:00 AM	MTP and Financial Planning
10:00 AM	0:15	10:15 AM	Break
10:15 AM	0:25	10:40 AM	Safety Planning
10:40 AM	0:25	11:05 AM	Operations and Management (Including CMP and ITS)
11:05 AM	0:10	11:15 AM	Freight Planning
11:15 AM	0:10	11:25 AM	Closing

Attendees:

CRCOG: Matt Hart, Rob Aloise, Cara Radzins, Dagmar Noll, Roger Krahn, Mike Cipriano, Caitlin Palmer, Anaka Maher, Terri Thompson, Pramod Pandey, Devon Lechtenberg, Sotoria Montanari, Kyle Shiel

CTDOT: Michael Salter, Grayson Wright, Ed Block, Jen Trio, Kelly Cain, Hal Decker, Kevin Danh

FHWA: Jennifer Brady

FTA: Brandon Burns, Ari Ofsevit, Chris Timmel

Meeting with CRCOG, CTDOT and Regional Stakeholders

Date: Monday, November 10, 2025

Agenda:

8:30 AM	0:20	8:50 AM	Public Participation
8:50 AM	0:20	9:10 AM	Civil Rights (Title VI, ADA)
9:10 AM	0:35	9:45 AM	Potpourri (MPO Structure, TMA Coordination, Modeling, Environmental Mitigation, Other)
9:45 AM	0:15	10:00 AM	<i>Break</i>
10:00 AM	0:45	10:45 AM	Transit Planning and Transit Oriented Development (including housing coordination and multimodal connectivity)
10:45 AM	0:15	11:00 AM	Parking Lot Items (If needed)
11:00 AM	0:15	11:15 AM	Closing and Next Steps

Attendees:

CRCOG: Matt Hart, Rob Aloise, Cara Radzins, Caitlin Palmer, Ryan Faulkner, Mike Cipriano, Anaka Maher, Pramod Pandey, Erik Snowden, Roger Krahn, Stephanie Dominello, Heidi Samokar, Dagmar Noll

CTDOT: Michael Salter

FHWA: Jennifer Brady, David Williams

FTA: Chris Timmel, Brandon Burns, Ari Ofvset

Transit Stakeholders: GHFD: Doug Holcomb, Mary Bujeaud; WRTDL Corie Washington

Others: Gary Roux – PVPC, Rob Haramut – RiverCOG, Richard Donovan - NVCOG

APPENDIX B – PUBLIC AND STAKEHOLDER COMMENTS

Meeting: CRCOG Transportation Committee Meeting; 10/20/2025

Remarks heard from Russ Arnold – Farmington, Rob Trottier – Bloomfield, Jeff LaMalva – Manchester, Suzanne Choate – Windsor, Chris Edge – Berlin, Patrice Carson – Bolton; Jason Outlaw – New Britain, Devin Cowperthwaite – Windsor Locks, Mark Moriarty – New Britain, Jon Colman – Committee Chairman and Bloomfield

Note that some individuals have worked with CRCOG in multiple capacities or in multiple towns

Comments:

- CRCOG staff is always available to answer questions, provide support/training and is a helpful resource to new municipal employees.
- CRCOG is always responsive and has the towns interest in mind. At no time do they differentiate between rural or urban – they provide the same services across the board.
- CRCOG staff goes above and beyond to support municipalities.
- CRCOG's role as regional facilitator/convener is invaluable.
- During times of transition with staff, the quality of service has is seamless and they are easy to work with.
- One municipality commented that the CRCOG's process for facilitating LOTCIP project advancement is great. Federally funded projects are more cumbersome.
- CRCOG is a true partner with all their communities and have excellent stakeholder engagement and public involvement in transportation.

Meeting: CRCOG Policy Board Meeting; 10/21/2025

Remarks heard from Wendy Mackstutis – Simsbury, Jon Colman – Bloomfield, Chair of Transportation Committee, Chris Edge - Berlin

- Comments:
What changes have been made to this review, since the one completed 4 years ago? Are there other areas being reviewed?
- The Transportation Committee had a discussion at their meeting this week applauding the work of CRCOG staff as it relates to transportation planning
- CRCOG is a valuable resource, and the towns are fortunate for their work in administering transportation monies.

APPENDIX C – PREVIOUS FINDINGS AND DISPOSITION

The previous certification review for the Hartford-CT urbanized area was conducted in 2022, with the certification issued on February 1, 2022. A mid-cycle meeting was held on April 30, 2024. The 2022 Certification Review recommendations, the notes from the mid-cycle meeting, and the current appraisal are summarized below. Note that the appraisals below are reported by MPO staff; they do not serve as an assessment by the Federal Review Team.

Review Area	Recommendations	Mid Cycle Notes (4.30.2024)	2025/2026 MPO Appraisal (September 2025)
1. MPO Structure and Cooperation	CRCOG and CTDOT should work together to ensure the MPO's approach to meeting the requirement for appropriate state transportation official(s) membership on the MPO board is well-defined and that the member is engaged. The MPO should consider amending their bylaws to better define the roles, responsibilities and voting structure of this official.	CRCOG has CTDOT serve as both a transit rep and as the appropriate state official; Bylaws are currently being revised	CRCOG adopted amended bylaws in May 2025. They can be viewed at https://crocogct.gov/wp-content/uploads/2025/09/By-Laws-May-2025.pdf .
2. MPO Structure and Cooperation	CRCOG should consider assessing Transportation Committee membership to determine if additional organizations could benefit the metropolitan planning process. This committee offers a forum for cooperative planning and information sharing to inform decision making and would benefit from bringing together a range of stakeholders. CRCOG is encouraged to consider participants that can assist in creating a safe, multi-modal, equitable transportation system. In particular, an active representative of EJ communities and representation from of a range of public transportation operators in the region should be considered. Published documents such as the UPWP, and website materials should be updated to appropriately reflect membership.	CRCOG reapproached the EJ member and they since assigned a new EJ point person who has not been active; CRCOG could revisit however they would want to loop in the TC members if there are any adjustments; CCEJ was previous member and they had broader perspectives; The Center for Latino Progress (Jay Stange) may be a willing participant, but they don't want to cut out CCEJ MPO/TC meetings are largely virtual, on-line meetings with quarterly in-person meetings; They have higher attendance virtually than in-person	CRCOG staff presented a memo at the November 2024 Transportation Committee Meeting looking for input on how to fill two Environmental Justice spots. However, the new administration has revoked executive orders related to EJ, so we have halted this effort. CRCOG staff has also proposed adding representatives from WRTD and CTDOT to the Transportation Committee, and Committee members had no objection. CRCOG plans to approach WRTD and CTDOT about this following appointment of a permanent Executive Director at WRTD. We will also confirm Policy Board's support before making any change.

<p>3. TMA Coordination</p>	<p>As the 2020 Census results and TMA boundaries are refined in 2022, CRCOG, CTDOT and other TMA partners should work to assess any changes to the Hartford UZA and potential impacts to existing MOUs and agreements.</p>	<p>The Census resulted in the same urbanized areas more or less however the agreement could use a review</p> <p>Springfield's assessment – PVPC did not feel it needed any changes; CRCOG has not reviewed in detail</p>	<p>CRCOG reviewed MOUs and sent e-mails to MOU partners regarding potential areas to update. PVPC and Hartford TMA partners saw no immediate need to update, and the consensus was to update the MOUs following the next federal transportation bill. This will be discussed again at the Winter 2025/2026 MPO coordination meetings.</p>
<p>4. Financial Planning</p>	<p>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>	<p>In STIP there is a breakdown by funding source by year – not broken down by region; CRCOG references FC aspect of STIP in the TIP however they would need a breakdown by CTDOT to understand how much goes to each region; It is a difficult exercise especially on the transit side; Breaking it down does have a lot of assumptions; Could assume based on population; Suballocated funds could allow for this; Suggested that CTDOT may have to look into this more- consistency across the board; CTDOT wants to find a state that is similar to CT to assist regional TIPs and fiscal constraint</p>	<p>CTDOT did not supply funding amount by region while the TIP was being prepared. Therefore this analysis could not be included in the document as adopted.</p> <p>However, a fiscal constraint report is now available through EcolInteractive for CRCOG's TIP.</p>

<p>5. Transit Planning</p>	<p>There are areas of potential collaboration between the MPO and regional providers of public transportation that the MPO can capitalize on such as CTDOT's Bus Shelter Program which will further improve transit planning and can result in better service for the public. Additionally, the MPO should work with WRTD in response to its request for support and more collaboration, including more frequent communication, which will benefit the region's transit services.</p>	<p>Bus stop enhancement program is ramping up; CRCOG is actively involved in the bus stop enhancement program; They are looking to implement a pilot of the Transit Priorities Corridor Study; WRTD coordination is on their to-do list; CRCOG also wants to sit down with GHTD now that Executive Director has retired; CRCOG also meets with CTDOT Public Transit regularly who is encouraging CRCOG to advance another comprehensive service analysis; CRCOG is looking to hire a transit planner; CRCOG put in a RAISE grant for Berlin Turnpike to plan for transit and bike/ped amenities – CTDOT committed to match the grant if successful</p>	<p>CRCOG is actively involved in the Bus Stop Enhancement Program. We have shared the application materials with our municipalities and met with local officials who requested assistance. We also participate in regular meetings with CTDOT and Hartford related to implementation of new bus shelters and stop optimization in the Blue Hills Avenue corridor.</p> <p>CRCOG met with the new GHTD Director in January 2025. CRCOG's contact lists for Transportation Committee and Policy Board have been updated with his information.</p> <p>WRTD has had interim leadership for the past several years. CRCOG has been waiting to set up a meeting with WRTD until their leadership was solidified. It is our understanding that that should be finalized soon, and we will be requesting a meeting soon thereafter. We have had staff attend WRTD's Board meetings to stay apprised of their work and offer assistance as needed.</p>
<p>6. Transportation Improvement Program</p>	<p>CRCOG 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 current processes for the TIP document and the on-line TIP visual map. Early coordination could identify opportunities to make the two systems more harmonious.</p>	<p>CRCOG purchased eSTIP (ecoInteractive) but have yet to roll it out; eSTIP will supplant their on-line visual TIP as it interacts with GIS alone</p>	<p>The eTIP is operational, including the public facing site and mapping. CRCOG staff continues to coordinate with CTDOT and EcoInteractive staff to ensure mapping accuracy.</p> <p>https://crcog.ecointeractive.com/</p>

7. Transportation Improvement Program	The MPO should ensure the current TIP, including any adopted amendments, are readily available online shortly after endorsement. Although not ideal, a PDF of amendments can be posted to the CRCOG website after adoption, until the overall document is amended. Notations explaining this process can be made on CRCOG's website as well.	eColInteractive will fix this item – on public facing version it will include searchable project lists; CRCOG is about 2 months out from implementation	The eTIP is operational, including the public facing site, which is updated in real time as amendments are adopted. https://crcog.ecointeractive.com/
8. Transportation Improvement Program	CRCOG should assess if the identified equity assessment methodology from 2003 related to environmental justice target areas still fits the regional framework or if other equity-based models may better suit the TMA. This effort should be coordinated with the 2020 Census Data, anticipated for release in 2022. <i>(An additional recommendation is included in the Civil Rights section of this report).</i>	CRCOG is using Justice40 definitions from Climate and EJ Screening tool for disadvantaged populations; The methodology was switched so historical information for comparison is no longer available, although they reference past assessments in narrative format; In general, 35-37% is being spent in EJ areas when only 25% of the population is considered an EJ population	CRCOG used Justice 40 Climate and Economic Justice Screening Tool (CEJST) to define “disadvantaged communities” for the FFY2025-2028 TIP Equity Analysis.
9. Public Participation	As the MPO updates its PPP, it should make a concerted effort to ensure there is a defined process to review the effectiveness of the procedures and strategies being used. The MPO is encouraged to develop measures of effectiveness that can help staff efficiently evaluate outreach efforts and better direct its limited resources. Community involvement in developing these effectiveness measures should be sought, as well as gathering feedback and ideas from targeted populations on ways to best communicate and share information with the public. Defining a regular review and update cycle is recommended.	This effort is on-going; The PPP is being updated and should be done at the end of 2024; PPP will include this comment but it is still unfolding; CRCOG has found success in meeting people where they are (e.g. bus stops, farmers markets) and hybrid opportunities have been effective (less of a time commitment); Most all of their public meetings are hybrid; No tangible metrics at this point in time; Desire to have a more cyclical approach to public participation	CRCOG updated its PPP in June 2025. Staff used a survey to identify an assessment methodology. A review and update cycle for the PPP was also identified in this document. https://crocogct.gov/wp-content/uploads/2025/07/2025-CRCOG-Public-Participation-Plan-FINAL.pdf

10. Public Participation	To assist with public outreach and engagement, CRCOG should prepare a document that explains MPO functions and key transportation planning documents. CRCOG should translate this document in different languages, depending on regional language needs.	Has not been completed – may roll out with PPP	<p>CRCOG has created an MPO 101 flyer. It is available on the website and can be printed and available at public outreach events. This document is also available in Spanish and Polish. https://crocogct.gov/mpo-101-flyer/</p> <p>In addition, CRCOG created an online “What is an MPO?” Storymap, which can be viewed here: https://gis.crocog.org/portal/apps/sites/#/crocog-portal-site/apps/bf6f4c2aad27454bafb4fa129b2beb45/explore</p>
11. Civil Rights (Title VI, EJ, LEP, ADA)	Title VI: The MPO should develop a new complaint form that will accurately capture all of the nondiscrimination statutes and protections. The new complaint form should include race, age, color, disability, national origin, and sex and be titled ‘Title VI/Non-discrimination Complaint Form’.	CRCOG needs to revisit all of the forms; They will also incorporate their new CRCOG address during this process	<p>This has been completed, and the updated forms are available on the CRCOG website.</p> <p>https://crocogct.gov/civil-rights-title-vi-info/</p>
12. Civil Rights (Title VI, EJ, LEP, ADA)	ADA: The MPO has been proactive in collaborating with CTDOT to educate municipalities on their responsibilities under ADA and Section 504 and should continue coordination with CTDOT on municipal self-evaluations and ADA Transition Plans. The MPO should send a summary of the Municipal ADA Assessments to FHWA/FTA on an annual basis.	Meaningful progress has been made, especially over the last few months; CTDOT issued a survey related to ADA compliance and there was 100% participation – CRCOG assisted engaging their towns; CTDOT will have a consultant to assist with transportation related ADA efforts; CRCOG is 3 rd in line for consultant assistance (2025-2026); CRCOG was proactive in issuing comments during the Capital Plan development - on needing assistance / providing funding for unfunded mandate which may have led to CTDOT securing ADA consultant assistance	CTDOT expects to initiate its first phase of consultant assistance for ADA Transition Plans with NVCOG in Fall 2025. Once the pilot is underway, CTDOT will have a better timeline to share regarding an initiation date for CRCOG and the other regions.

<p>13. Civil Rights (Title VI, EJ, LEP, ADA)</p>	<p>ADA: The MPO should assess how it communicates with disabled persons. Alternative formats such as Teletypewriter (TTY) and Telecommunication Device for the Deaf (TDD) services that will allow hearing-impaired individuals to communicate through the telephone to receive information from the MPO should be considered. In addition, there are Relay call services available for those individuals who do not have access to the equipment noted above. As discussed at the certification review, CTDOT is willing to provide technical assistance on the alternative formats to communicate with people with disabilities, and their Office of Contract Compliance can also help CRCOG identify and connect with resources at the local, regional, and state level. To assist with communication, the region may also want to engage resources such as the Kennedy Center, American School for the Deaf, or Independent Living Centers, just to name a few.</p>	<p>CRCOG had a website update since the last review – they now have a drop-down tab for 17 safe harbor languages and can change the website to any of the 17 languages; CRCOG will be talking internally on an approach moving forward; They continue to have note a on their documents, ... if you need auxiliary aids... or interpretation to contact CRCOG in advance</p>	<p>CRCOG had discussions with representatives from the American School for the Deaf, the State of Connecticut Aging and Disability Service, and the Connecticut Association of the Deaf to better understand how to communicate with individuals needing auxiliary aids.</p> <p>The general consensus was that TTY and TTD are no longer a current best practice, replaced by texting, e-mail, or Video Relay Services (VRS). To use the latter, CRCOG need not subscribe to a service, and no special technology is needed.</p> <p>Communication accessibility is grounded in the understanding that each person's communication preferences and needs are unique to the individual, and will differ based on if they are deaf, deafblind, or hard of hearing; literacy level; ability to lip-read; proficiency with American Sign Language, etc. Emphasis should be on asking the requesting individual what communication access support(s) they prefer.</p> <p>CRCOG is developing a guidance document for staff related to the above, highlighting specific methods available for communications accessibility via phone, in-person, and virtual meetings. We will also be exploring related training through local disability advocacy groups.</p>
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<p>14. Civil Rights (Title VI, EJ, LEP, ADA)</p>	<p>EJ: To be consistent with the Executive Order #12898 on EJ, the MPO will need to conduct a benefits 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 specifically include White, Black or African American, American Indian and Alaska native, Asian and Hispanic or Latino 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. The benefits and burden analysis should be publicly vetted, and public input should be sought.</p>	<p>CRCOG currently has a TIP equity analysis out for public review and comment; They shifted toward using federal definitions and Justice 40; They thought of putting an item in the UPWP for consultant assistance – benefits and burdens analysis however they were worried about what FHWA / FTA may issue after the fact; This may be an item for a future UPWP; CRCOG commented that would volunteer to be a test case on this item; CRCOG would want funding for this so maybe next UPWP</p>	<p>This Executive Order has been revoked. CRCOG has halted work in order to be compliant with the new administration.</p>
<p>15. Civil Rights (Title VI, EJ, LEP, ADA)</p>	<p>Executive Orders 14008 and 13985: It is recommended that the MPO increase their awareness of the two Executive Orders, EO 14008 and EO 13985, and prepare itself for the rollout by attending webinars and other virtual meetings as they become available. The MPO should strengthen outreach to Title VI, disability organizations and other community organizations focused on diverse populations. This will help to inform how the MPO can increase and improve communications with these organizations.</p>	<p>This was looked at under PPP update – and they continue to work on understanding the EOs</p>	<p>These Executive Orders have been revoked. CRCOG has halted work in order to be compliant with the new administration.</p>

<p>16. Transportation Safety</p>	<p>CRCOG should work to develop processes to use and update the RTSP and the associated strategy implementation. This may include coordinating with the CTDOT Safety Office to discuss how the RTSP may be used to obtain funding to implement specific safety improvements identified within the RTSP.</p>	<p>CRCOG encourages their towns to look at their Safety Plan and apply for funding; CRCOG wants the update to be something that is used not just sit on a shelf; Many towns are also doing updates. CRCOG can point individuals to a priority list as they go through the update; Not just update the data but develop a communications strategy; They have a Vision Zero task force and interaction with consultant to understand how to move forward; RTSP when in coordination with MTP is a safety action plan</p> <p>They updated RTSP with regional roundabout study</p> <p>Mansfield outreached to CRCOG and they amended roundabout study to bring a location in their town forward (Rt 44 and Rt 195)</p> <p>2nd round of SS4A - a number of towns received funding using their RTSP</p>	<p>CRCOG staff has been working with municipalities to use our existing RTSP for various concept design efforts and competitive funding applications including the awarded FY2024 RAISE Grant for the Berlin Turnpike Corridor Planning Study.</p> <p>CRCOG is using SS4A funds to update its RTSP into a Safety Action Plan. We are aiming to complete this effort by December 2025. As part of the Safety Action Plan update, CRCOG assembled a Vision Zero Task Force. This group has been tasked with guiding the Plan update and will continue to meet following Plan completion to advise on continuing safety efforts.</p>
<p>17. Freight Planning</p>	<p>It is recommended that CRCOG work to update its freight stakeholder list, ensuring that distribution facilities such as Amazon Fulfillment Centers in the region are included.</p>	<p>CRCOG is in the process of advancing a Regional Warehousing Land Use and Traffic Study - looking at the land use and local traffic impacts; 2-3 weeks out from releasing an RFQ; Stakeholder outreach will be part of this; This is in the UPWP</p>	<p>CRCOG has been working to update its freight stakeholder list and will continue to do so in conjunction with the Regional Warehousing Land Use and Traffic Study.</p>

18. Freight Planning	It is recommended that CRCOG continue coordination with CTDOT as it relates to updating the Statewide Freight Plan and work to ensure any strategies identified in the final State Plan, and in the regional Freight Fact Sheet, be incorporated into the MTP.	This was completed; Plan complete in January 2023 and MTP was completed in April 2023 so draft plan is in MTP; CRCOG also incorporated the State Freight Plan in their MTP	No additional comments.
19. Freight Planning	The Region should monitor freight mobility and potential obstacles to economic growth and look for opportunities to work locally, regionally, and statewide in freight planning activities. The Region should especially consider the aspects of through-truck freight movements and freight parking.	This is ongoing – they are part of the MAP form working group on this and they are participating (with NYMTC) on Waste Management Movement Study more broadly; Truck parking aspect will be part into Warehousing Study	<p>CRCOG is conducting a Regional Freight Warehousing and Land Use Study.</p> <p>Also, in coordination with several other MPOs, CRCOG purposed Transearch data in late FY2025. CRCOG staff will be using this data for future freight analysis, including an update to our Freight Fact Sheet.</p> <p>CRCOG remains a member of the MAP Forum’s Multistate Freight Working Group.</p>
20. Nonmotorized Planning / Livability	In support of the regional complete streets plan, policy and projects completed since the last certification review, CRCOG is encouraged to advance their online interactive map to show progress toward completing the regional complete streets network. This effort may prove to be a good performance management tool through the years, tracking progress and assisting in identifying systemwide gaps.	The focus on this has shifted a bit – they are reviewing consultant responses for a regional bike/ped connectivity network; Map is useful for an individual town to understand their micro-priorities and they want to take a step back which will allow priority network; Stress Index Level for bike/ped will be looked at; East Coast Greenway study is wrapping up this year which will more or less conclude their planning	<p>CRCOG is nearing completion on its East Coast Greenway Gap Closure Study.</p> <p>https://crocogct.gov/capitol-region-ecg-study/</p> <p>CRCOG is also conducting a Priority Pathways Study to identify a regional bike/ped network.</p> <p>https://crocogct.gov/priority-pathways/</p> <p>These efforts are redefining bike/ped priorities within the region.</p>

21. Performance Management	The TIP should include a description of how the anticipated effects the projects in the TIP are working toward achievement of the adopted performance targets and how these regional transportation investments align with targets. Consider summarizing the investments by category (e.g. bridges, pavements, congestion mitigation) as a way to analyze how these program investments meet the targets.	CRCOG did not break down by dollar category but instead they did a narrative description on this – what targets are and a discussion on how projects could impact this	In addition to the narrative, CRCOG is also working to tag TIP projects in EcolInteractive with the related performance measures in order to measure funding focused on working towards achieving the performance measures. This effort is anticipated for completion in Fall 2025. Thereafter, TIP Amendments will be tagged with the appropriate
22. Congestion Management Process / Management and Operations	In the next CMP update, Hartford TMA COGs should collaborate on TMA-wide strategies that could benefit management and operations. One example includes park and ride lots that complement travel demand management and the transit system; the CMP currently only documents CRCOG’s available and utilized parking spaces and amenities.	The CMP update will be next year; they are generally on a 5-year cycle so looking at 2025 which misses COVID / stabilized traffic a bit; NPMRDS goes down to a more granular level – they can possibly look at all routes within the TMA; NVCOG interested in Central CT rail line – longer range thought on transit	Staff is currently working on an updated CMP Report, including coordination with other MPOs to develop TMA-wide strategies. We anticipate completion of this report by end of calendar 2025.
23. Congestion Management Process / Management and Operations	Coordination with CTDOT as it relates to ITS within the Hartford TMA is essential, ensuring that future opportunities are identified and planned for. The region should collaborate with CTDOT to determine how/if the CRCOG’s 2015 ITS Strategic Plan should be updated to reflect the region’s plans and implementation of strategies, or to determine if advancing the ITS goals and objectives through a statewide-ITS Strategic Plan is more appropriate. ITS Strategies should ensure they are consistent with the MTP and TIP.	CTDOT was going to take over the effort – they did not see the need to have two plans; This is the same for the architecture as well	CTDOT has taken over efforts related to ITS architecture / strategic planning.
24. Congestion Management Process / Management and Operations	Coordinate with CTDOT to determine which (or both) of the regional ITS architectures should be maintained going forward. Clarify the roles and responsibility for maintaining and updating the regional ITS architecture(s).	See above	CTDOT has taken over efforts related to ITS architecture / strategic planning.

25. Travel Demand Forecasting Model and Scenario Planning	CRCOG is encouraged to collaborate with CTDOT as it relates to the regional Travel Demand Model and the Statewide model to understand opportunities for coordination or potential growth areas. At a minimum, coordination could focus on future MTP updates, greenhouse gas (GHG) emissions data from the Statewide model, or incorporation of new Census data in 2022.	CRCOG just signed a contract for travel demand assistance and are in discussions with how an update of the model would take place and how it would move forward; One of the first tasks is to coordinate with CTDOT modeling; CTDOT was on CRCOGs selection panel	CRCOG has contracted with a consulting firm for Travel Demand Modeling Assistance. One of their Work Tasks includes Model Update Assistance. The initial phase of this work task is about to begin, including compiling and assessing the recent CTDOT travel survey and recent CRCOG model updates performed by Greater Hartford Mobility Program consultants.
26. Travel Demand Forecasting Model and Scenario Planning	CRCOG is encouraged to update other MPOs within the Hartford TMA about the scenario planning process and keep them informed as other regional advancements in scenario planning are made.	CRCOG transitioned to a different software which is more appropriate for regional efforts; CRCOG identified a scenario planning task about telework – more of a training aspect; CRCOG is looking to initiative another scenario planning effort but they want to address the right item that would be meaningful; CRCOG got rid of their regional scenario planning tool but they are trying to make it all work; They are coordinating with other MPOs – it was discussed in the past when they were more actively involved in it	Scenario planning is discussed at annual TMA coordination meetings. CRCOG is not actively involved in regional scenario planning at this time. CRCOG remains available to assist member municipalities with scenario planning efforts.
Other Items that Surfaced during Mid-Cycle Review	PEL Assessment of GHMS and incorporating preliminary projects into MTP	CRCOG had to inform their Transportation Committee and judge the proposed projects against their MTP goals; They prepared a resolution following this; The Study Team at DOT had some initial concern that not all of the boxes were green/good – but it ended up being a good tool	No response needed.

	TMA Coordination	<p>Collaboration with CRCOG has been great per NVCOG (Mark Nielsen) and everyone is being informed and kept in the loop; There is an annual TMA meeting to collaborate, but they get together at other times; They also all participate in the MAP forum and the freight working group is a great value to them</p> <p>CRCOG also commented on the good working relationship with NVCOG and working on the PROTECT application was positive; NVCOG took the lead, working with CRCOG, NECCOG and NHCOC to develop a PROTECT application which they were awarded; the Scopes of Work and RFQ are currently being assembled</p>	No response needed.
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APPENDIX D - LIST OF ACRONYMS

ADA: Americans with Disabilities Act
CAA: Clean Air Act
CFR: Code of Federal Regulations
CMP: Congestion Management Process
DEMHS: Department of Emergency Management and Homeland Security
DOT: Department of Transportation
eSTIP/eTIP: Electronic State Transportation Improvement Program or Electronic TIP
FHWA: Federal Highway Administration
FTA: Federal Transit Administration
FY: Fiscal Year
HSIP: Highway Safety Improvement Program
IJA: Infrastructure Investment and Jobs Act
ITS: Intelligent Transportation Systems
M&O: Management and Operations
MPA: Metropolitan Planning Area
MPO: Metropolitan Planning Organization
MTP: Metropolitan Transportation Plan
NAAQS: National Ambient Air Quality Standards
NHI: National Highway Institute
NPMRDS: National Performance Management Research Data Set
PBPP: Performance Based Planning and Programming
PPP: Public Participation Plan
PEL: Planning and Environmental Linkages
PTASP: Public Transportation Agency Safety Plan
RTSP: Regional Transportation Safety Plan
SAP: Safety Action Plan
SS4A: Safe Streets and Road for All
SHSP: Strategic Highway Safety Plan
STIP: State Transportation Improvement Program
TIM: Traffic Incident 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
VMS: Variable Message Sign
YOE: Year of Expenditure

APPENDIX E – REGULATORY FRAMEWORK

Topic	Regulatory Overview
MPO Structure and Cooperation	<p>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 metropolitan planning area (MPA). These agreements should also be periodically reviewed and updated to reflect changes.</p> <p>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.</p>
TMA Coordination	<p>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.</p> <p>More specifically, 23 CFR 450.314(e) states:</p> <p>"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."</p>
Financial Planning	<p>Financial planning is a systematic approach where a State, MPO, or transit operator manages its financial resources utilizing financial tools to determine how to fund the maintenance and operation of, as well as capital improvements to, its transportation system over both the short-term (4-year TIP) and long-term (20-year MTP). The 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-n), for the Transportation Improvement Program (TIP). Separate financial plans demonstrate how the adopted MTP, and TIP can be implemented.</p> <p>The financial requirements related to the MTP include the following, at a minimum:</p> <ul style="list-style-type: none"> • Revenue estimates are cooperatively developed by the State, the MPO, and public transportation operators.

	<ul style="list-style-type: none"> • Revenue estimates include public and private sources that are committed, available, or reasonably expected to be available within the timeframe anticipated for implementation of the project. • Revenue estimates may include recommendations for new funding sources, which should be supported by identified strategies for securing their availability. • System-level estimates of operation and maintenance costs for Federally supported facilities and services are taken into account to determine resources remaining available for capital expenditure. • Cost and revenue estimates incorporate inflation rates reflecting year of expenditure (YOE) dollars. • The quality of cost estimates is important in the MTP (and TIP). Cost estimates should be reviewed and the process and methods (and any assumptions) for determining costs should be documented. • Cost estimates in the MTP should be reviewed and periodically updated, at least as frequently as each MTP update. <p>The financial requirements related to the TIP include the following, at a minimum:</p> <ul style="list-style-type: none"> • Demonstrate and maintain financial constraint by year. • Identify projects to be funded with current and available revenues. • Identify estimated total project cost, which may extend beyond the four years of the TIP. • System-level estimates of operation and maintenance costs for Federally supported facilities and services are considered when estimating resources remaining available for capital expenditure. • Cost and revenue estimates incorporate inflation rates to reflect YOE dollars. • The quality of cost estimates is important in the TIP (and MTP). Cost estimates should be reviewed and the process and methods (and any assumptions) for determining costs should be documented. • Cost estimates in the TIP should be reviewed and periodically updated, at least as frequently as each TIP update. • Only projects or phases of projects if full funding can reasonably be expected to be available for the project within the time period anticipated for completion of the project.
Metropolitan Transportation Plan	<p>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.</p> <p>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.</p> <p>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</p>

	<p>reflect current and forecasted transportation, population, land use, employment, congestion, and economic conditions and trends.</p> <p>Under 23 CFR 450.324(f), the MTP is required, at a minimum, to consider the following:</p> <ul style="list-style-type: none"> • Projected transportation demand • Existing and proposed transportation facilities • Description of performance measures and targets • System performance report and subsequent updates • Operational and management strategies • Congestion management process • Vulnerability of the existing transportation infrastructure to natural disasters • Capital investment and strategies to preserve transportation infrastructure and provide for multimodal capacity • Design concept and design scope descriptions of existing and proposed transportation facilities • Potential environmental mitigation activities • Pedestrian walkway and bicycle transportation facilities • Consultation with agencies and officials responsible for land-use management, natural resources, environmental protection, conservation, and historic preservation • Consultation with agencies and officials responsible for natural disaster risk reduction • Transportation and transit enhancements • A financial plan • Provision of public agencies, citizens, and other interested parties with a reasonable opportunity to comment • Conformity determination in nonattainment and maintenance areas • Consultation with agencies and officials responsible for other planning activities within the TMA that are affected by transportation, including Indian Tribes and Federal Land Management Agencies
Transit Planning	<p>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.</p>
Transportation Improvement Program and Project Selection	<p>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:</p> <ul style="list-style-type: none"> • 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.

	<ul style="list-style-type: none"> • 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 <p>23 U.S.C. 134(j)(7) and 23 CFR 450.334 requires that the State, the MPO, and public transportation operators cooperatively develop a listing of projects for which Federal funds under 23 U.S.C. or 49 U.S. C. Chapter 53 have been obligated in the previous year.</p> <p>23 CFR 450.206 requires the statewide transportation planning process shall provide for the establishment and use of a performance-based approach to transportation decision making to support the national goals described in 23 U.S.C. 150(b) and the general purposes described in 49 U.S.C. 5301.</p>
Public Participation	<p>Section 134 of Title 23 and Section 5303 of Title 49 require a 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, which requires 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.</p> <p>The federal planning regulations further define specific activities to be carried out by the MPO, including making public information available in electronically accessible formats and means; demonstrating explicit consideration and response to public input received during the development of the MTP and the TIP; seeking out and considering the needs of those traditionally underserved populations who may face challenges accessing employment and other services; periodically reviewing the effectiveness of the procedures and strategies contained in the participation plan to ensure a full and open participation process; and consult with agencies and officials responsible for other planning activities within the MPA that are affected by transportation.</p>
Civil Rights	<p>Title VI of the Civil Rights Act of 1964, prohibits discrimination based upon race, color, and national origin. Specifically, its protections extend to individuals with Limited English Proficiency, safeguarding them from discrimination due to language barriers.</p> <p>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.</p> <p>The Executive Order 13166 of August 11, 2000 (Improving Access to Services for Persons with Limited English Proficiency) was revoked on March 1, 2025. However, nothing in the March 1, 2025, Executive Order requires or directs any change in the services provided by MPOs.</p> <p>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,</p>

	<p>or, missing where they should have been constructed) and other activities and services that prevent access for persons with disabilities.</p> <p>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.</p>
<p>Freight Planning</p>	<p>Federal surface transportation law calls for the need to address freight movements as part of the transportation planning process (23 U.S.C. Section 134 and 23 CFR 450.306). Additional requirements of MPOs to integrate freight planning into the transportation planning process include:</p> <ul style="list-style-type: none"> • As part of the MPO public participation planning requirements under 23 U.S.C. Section 134 and 23 CFR 450.316, consultation requirements were expanded to include freight shippers as interested parties that should be provided a reasonable opportunity to comment on MTPs and TIPs. • 23 CFR 490.613 implements the requirements of 23 U.S.C. 150(c)(6) to establish performance measures for State Departments of Transportation (State DOTs) and the MPOs to use to assess the national freight movement on the Interstate System. • 23 CFR 450.316(d)(4)(vi) states that an MPO shall integrate in the metropolitan transportation planning process, directly or by reference, the goals, objectives, performance measures, and targets described in other State transportation plans and transportation processes, including as appropriate (metropolitan) portions of the State Freight Plan. • 23 CFR 490.105 and 23 CFR 490.107 requires the MPOs to address the target establishment and reporting requirements for the Freight Reliability measure.
<p>Transportation Safety Planning</p>	<p>The FAST Act emphasizes a performance-driven, outcome-based approach to metropolitan transportation planning, requiring MPOs to consider safety as one of ten planning factors in their processes. Specifically, under 23 CFR 450.306(a)(2), the planning process must integrate projects, strategies, and services that enhance the safety of the transportation system for both motorized and non-motorized users. MPOs are also expected to incorporate safety into project prioritization and decision-making processes.</p> <p>SAFETEA-LU established the Highway Safety Improvement Program (HSIP) (23 U.S.C. 148), a core safety program that mandates states to develop Strategic Highway Safety Plans (SHSPs). Consistent with 23 CFR 450.306(d), MPOs must align their planning processes with the SHSP and other transit safety and security planning, adopting a performance-based approach that tracks measurable safety outcomes.</p> <p>Building on this, MAP-21 introduced a streamlined, performance-based framework, expanding the National Highway System (NHS) and strengthening the HSIP by requiring data-driven safety analysis. It also emphasized national goals such as safety, infrastructure condition, and system efficiency. The IJA further enhanced these efforts by providing substantial funding for highway programs and creating opportunities for MPOs to compete for funding. Additionally, under 23 CFR 490.209, MPOs must coordinate with State DOTs to establish annual performance targets for each highway safety performance measure, ensuring consistency and collaboration to improve safety outcomes. These targets must be set by MPOs no later than 180 days after the relevant State establishes its own targets.</p>

Performance Management	<p>23 CFR 450.306(d)(1) requires the establishment and use of a performance-based approach to transportation decision making to support the national goals described in 23 U.S.C. 150(b) and the general purposes described in 49 U.S.C. 5301(c).</p> <p>23 CFR 450.306(d)(2)(i) requires MPOs to establish performance targets that address the performance measures or standards established under 23 CFR part 490 (where applicable), 49 U.S.C. 5326(c), and 49 U.S.C. 5329(d) to use in tracking progress toward attainment of critical outcomes for the region of the MPO.</p> <p>23 CFR 450.306(d)(2)(ii) requires the selection of targets under 23 CFR Part 490 to be coordinated with the relevant State(s) to ensure consistency, to the maximum extent practicable, and 23 CFR 450.306(d)(2)(iii) requires the selection of targets under 49 U.S.C. 5326(c) and 49 U.S.C. 5329(d) to be coordinated with public transportation providers to ensure consistency, to the maximum extent practicable.</p> <p>23 CFR 450.306(d)(4) requires MPOs to integrate in the metropolitan transportation planning process, directly or by reference, the goals, objectives, performance measures, and targets described in other transportation plans and transportation processes, including the State asset management plan for the National Highway System (NHS), Highway Safety Improvement Program (HSIP), Strategic Highway Safety Plan (SHSP), State Freight Plan, Transit Asset Management Plan, Public Transportation Agency Safety Plan, Congestion Mitigation and Air Quality Improvement Program (CMAQ) Performance Plan, and Congestion Management Process (CMP).</p> <p>23 CFR 450.314(h) requires MPOs, States, and the providers of public transportation to 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, and the collection of data for the State asset management plan for the NHS.</p> <p>23 CFR 450.324(f)(3) requires the metropolitan transportation plan (MTP) to include a description of the performance measures and performance targets used in assessing the performance of the transportation system, and 23 CFR 450.324(f)(4) requires a system performance report evaluating the condition and performance of the transportation system with respect to the performance targets, including baseline data and progress achieved by the MPO in meeting the performance targets in comparison with previous reports.</p> <p>23 CFR 450.326(c) requires the transportation improvement program (TIP) to be designed such that once implemented it makes progress toward achieving the performance targets, and 23 CFR 450.326(d) requires a description of the anticipated effect of the TIP toward achieving the performance targets identified in the metropolitan transportation plan, to the maximum extent practicable, linking investment priorities to those performance targets.</p>
Congestion Management Process / Management and Operations	<p>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.</p>

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.

All Intelligent Transportation Systems (ITS) projects funded by the Highway Trust Fund must be consistent with the provisions laid out in 23 CFR 940. A few items included in 23 CFR 940:

- Provision should be made to include participation from the following agencies, as appropriate, in the development of the regional ITS architecture: Highway agencies; public safety agencies (e.g., police, fire, emergency/medical); transit operators; Federal lands agencies; State motor carrier agencies; and other operating agencies necessary to fully address regional ITS integration.
- The agencies and other stakeholders participating in the development of the regional ITS architecture shall develop and implement procedures and responsibilities for maintaining it, as needs evolve within the region.
- ITS projects shall conform to the National ITS Architecture and Standards.
- Any major ITS project shall have a project level ITS architecture that is coordinated with the development of the regional ITS architecture.
- All projects shall be developed using a systems engineering process.