

**To:** Transportation Cost Review Sub-Committee  
**From:** Timothy Malone, Principal Planner  
**Date:** October 11, 2019  
**c:** CRCOG Transportation Committee  
Rob Aloise, Director of Transportation Planning  
Emily Hultquist, Director of Policy and Planning  
**Subject:** Draft Complete Streets Policy

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At the September 2019 Transportation Committee meeting, a draft of the regional complete streets policy was presented for review. To provide a more detailed examination of the policy's elements, staff plan to give a presentation on the policy at the October Cost Review Subcommittee meeting. The presentation will go into more detail on a few of the key elements of the policy. Those elements are:

- The basic policy, which requires, unless an exception is granted, that all projects receiving funding through CRCOG adhere to the policy and provide accommodation for all users.
- The exceptions process.
- Acknowledgement of context sensitivity.
- Design guideline recommendations
- Prioritization of vulnerable users.

A draft of the policy was posted with the September Transportation Committee meeting notice: <http://crcog.org/wp-content/uploads/2018/12/Complete-Streets-Policy-Memo.pdf>

Barring any major comments, we would ask for endorsement at the October or November Subcommittee or TC meetings. It will then be sent to the Policy Board for their review the month after endorsement by the TC. The goal is to have it adopted by the Policy Board in November. Please send any comments or questions to Tim Malone: [tmalone@crcog.org](mailto:tmalone@crcog.org)

## Memorandum

**Date:** July 19, 2019 [FINAL DRAFT]  
**To:** Emily Hultquist, AICP  
Tim Malone  
**Cc:** Nick Jackson (Toole Design)  
**Organization:** Capitol Region Council of Governments (CRCOG)  
**From:** Jeff Brubaker, AICP (Toole Design)  
**Via:** Michael Morehouse, PE (FHI)  
**Project:** CRCOG Complete Streets Plan  
**Re:** Final Draft Complete Streets Policy

This document presents a **final draft** of the Capitol Region Council of Governments (CRCOG) Complete Streets Policy. This final draft is based on the annotated outline submitted in August 2018 and has been revised per subsequent rounds of comments received from you, other CRCOG staff, and the Active Living/Active Transportation Advisory Committee. This version accepts the tracked changes of the previous version (dated July 15, 2019).

# Capitol Region Council of Governments Complete Streets Policy

FINAL DRAFT – July 2019

## Findings

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WHEREAS, [Connecticut General Statutes Sec. 13a-153f](#) provides that “Accommodations for all users shall be a routine part of the planning, design, construction and operating activities of all highways, as defined in section 14-1, in this state”, where “user” means a motorist, transit user, pedestrian, or bicyclist; and,

WHEREAS, complete streets are placemaking tools. They will help the region address the challenge, articulated in the [Capitol Region Plan of Conservation and Development 2014-24 \(POCD\)](#), of “attracting and retaining the highly educated and mobile workforce by creating places where they want to live”; and,

WHEREAS, the POCD (Ch. 10) emphasizes that the region’s transportation system “must effectively move both people and goods, using a variety of modes: street and highway, public transportation, rail, air, and active transportation (travel on foot or by bike). The improvement, integration, and accessibility of these components to all residents of the Capitol Region are essential not only to regional quality of life, but also to the region’s competitiveness in a global market”; and,

WHEREAS, the POCD (Ch. 10) also states: “CRCOG’s selection criteria for transportation projects funded under the Surface Transportation Program incorporate many complete street components that enhance transit, pedestrian and bicycle mobility. Opportunities to refine the selection criteria based on enhancements to the state or U.S. DOT policies will be explored in future project solicitations, continuing CRCOG’s commitment to advance projects that support complete streets”; and,

WHEREAS, the State of Connecticut, through the Connecticut Department of Transportation (CTDOT), has adopted a [Complete Streets Policy](#). It is the policy of CTDOT to “consider the needs of all users of all abilities and ages (specifically including pedestrians, bicyclists, transit users, and vehicle operators) in the planning, programming, design, construction, retrofit, and maintenance activities related to all roads and streets as a means of providing a ‘safe, efficient transportation network which enhances quality of life and economic vitality’”. The policy states that “Complete Streets shall be considered in all projects receiving state or federal funding”; and,

WHEREAS, the [Capitol Region Transportation Plan: A guide for transportation investments through the year 2040](#) (2015), the region’s long-range transportation plan (LRTP), includes

complete streets in its overarching goals: “Support Sustainable and Livable Community Goals. CRCOG will support the goals of sustainable development and livable communities. Support will come at all levels of the planning process from systems planning through project development and design...Placing an emphasis on developing ‘Complete Streets’ that serve all users of the transportation network: motorists, pedestrians, transit users, and bicyclists”; and,

WHEREAS, the LRTP emphasizes that “CRCOG will support and encourage Complete Streets efforts by: “Incorporating Complete Streets elements into our planning efforts and work to ensure that all modes of transportation are taken into consideration; Educating communities about latest ‘Complete Streets’ design practices and legislation; [and] Researching additional funding opportunities for projects that include Complete Streets initiatives”;

NOW, THEREFORE, BE IT RESOLVED THAT the Policy Board of the Capitol Region Council of Governments adopts the following Complete Streets Policy.

## Vision and Intent

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More than anything, a street should be a *place*. The Capitol Region’s streets are public space, and they should be more than just where we travel—they should be where we gather, play, socialize, celebrate, and buy and sell goods. For a long time, streets had these many purposes. But, starting about one hundred years ago, we stopped prioritizing this variety of purposes in favor of something more singular: the fast and uninterrupted movement of automobiles.

Complete streets are an integral part of reversing this trend. The value of complete streets may be articulated using the themes of the [One Region, One Future](#) Action Agenda (2014) and POCD.

### Vision: The Capitol Region will be Connected

- *Why this is important:* Investments in big infrastructure – highways, train corridors, and airports – have created better connections between the Capitol Region and economic markets in Boston and New York. However, the roadway network within and between the cities and towns of the Capitol Region is rooted in automobile dependence, lacks affordable options, and is inequitable when it comes to access to opportunity.
- *How complete streets help:* Through this Complete Streets Policy, CRCOG will help the economy thrive by funding projects that make streets safer, more convenient, and well-connected for people accessing economic opportunity, whether by foot, wheelchair, bike, train, bus, car, or truck. CRCOG will also facilitate multi-jurisdictional coordination, recognizing that a region of complete streets can only happen through cooperation between member cities and towns, as well as the State of Connecticut.

### Vision: The Capitol Region will be Competitive

- *Why this is important:* The Capitol Region’s transportation system helps to attract and retain a highly educated and mobile workforce.

- *How complete streets help:* Complete streets will provide the bones of a competitive region, one that connects residents to educational opportunities, brings in anchor institutions and employers, encourages smart and sustainable development patterns, and leads to the creation of strong, resilient, and diverse neighborhoods. The Capitol Region will build competitiveness from within by proactively investing in communities experiencing poverty, racial inequities, language barriers, and disproportionate environmental and health risks and costs.

**Vision: The Capitol Region will be Vibrant**

- *Why this is important:* All Capitol Region residents deserve the opportunity to have a high quality of life. Vibrant communities encourage this by offering a variety of cultural activities, active and passive recreational opportunities, plenty of access to natural areas, and interesting places and streets.
- *How complete streets help:* Streets that are safe and favorable for social interaction allow people of all ages, abilities, and backgrounds to live, work, and play in their communities without fear of harm or personal injury. Through a transportation network that equitably accommodates all modes, our region will reap the benefits of livability, public health, safety, affordability, and overall vibrancy.

**Vision: The Capitol Region will be Green**

- *Why this is important:* Complete streets encourage sustainable transportation modes, decreasing dependence on automobiles and contributing to reductions in harmful pollutants.
- *How complete streets help:* Complete streets will allow the region to maximize sustainability of both our built and natural areas by encouraging smart, compact development and shifting away from automobile dependence.

## **Policy Statement**

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CRCOG will continue to advance and support complete streets in the Capitol Region.

This policy will contribute to the State of Connecticut meeting the complete streets objectives established by state law (Connecticut General Statutes Sec. 13a-153f.) and the Complete Streets Policy of the Connecticut Department of Transportation (CTDOT).

This policy will be a living document, adapting to the Capitol Region’s needs as they change over time. While this policy is applicable at the regional level, member jurisdictions are encouraged to adopt and maintain local complete streets policies.

## **Modal Hierarchy and Accommodation of Diverse Users**

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### **Modal Hierarchy**

Through this policy, the region sets in motion a process for recalibrating transportation priorities to align with its vision. Our decision-making process will strive to protect those most vulnerable to harm, while accommodating a wide range of modes, by incorporating the modal hierarchy below.

The modal hierarchy is intended to align with civil rights and environmental justice principles by prioritizing transportation improvements for disadvantaged or underrepresented groups throughout the region. It recognizes that many people living in the CRCOG region lack regular or convenient access to an automobile. It also recognizes that many people who do have auto access would prefer to walk, bike, or take transit, acknowledging the benefits of those modes to a connected, competitive, vibrant, and green region.

The following modal hierarchy shall apply to all urban, town center, and village center place types and to all streets and roads where development ordinances or land use plans call for walkable or multimodal corridors.

1. People walking, in wheelchairs, or using other assistive devices
2. People taking transit
3. People biking
4. People moving goods for local delivery
5. People in personal automobiles accessing local destinations

For streets and roads in these land use contexts, to the extent possible, personal automobile through-traffic and goods movement that is not for local delivery should be discouraged.

On all other streets and roads, all modes shall be accommodated in a priority order that is appropriate for those facilities' current and future contexts.

The modal hierarchy is intended to serve as a general framework for planning and programming, including project application review, to encourage context-specific design solutions on individual corridors, with consideration of land use planning, public input, and relevant data. In other words, what constitutes a complete street in one area may look quite different than a complete street in another. However, regardless of context, there is a fundamental obligation to expand transportation options for the most vulnerable users of the system. The Design section below identifies the resources available to guide the accommodation of various users of the transportation system in different land use contexts.

### **Diverse People and Geographies**

Throughout the Capitol Region, a diverse group of people lives and travels through a wide range of community types and geographies. This policy and investments that follow will equitably

benefit people from all socioeconomic and geographic backgrounds, while emphasizing that improving travel choices for underrepresented and disadvantaged groups is critical.

## **Commitment in All Projects and Phases**

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### **All Projects**

All projects receiving funding through CRCOG, or submitted as candidates for State funding, must adhere to this policy. CRCOG will work with CTDOT to develop a process to consider the requirements of this policy when selecting projects for funding through the Transportation Improvement Program (TIP).

### **All Phases**

Consideration of the complete streets ethic will be built into projects from the beginning of project development and will persist through all phases. Project phases include planning, programming, environmental documentation, design, right-of-way acquisition, procurement/bidding, construction, construction engineering, reconstruction, and operations.

This policy also applies to the following:

1. All CRCOG planning activities that involve public rights-of-way, including the Metropolitan Transportation Plan
2. Any activities conducted by CRCOG to program federal funds for projects in the TIP. All TIP amendment requests should be required to provide information on how each project advances complete streets, unless the project has been granted an exception or otherwise does not relate to capital improvements within an existing or planned public right-of-way.

### **Construction Phase**

Vulnerable users, including bicyclists and pedestrians, and transit must be reasonably accommodated during the construction phase of projects.

# Exceptions

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## Criteria for Project Exceptions

Exceptions to this policy shall be considered on a project-by-project basis. The following list, which is not necessarily exhaustive, includes criteria and examples of potential exception conditions that CRCOG staff may use to inform decisions on exceptions.

- Projects where certain users are legally excluded, like controlled-access highways or pedestrian-only streets.
- Partial exceptions may apply to ensure projects consider all users that are not legally excluded. In these exceptions, a greater effort shall be made to accommodate the excluded users elsewhere.
- Projects for which there is already a parallel off-road facility, such as a multi-use path. This exception should not lead to an unreasonable detour for users to access destinations along the corridor with the project.
- Projects where no transit routes exist or are planned may be exempt from including transit accommodations.
- Projects where there is no existing or potential/expected demand for a particular user group
- Cost-prohibitive projects
  - Where a proponent is seeking an exception based on cost, a breakdown of the project cost with and without complete streets facilities is required.
- Where extreme topographical or natural resource constraints, or the need for excessive right-of-way acquisition, lead to disproportionate costs for including complete streets elements, or when there is a compelling reason that a complete streets element of a project must terminate prior to making a logical connection to the existing network for a particular mode
  - In these exceptions, greater effort to accommodate the excluded users elsewhere shall be made.

## Pre-application Information

In advance of soliciting project applications, CRCOG may hold a pre-application workshop to clarify complete streets requirements and potential exceptions.

## Applying for an Exception

Requests for exceptions should be submitted along with project applications. Applicants should cite at least one of the above exception criteria or make a comprehensive case for a different type of exception. Applicants may reference the Bicycle and Pedestrian Travel Needs Assessment (BPTNA) form (described below) to state the rationale for the exception.



## **Bicycle and Pedestrian Travel Needs Assessment (BPTNA) Form**

All project applications shall include a completed CTDOT Bicycle and Pedestrian Travel Needs Assessment (BPTNA) form.

In reviewing bicycle and pedestrian needs, high priority shall be placed on projects that fill gaps where no facilities exist and where there is strong existing or estimated latent demand, or where existing facilities are severely deteriorated or substandard.

Reviews of bicycle and pedestrian needs should acknowledge that demand may be low because existing conditions dissuade people from choosing these modes. Enhancing conditions for walking and bicycling can generate new demand as perceptions about safety and convenience are improved.

### **Decision**

A decision for an exception from the complete streets requirements of this policy will be made by CRCOG staff. A project that does not sufficiently incorporate complete streets elements and has not been granted an exception may be determined to be ineligible to receive funding for the program to which it has been applied. This determination may be made after the ranking of all projects.

The Transportation Committee will approve exceptions as part of its approval of overall programs of projects. The Policy Board retains the authority to override the decision.

### **Communication**

All exceptions shall be represented by a publicly-available document indicating the basis for granting an exception. Documentation can be in the form of the exception being recorded in approved minutes of the Transportation Committee, or a Policy Board resolution.

## **Jurisdiction**

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### **Process for Implementing Complete Streets Across Multiple Jurisdictions**

Projects that span multiple jurisdictions may require careful coordination and collaboration to plan, design, and implement. The Metropolitan Transportation Plan (MTP) – formerly the Long Range Transportation Plan (LRTP) – is an important planning process for coordination at an early stage of a multi-jurisdictional project. Where projects logically cross jurisdictional boundaries, or where projects terminate at the boundary of an adjacent jurisdiction, CRCOG will facilitate the sharing of information and collaboration among the two or more jurisdictions as early in the process as possible.

CRCOG will encourage municipalities to take on regionally-significant projects by preparing a reference guide for municipalities that will identify and clarify the process for completing projects that touch or are along state-owned streets.

### **Courtesy Review**

Municipalities are encouraged to invite representatives from neighboring jurisdictions to review project plans that terminate at or come within 500 feet of a jurisdictional boundary.

### **Interagency Coordination**

For all projects, jurisdictions should consult with multiple agencies before applying for CRCOG-allocated funds. The agencies to be consulted will vary based on the specifics of each project.

### **Land Use Referral and Regulations**

Under state law, notifications and opportunities for review and comment must be given to regional councils of governments for updates to municipal POCDs, certain zoning map and text amendments, and proposed subdivisions. These referrals may afford CRCOG and the municipality an opportunity to formally communicate on opportunities to support complete streets policies and the construction of complete streets elements as part of new development.

CRCOG's member jurisdictions are encouraged to review their zoning and subdivision regulations for opportunities to better integrate complete streets requirements. Several resources, including CRCOG's Sustainable Land Use Code project, can assist communities in such a review.

### **Connecticut Department of Transportation (CTDOT) Coordination**

CRCOG recognizes that CTDOT is an important partner in complete streets and that CTDOT has committed to complete streets across the state through its Complete Streets Policy. CTDOT is encouraged to continue incorporating complete streets into all projects and to closely coordinate with municipalities, throughout the project development process, on projects located within or near those respective municipalities' limits. Strong coordination between CTDOT and CRCOG will benefit the region's ability to deliver complete streets projects. CTDOT is encouraged to hold routine consultations with CRCOG on complete streets opportunities relating to STP-Urban and other projects using state or federal funding.

## Design

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### Complete Streets Design Approach

As of the effective date of this policy, a complete streets design approach is the preferred approach for the Capitol Region.

### Municipal Design Standards

CRCOG encourages local partners to evaluate their municipal design guidelines and engineering standards to align them with complete streets best practices and this policy's modal hierarchy.

### Education and Training

CRCOG will promote the complete streets design approach by providing education and training opportunities for both CRCOG staff and municipal staff.

### Context-specific Design

Street design will be context-specific. Projects in rural areas should accommodate all users in a way that fits with a rural context. Logical project termini shall be chosen to include connections through challenging design areas, such as overpasses, rail crossings, bridges, or unsafe intersections. Projects shall not terminate before such obstacles unless there is a compelling reason to do so.

Projects seeking to terminate before a challenge area must receive an exception. (See the "Exceptions" section.)

### Green Infrastructure and Aesthetics

Where appropriate, "green" infrastructure – such as storm water best management practices (BMPs) – public art, and other aesthetic features should be considered for projects.

### Design Guidelines

As of the effective date of this policy, the best and latest adopted or accepted design guidance shall be followed for all projects. Recognizing the breadth of community types in the Capitol Region and the value of consensus, CRCOG may convene its member communities to review and adopt regionally-accepted best practice guidelines, beginning with the list provided below. Best practice design guidelines will be revisited by CRCOG and its member communities at least once every three years to modify or add to the list of recommended design guidelines and keep abreast of changing best practices and standards.

Project designs receiving CRCOG-allocated funds shall adhere to FHWA and-or CTDOT requirements, as necessary, but may include treatments that can be piloted through the

MUTCD experimentation process. Innovative design options that provide an additional level of safety and comfort for vulnerable users are encouraged.

### *Quick-Build and Temporary Complete Streets Projects*

CRCOG supports and encourages use of temporary or quick-build materials to test designs or rapidly install complete streets designs without major reconstruction in the short-term.

### *CRCOG-supported Design Standards and Guidelines*

- American Association of State Highway and Transportation Officials (AASHTO)
  - Guide for the Planning, Designing, and Operation Pedestrian Facilities
  - Guide for the Development of Bicycle Facilities
  - Policy on Geometric Design of Highways and Streets (Green Book)
- Federal Highway Administration (FHWA)
  - Separated Bike Lane Planning and Design Guide
  - Achieving Multimodal Networks: Applying Design Flexibility & Reducing Conflicts
- National Association of City Transportation Officials (NACTO)
  - Urban Street Design Guide
  - Transit Street Design Guide
  - Urban Bikeway Design Guide
- Manual on Uniform Traffic Control Devices (MUTCD)
- U.S. Access Board
  - USDOT ADA Standards
  - Proposed Accessibility Guidelines for Pedestrian Facilities in the Public Right-of-Way (PROWAG)
- Connecticut Department of Transportation (CTDOT)
  - Highway Design Manual
  - Bridge Design Manual
  - Drainage Manual
  - Utility Accommodation Manual
  - Traffic Control Signal Design Manual
- Local Design Guidelines

## **Land Use and Context Sensitivity**

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### **Evaluating Needs and Potential of Streets**

#### *Context Sensitivity*

The challenge of building context-sensitive complete streets is magnified at the regional level, where the range of land use contexts is likely to vary significantly more than within a single municipality. Land use contexts in the CRCOG region vary from urban cores to rural landscapes.

Each project needs a review of context and the subject area's role within a community and larger regional network. Through evaluation of the existing and expected future conditions around a project area, complete street design alternatives may be developed.

### *Network Map*

Each project should be reviewed for how it contributes to the regional complete streets network vision as shown on the approved Network Map. The Network Map shows where complete streets should be prioritized within the regional transportation system and across different place types.

A nearby, parallel complete street does not preclude safety enhancements or inclusion of facilities for a diverse group of users in a given project.

### *Existing Conditions*

Existing crash history, land use, zoning, density of residents and uses, modal usage, and space constraints, are to be examined as part of every project to evaluate the needs of all users on a given street and to determine appropriate design treatments.

### *Future Conditions*

Future or potential land use, zoning, density of residents and uses, modal usage, and space constraints, as determined by growth patterns, planning documents, and projections, are to be examined to anticipate future needs and potential of all users on a given street and to determine appropriate design treatments.

## **Responding to Context**

The modal hierarchy established in this policy protects those users of the transportation system most vulnerable to harm. The modal hierarchy shall be considered in project designs, understanding that a complete street in one location may have entirely different design components than a complete street in a different location.

Different design treatments will be appropriate depending on the land use, transportation network needs, and space constraints. For example:

- On streets with higher motor vehicle speeds and/or volumes:
  - For bicycle facilities, physical separation between bicycle facilities and general travel lanes is preferred
  - Pedestrian facilities should be buffered from general travel lanes by context-sensitive elements such as a planting strip or "furniture zone".
- Streets that need to accommodate buses or large trucks may need to more heavily consider the effects of lane widths.
- Streets with higher land use density should accommodate higher pedestrian volumes.
- Streets in rural town centers that are designed for slow speed may not need separated bicycle facilities.

- Well-designed streetscape improvements can change the context of the street through placemaking, making it more walkable and human-centered.

## Performance Measures

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### Performance Tracking

CRCOG will work with its 38 member communities to track and measure how well the region is meeting its complete streets vision on an annual basis. Performance measures, where applicable, will be compared against future targets to be established by CRCOG. Annual reports of all performance measures will be publicly available on the CRCOG website and will be distributed to the member communities for wider distribution. Performance metrics will be used to update this policy and associated processes as needed.

In addition to CRCOG's performance measures, CRCOG encourages communities receiving CRCOG-allocated funds to complete before/after performance tracking and reporting.

### Example Performance Measures

CRCOG and its member communities should partner on tracking progress toward complete streets, starting with existing data and expanding to the extent that agency capacity exists to collect and analyze additional data. Performance tracking can also be integrated as needed into CRCOG's MTP process. Example performance measures are included in the Appendix.

## Project Selection Criteria

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### Overall Approach

CRCOG will embed complete streets into the day-to-day processes of the organization, including project selection criteria.

### Funding Programs

This policy will apply to **all programs** managed by CRCOG, including the Local Transportation Capital Improvement Program (LOTICIP).

Municipalities are also encouraged to apply a complete streets approach for projects submitted to State competitive programs. These programs include STP-Urban, TA-Set Aside, and CMAQ.

## *FTA Funding Programs*

Various FTA formula programs, including Section 5307, 5310, 5311, 5337, and 5339, provide funds across the state for transit capital and operating assistance. These programs fund a wide variety of eligible activities, many of which do not apply to capital projects within the public right-of-way but are nevertheless part of providing frequent, reliable, and quality transit service to Connecticut residents. This policy encourages the consideration of complete streets for applicable projects funded by these FTA formula programs.

The region already has a recent example of strategic incorporation of bicycle and pedestrian facilities in a transit project. As stated in the POCD (Ch. 10):

...if transportation projects are viewed as opportunities to improve bicycle and pedestrian access and safety, the region will quickly make progress. CT **fastrak** provides a good example of this principle in action – because of a request from CRCOG during the planning phase, the busway will include a multi-use path that parallels the busway from New Britain to Newington Junction.

The project, since built, has greatly improved transportation options for transit users, bicyclists, and pedestrians. This same approach of seeking opportunities to improve other modes within otherwise single-mode projects is at the heart of complete streets and is an important consideration for future transit projects included in the TIP.

## *Vendor-In-Place Paving Program*

CTDOT maintains the Vendor-In-Place (VIP) Paving Program, which CRCOG has recognized as an opportunity for creating new space for multimodal travel through restriping after repaving. CTDOT and CRCOG should continue coordination with local communities for VIP projects that overlap with existing or planned bicycle routes.

## **Project Selection Criteria**

Each program has distinct project selection criteria as developed by the CRCOG Transportation Committee. CRCOG will establish or refine complete streets rating criteria to support the objectives of this policy, including quantitative metrics. LOTCIP criteria should be updated to give greater weight to projects that promote safety and equity, fulfill existing or latent demand, and upgrade facilities for all modes, with an emphasis on walking, cycling, and transit use, such that complete streets criteria should account for at least 15 percent of the total points. At least one point should be awarded for projects whose proponents have locally adopted complete streets ordinances or policies.

## *Promoting Equity in Project Selection*

For each programming cycle, CRCOG will promote equity through project selection criteria by establishing a minimum overall program funding percentage of at least one-quarter (25 percent) for projects with direct benefits to environmental justice communities.

## *Construction Phase*

All projects funded with CRCOG-allocated funds will be required to demonstrate how safe access for all modes will be preserved over the course of construction, including, where necessary, designated detours that are convenient for users.

## **Implementation Steps**

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The following implementation timelines start at the adoption of the policy.

Within six months, CRCOG will develop a fact sheet on the policy for member communities.

Within one year, and at least annually thereafter, CRCOG will hold one internal training for CRCOG staff on the policy and complete streets design best practices.

CRCOG staff will review existing CRCOG policies, programs, and processes for consistency with this policy. Within two years, conflicting policies or processes will be reconciled with the policy.

Within two years, CRCOG will establish a baseline and targets for the identified complete streets performance measures. CRCOG will:

- Identify a department or position to lead the tracking and reporting of performance measures on an annual basis
- Develop annual reports, maintain an online dashboard, or implement a similar method for documenting performance measure progress on an annual basis
- Meet annually to review performance of the past year
- Meet at least every two years to identify and draft changes to the policy based on performance
- Integrate complete streets performance measure tracking into other planning processes as appropriate.

Within two years, and at least annually thereafter, CRCOG will hold at least one external training, for member jurisdiction staff and other interested stakeholders, on the policy, how to adopt a local policy, and design best practices.

Within three years, CRCOG will review best practice guidelines and develop a CRCOG-preferred list of design guidelines that CRCOG-funded projects should follow.

Within three years, CRCOG will review the criteria for exceptions and project prioritization process with respect to complete streets to determine if modifications are necessary.