

October 30, 2020

Ms. Kimberly Lesay, Bureau Chief of Policy & Planning  
Mr. Scott Hill, Chief Engineer and Bureau Chief of Engineering & Construction  
Connecticut Department of Transportation  
2800 Berlin Turnpike  
PO Box 317546  
Newington, CT 06131-7546

**Re: CRCOG Staff Comments on CTDOT Draft 5-year Capital Plan (FY2021-2025)**

Dear Ms. Lesay and Mr. Hill,

We appreciate the Connecticut Department of Transportation's (CTDOT) coordination of the Draft 5-year Capital Plan (FY2021-2025) for preliminary review by the Capitol Region Council of Governments (CRCOG) and other Metropolitan Planning Organizations (MPOs). We are pleased to see that many projects within the draft Capital Plan are consistent with CRCOG's Metropolitan Transportation Plan. However, we are very concerned that substantial projects that were identified for funding under the FY2020-2024 Capital Plan have been moved to the "Overprogramming" category in the current draft Plan. This represents a disproportionate loss of critical projects in the Capitol Region, as five of the nine displaced transit projects are improvements to the *CTrail* Hartford Line within CRCOG's region.

Provided below are CRCOG's staff-level comments on the Draft 5-year Capital Plan. We will share these comments with our municipalities and look forward to meeting with CTDOT staff to coordinate further at our annual STBG Coordination Meeting on November 17, 2020.

- As noted in our comment letter on last year's draft Capital Plan, "prior to the cutting of any projects in our region, CRCOG would like to meet with CTDOT to discuss project prioritization and potential mitigation measures." Therefore, we would like to discuss the movement of any Capitol Region projects to "Overprogramming" before the FY2021-2025 Capital Plan is finalized.
- This draft Capital Plan disproportionately eliminates transit projects in the Capitol Region. We strongly feel that the loss of funding should be more equitably dispersed across the State. Therefore, we recommend that, at a minimum, funding be reallocated so that the Hartford Line track improvements included in Phase 3b are programmed within this Capital Plan.
- While we appreciate the opportunity to review and comment upon the draft 5-year Capital Plan, the process allotted for MPO review is insufficient. There is a need to improve the system for development and review of the Capital Plan. An earlier, more collaborative, and transparent process that includes robust regional input is needed. The MPOs must be more

involved in project selection and programming and considered a true partner in the federal transportation program.

- As we strive to implement a Performance-Based Planning and Programming approach towards transportation capital investments, projects entering the TIP and STIP (via the 5-year Capital Plan) will need to aim to achieve performance targets. CRCOG remains interested in working with CTDOT to evaluate methodologies that further link investments to performance and to develop an appropriate project prioritization process. As we move forward, it will be important to determine how best to utilize performance measures as a means of justification for project selection.
- In addition to using federally mandated performance measures, there is also a need to consider environmental impacts as well as economic analysis when selecting and prioritizing projects for funding. There is a need for consistency and enhancement in the utilization of economic analysis for all large projects.

Please feel free to contact me with any questions, comments, or concerns. We look forward to your responses.

Sincerely,



Lyle D. Wray  
Executive Director

cc: Richard Andreski, CTDOT Bureau Chief of Public Transportation  
Maribeth Wojenski, CTDOT Transportation Assistant Planning Director  
Grayson Wright, CTDOT Transportation Planner 2  
Marcia Leclerc, CRCOG Policy Board Chair  
Jonathan Colman, CRCOG Transportation Committee Chair  
Robert Aloise, CRCOG Director of Planning  
Cara Radzins, CRCOG Transportation Deputy