

January 12, 2022

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 (FY2022-2026)

Dear Ms. Lesay and Mr. Hill,

We appreciate the Connecticut Department of Transportation's (CTDOT) coordination of the Draft 5-year Capital Plan (FY2022-2026) for preliminary review by the Capitol Region Council of Governments (CRCOG) and other Metropolitan Planning Organizations (MPOs). We're aware this draft plan does not account for new federal funding increases, however given these increases are imminent we look forward to working with CTDOT to ensure that additional projects that address region's needs are programmed within this Capital Plan's timeframe.

Provided below are CRCOG's staff-level comments on the plan, which are also attached in the requested table format. We will share these comments with our municipalities and look forward to coordinating with CTDOT regarding additional upcoming Capital Planning and Programming efforts.

- Due to the upcoming influx of federal transportation funding, CRCOG proposes holding regular meetings with CTDOT to help identify additional project priorities within the region, leverage each agency's planning and performance management efforts, assess grant opportunities, and review the new federal funding programs and opportunities.
- Over the past two years, the draft Capital Plan has disproportionately impacted transit projects within the Capitol Region. Beginning with the 2021-2025 Capital Plan, five of the nine displaced transit projects moved into "overprogramming" were *CTrail* Hartford Line improvements within CRCOG. Given the upcoming influx of federal funds, it's critical that funding for these projects be restored within the timeframe of this Capital Plan.
- To best position Connecticut for increased capital expenditures, CTDOT should consider immediately initiating all projects that were on-hold awaiting additional programmatic funding to accumulate, such as the projects selected by regions in the 2019 Transportation Alternative Set-Aside solicitation.
- While we appreciate the opportunity to review and comment upon the draft 5-year Capital Plan, the timeframe and process allotted for MPO review is insufficient. An earlier, more collaborative, and more 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 equity and 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 these analyses for all large projects.

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

Sincerely,



Pauline Yoder
Acting Executive Director

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