

March 7, 2022

Esteemed Chairs Cohen and Gresko, Haskell and Lemar,
Members of the Environment and Transportation Committees:

The Western Connecticut Council of Governments (WestCOG) appreciates the opportunity to comment on Senate Bill 4, *An Act Concerning the Clean Air Act*.

WestCOG **supports** funding the modernization of traffic signals. This is cost-effective move that can pay outsize dividends in congestion relief, reduced greenhouse gas emissions, and improved air quality and safety. A comprehensive traffic signal optimization project WestCOG greenlighted in Stamford reduced travel times by up to 40% and helped reduce traffic fatalities significantly.

However, rather than creating a new, standalone program from scratch, WestCOG asks that your Committees add signal funding to an existing program. WestCOG would recommend that you add this funding to the successful LOTCIP program as a set-aside. Doing so will:

- Accelerate project delivery and reduce administrative burden. Traffic signal replacement is already eligible under LOTCIP; directing this funding into LOTCIP eliminates the time necessary to develop and roll out and the overhead of managing a new program.
- Avoid forcing project sponsors to choose between funding programs¹. WestCOG's experience is that project sponsors will eschew programs that disallow certain project costs in favor of programs that cover all costs. Our expectation is that a project sponsor with a project that includes a signal replacement and even a small non-signal component (say, a sliver taking to ease right turns on red) would likely eschew a dedicated signal program in favor of LOTCIP so that non-signal component is funded. Many signal projects include costs beyond the signal and associated hardware.
- Provide for regional evaluation, prioritization, and selection of concepts, so that state funds are directed to projects of regional significance and maximum benefit to the state.

With respect to electric vehicle (EV) rebates: WestCOG suggests that your Committees:

- Review the bill language to ensure that opportunities to 'game' the system are not available. As drafted, the bill does not appear to limit the number of rebates a person is entitled to; this could yield rebate claims that may not advance public goals (e.g., circular sales between two individuals; car dealers collecting a rebate on a trade-in). These risks only pertain to the sales of used cars and may in part explain why rebates are generally applied only to new vehicles.
- Evaluate whether rebates are an efficient and effective method to expand EV use. Due to high demand and supply chain problems – manufacturers are unable to meet demand – rebates may not result in any additional sales and instead lead sellers to raise prices by an amount equivalent to the rebate. In a situation of limited supply, demand-side incentives can be counterproductive. What can Connecticut do to increase the supply of EVs?

Should you have questions, please do not hesitate to contact me.

Thank you for your consideration.

A handwritten signature in black ink that reads "Francis R. Pickering". The signature is written in a cursive style with a prominent horizontal line underlining the name.

Francis R. Pickering
Executive Director

ⁱ Note that dual funding of projects is possible in theory but in practice is often unworkable.