



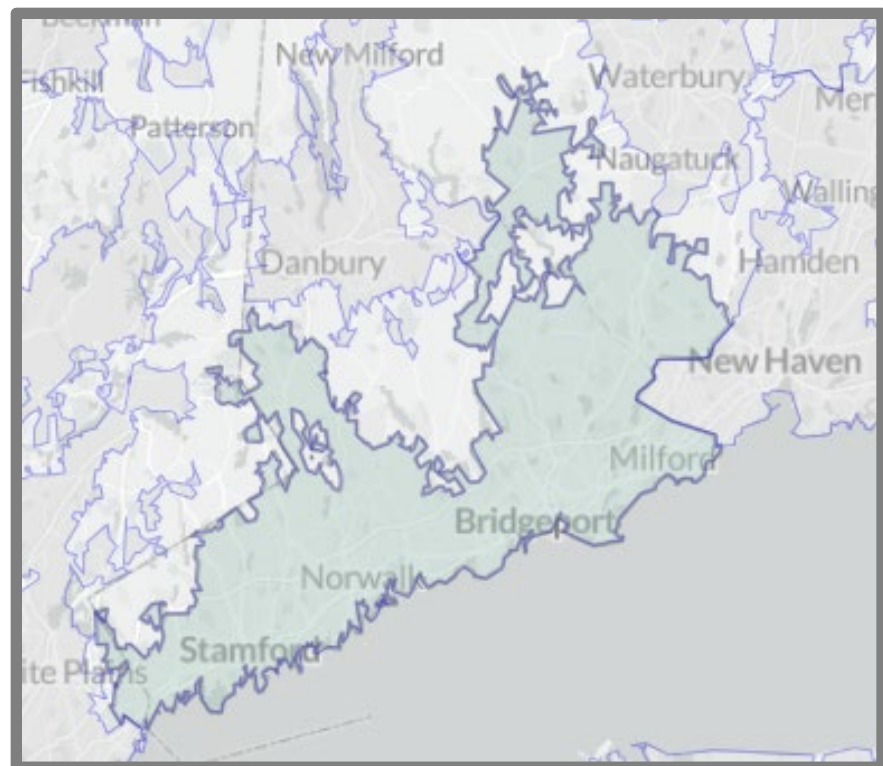
U.S. Department
of Transportation

Transportation Management Area Planning Certification Review

Federal Highway
Administration

Federal Transit
Administration

Bridgeport-Stamford, CT Transportation Management Area



July 12, 2022





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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 Bridgeport-Stamford, Connecticut urbanized area through a series of virtual meetings held on April 4, 5, 6 and 7, 2022 in lieu of an on-site meeting. 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 Connecticut Department of Transportation (CTDOT), the South Western Region Metropolitan Planning Organization (SWRMPO), the Greater Bridgeport Valley MPO (GBVMPO), and the providers of public transportation, subject to resolving the 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.

Details of the certification findings for each of the below items are contained in this report.

A summary of corrective actions is shown in the below table.

South Western Region MPO	
Review Area	Corrective Action
1. Metropolitan Transportation Plan	The MTP is required to consider the current and projected transportation demand of persons and goods in the metro planning area over the period of the transportation plan (23 CFR 450.324(f)). In addition, the Bipartisan Infrastructure Law (BIL) enhances the requirements for ensuring consistent data is used when more than one MPO serves the same urbanized areas, including population and employment data and forecasts. For the next update of the MTP, SWRMPO must collaborate with the CTDOT, the statewide Travel Demand Model, and within the TMA to ensure the plan has a solid baseline of assumptions and forecasts for population, employment and traffic demand. The updated MTP, including appropriate data and forecasts, must be completed by May 1, 2023.



Review Area	Corrective Action
2. Congestion Management Process / Management and Operations	SWRMPO must prepare a CMP that meets 23 U.S.C. 134(k)(3) and 23 CFR 450.322. It is strongly recommended that SWRMPO follow the eight elements of a CMP as outlined in the <i>Congestion Management Process: A Guidebook</i> (April 2011) developed by FHWA. The CMP must be completed by May 1, 2023, and coordinated with the 2023 update of the MTP. In addition, detailed tasks related to the CMP development, and related performance management activities, must be amended in the current UPWP (FY2022 and FY2023). SWRMPO may want to assess if the scope of work associated with the conceptual congestion reduction projects warrants revision, to better align with federal regulations.
3. Congestion Management Process / Management and Operations	SWRMPO must coordinate their CMP efforts within the TMA, cooperatively developing and implementing it with GBVMPO by May 1, 2023. Specifics as to how the coordination, development of methodologies, and how implementation will be accomplished should be included in the CMP.

Greater Bridgeport Valley MPO	
Review Area	Corrective Action
1. Metropolitan Transportation Plan	The MTP is required to consider the current and projected transportation demand of persons and goods in the metro planning area over the period of the transportation plan (23 CFR 450.324(f)). In addition, BIL enhances the requirements for ensuring consistent data is used when more than one MPO serves the same urbanized areas, including population and employment data and forecasts. For the next update of the MTP, GBVMPO must collaborate with the CTDOT, the statewide Travel Demand Model, and within the TMA to ensure the plan has a solid baseline of assumptions and forecasts for population, employment and traffic demand. The updated MTP, including appropriate data and forecasts, must be completed by May 1, 2023.
2. Transportation Improvement Program	The MPO must upload the FFY2021 Obligated Project Listing to the MetroCOG website to comply with 23 CFR 450.334. The FY2021 listing must be posted by September 1, 2022. All future listings must be posted within 90 days of the end of the fiscal year. <i>(This item was addressed and completed prior to issuance of the final document.)</i>



Review Area	Corrective Action
3. Congestion Management Process / Management and Operations	GBVMPO must coordinate their CMP efforts within the TMA, cooperatively developing and implementing it with SWRMPO by May 1, 2023. Specifics as to how the coordination, development of methodologies, and how implementation will be accomplished should be included in the CMP.

Bridgeport Stamford TMA	
Review Area	Corrective Action
1. TMA Coordination	The MPOs must ensure collaboration meetings within the TMA occur on a regular basis, annually at a minimum. WestCOG and MetroCOG/NVCOG staff may consider alternating who facilitates the meeting and invite FHWA/FTA officials. The agenda should include a review of each other’s planning programs and an identification of projects or programs of mutual interest. The first coordination meeting must be held by October 31, 2022.

A summary of recommendations is shown in the below tables.

South Western Region MPO	
Review Area	Recommendation
1. MPO Structure and Agreements	WestCOG, SWRMPO, and CTDOT should work together to ensure the state transportation official to the MPO board is well-defined, engaged, and participating in the MPO in a beneficial manner.
2. MPO Structure and Agreements	The MPO should consider amending their bylaws or developing other documentation to better clarify roles, responsibilities and composition of the TAG. If the TAG is intended to be primarily an informal forum for municipal staffs to discuss items of common interest that should be documented, and if the TAG is intended to be advisory to the MPO that should be acknowledged.
3. MPO Structure and Agreements	WestCOG should consider assessing TAG membership to determine if participation by additional organizations could benefit the metropolitan planning process. This committee offers a forum for cooperative planning and information sharing to inform decision making. WestCOG is encouraged to consider additional participants that can assist in creating a safe, multi-modal, equitable, sustainable transportation system. Published documents and website materials should be updated to appropriately reflect membership.



Review Area	Recommendation
4. Financial Planning	The federal team understands the collaboration between CTDOT and the MPOs as it relates to financial projections for the MTP. However, the MTP must clearly demonstrate that sufficient revenues are anticipated to be available to meet the anticipated costs of the proposed projects. The MTP should demonstrate fiscal constraint by describing in detail the apportionment formula used to determine the amount of funding the MPO anticipates for the region. Additionally, the MPO should convert revenues into YOE and indicate in the list of projects the YOE.
5. Financial Planning	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.
6. Financial Planning	The MPO should take a more active role in the development of the financial plan and better document its coordination with CTDOT and local transit providers. The Financial Plan should indicate if transit providers in the region have sufficient funding to meet operate and maintain all services and facilities under their control.
7. Financial Planning	Within the MTP Financial Plan, the MPO should consider including more details in the project description as well as grouping the projects by Preservation, Improvement or Major Project categories.
8. Metropolitan Transportation Plan	The MPO should consider expanding on their methodology and process for equitable distribution of prioritized projects throughout the region in the 2023 update of the MTP. This will ensure stakeholders are aware of how projects are selected as well as ensure projects are equitably distributed.
9. Transportation Improvement Program	CTDOT and the MPO should work cooperatively to assess if the TIP and STIP revision procedures from 2010 included in CTDOT's <i>Handbook</i> are still appropriate or if updates are needed. Additionally, it is recommended that CTDOT and the MPO consider how eSTIP processes should be reflected in the revision procedures. CTDOT and the MPOs should also ensure that the revision process is transparent and available as public information.
10. Transportation Improvement Program	The MPO should ensure the current TIP, including any adopted amendments, can be easily found online and that the TIP document is annotated with a revision date every time it is updated.



Review Area	Recommendation
11. Transportation Improvement Program	A disposition of public comments received on the TIP should be included as part of the final TIP document, to comply with the MPO's Public Participation Plan.
12. Transit Planning	The MPO and public transportation providers should develop a strategy for coordination to ensure all parties are regularly sharing data and other information that may be of use to the other parties.
13. Transit Planning	The MPO should seek ways to consider the role that intercity buses may play in reducing congestion, pollution, and energy consumption in a cost-effective manner and strategies and investments that preserve and enhance intercity bus systems, including systems that are privately owned and operated.
14. Transit Planning	It is recommended that the MPO work closely with the region's transit providers to evaluate ridership and trends as the COVID-19 pandemic subsides. The MPO and their transit partners should consider surveys to better understand how the pandemic has impacted ridership and to ensure the existing level of service is appropriate to meet the demands of the public.
15. Civil Rights	EJ: To be consistent with the Executive Order on EJ, the MPO will need to conduct a benefit 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 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. Staff is recommended to take the virtual NHI Fundamentals of EJ class (course number FHWA-NHI-142074) to understand the basics of EJ and to document the analysis in the TIP and MTP.
16. Civil Rights	Executive Orders 14008 and 13985: The MPO staff should increase its awareness of the two Executive Orders, EO 14008 and EO 13985 and prepare for the rollout by attending webinars and other virtual meetings as they become available.
17. Civil Rights	ADA: The MPO should continue their coordination with CTDOT in educating municipalities on their responsibilities under ADA and Section 504 and send a summary of the Municipal ADA Assessments to FHWA/FTA annually.



Review Area	Recommendation
18. Civil Rights	ADA: The MPO should assess how they communicate with disabled persons. Alternative communication methods such as TTY (Teletypewriter) and TDD (Telecommunication Device for the Deaf) and relay services that will allow the hearing-impaired individual to communicate through the telephone to receive information from the MPO should be considered. In addition, the MPO will need to provide alternative formats for written documentation and ensure accessibility for electronic communication for individuals with disabilities. As discussed at the certification review, CTDOT is willing to provide technical assistance on the alternative formats to communicate with people with disabilities.
19. Civil Rights	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.
20. Transportation Safety and Security	SWRMPO is encouraged to develop a documented approach on how safety is considered as part of their project selection process. The specific uses of the RTSP in this process could be further defined to ensure limited resources are focused on addressing safety on all projects. This documented approach should also consider the specific goals (e.g., reduction of fatalities, serious injuries, or all crashes) of the funding programs to ensure projects selected will support achievement of the safety performance targets.
21. Transportation Safety and Security	SWRMPO should plan for regular updates to the RTSP, and the associated strategy implementation contained therein. This may include coordinating with the CTDOT Safety Office to ensure the RTSP supports the safety targets and goals for the region.
22. Freight Planning	SWRMPO should start to put more emphasis on freight planning at a regional level, working to advance a freight profile illustrating commodity flows and major truck origins and destinations, at a minimum.
23. Freight Planning	Understanding that freight is and will be a growing source of congestion in southwest CT and federal regulations expand consultation requirements to include freight shippers as interested parties during MTP and TIP preparation, SWRMPO should provide opportunities for freight providers and stakeholders to participate in the transportation planning process. It is further recommended that outreach to freight stakeholders be include in the next update of the PPP.



Review Area	Recommendation
24. Performance Management	The TIP should include a description of how the anticipated effects of 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 help to meet the targets.
25. Congestion Management Process / Management and Operations	Consider implementation of a Traffic Incident Management committee or working group (as noted in the MTP) to focus on the causes, impacts, and quick clearance of incidents within the TMA.
26. Congestion Management Process / Management and Operations	SWRMPO should work collaboratively with CTDOT to update the Diversion Route plans. This may include identification of ITS / traffic signal technologies and digitizing the plans to support quicker and more efficient deployment of diversion responses when needed.
27. Congestion Management Process / Management and Operations	SWRMPO should update their website to ensure the 2018 Connecticut Statewide ITS Architecture is available. SWRMPO and CTDOT should also evaluate opportunities to collaborate on ITS initiatives and share information and data within the TMA.
28. Environmental Mitigation and Resiliency	Federal regulations require the MTP to include a discussion of the types of potential environmental mitigation activities and the potential areas to carry out these activities. The next update of the MTP should expand upon environmental mitigation activities that minimize the environmental impacts of transportation improvements (e.g., low-impact development, green infrastructure). The discussion may focus on policies, programs or strategies, rather than focus on the project level.
29. Environmental Mitigation and Resiliency	The MPO should look for ways to institutionalize consideration of resiliency needs and environmental mitigation opportunities throughout the planning process such as in planning studies, MTP development (including consultation with appropriate agencies), and project evaluation processes. This will better position the MPO to plan for a sustainable infrastructure system that works for all users, advance the transition to electric and other alternative fueled vehicles, and undertake actions to prepare for and adapt to the impacts of climate change.



Greater Bridgeport Valley MPO	
Review Area	Recommendation
1. MPO Structure and Agreements	MetroCOG, NVCOG, and GBVMPO should work together with CTDOT to ensure the state transportation official to the MPO board is well-defined, engaged, and participating in the MPO in a beneficial manner.
2. MPO Structure and Agreements	The MPO should consider amending their bylaws or developing other documentation to better clarify roles, responsibilities and composition of the TTACs. If the TTACs are intended to be primarily informal forums for municipal staffs to discuss items of common interest that should be documented, and if the TTACs are intended to be advisory to the MPO that should be acknowledged.
3. MPO Structure and Agreements	MetroCOG and NVCOG should consider assessing TTAC membership to determine if participation by additional organizations could benefit the metropolitan planning process. These committees offer a forum for cooperative planning and information sharing to inform decision making. MetroCOG and NVCOG are encouraged to consider additional participants that can assist in creating a safe, multi-modal, equitable, sustainable transportation system. Published documents and website materials should be updated to appropriately reflect membership.
4. Financial Planning	The MPO should convert costs into YOE and indicate in the list of projects the YOE.
5. Financial Planning	The MPO should take a more active role in the development of the financial plan and better document its coordination with CTDOT and local transit providers. The Financial Plan should indicate if transit providers in the region have sufficient funding to meet operate and maintain all services and facilities under their control.
6. Metropolitan Transportation Plan	The MPO should consider including a process for equitable distribution of prioritized projects throughout the region in the 2023 update of the MTP. This will ensure stakeholders are aware of how projects are selected as well as ensure projects are equitably distributed.



Review Area	Recommendation
7. Transportation Improvement Program	CTDOT and the MPO should work cooperatively to assess if the TIP and STIP revision procedures from 2010 included in CTDOT's <i>Handbook</i> are still appropriate or if updates are needed. Additionally, it is recommended that CTDOT and the MPO consider how eSTIP processes should be reflected in the revision procedures. CTDOT and the MPOs should also ensure that the revision process is transparent and available as public information.
8. Transportation Improvement Program	The MPO should ensure that amendments to the TIP are posted to the website shortly after MPO endorsement and that a TIP amendment date is included when the TIP is amended.
9. Transit Planning	The MPO and public transportation providers should develop a strategy for coordination to ensure all parties are regularly sharing data and other information that may be of use to the other parties.
10. Transit Planning	The MPO should seek ways to consider the role that intercity buses may play in reducing congestion, pollution, and energy consumption in a cost-effective manner and strategies and investments that preserve and enhance intercity bus systems, including systems that are privately owned and operated.
11. Transit Planning	It is recommended that the MPO work closely with the region's transit providers to evaluate ridership and trends as the COVID-19 pandemic subsides. The MPO and their transit partners should consider surveys to better understand how the pandemic has impacted ridership and to ensure the existing level of service is appropriate to meet the demands of the public.
12. Public Participation	An annual review and evaluation of the public involvement process, as stipulated in the Statement of Cooperative MPO/State/Transit Operators Planning Roles & Responsibilities of the UPWP, should be developed and included as a task in the next update of the UPWP.
13. Civil Rights	EJ: To be consistent with the Executive Order on EJ, the MPO will need to conduct a benefit 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 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. Staff is recommended to take the virtual NHI Fundamentals of EJ class (course number FHWA-NHI-142074) to understand the basics of EJ and to document the analysis in the TIP and MTP.



Review Area	Recommendation
14. Civil Rights	Executive Orders 14008 and 13985: The MPO staff should increase its awareness of the two Executive Orders, EO 14008 and EO 13985 and prepare for the rollout by attending webinars and other virtual meetings as they become available.
15. Civil Rights	ADA: The MPO should continue their coordination with CTDOT in educating municipalities on their responsibilities under ADA and Section 504 and send a summary of the Municipal ADA Assessments to FHWA/FTA annually.
16. Civil Rights	ADA: The MPO should assess how they communicate with disabled persons. Alternative communication methods such as TTY (Teletypewriter) and TDD (Telecommunication Device for the Deaf) and relay services that will allow the hearing-impaired individual to communicate through the telephone to receive information from the MPO should be considered. In addition, the MPO will need to provide alternative formats for written documentation and ensure accessibility for electronic communication for individuals with disabilities. As discussed at the certification review, CTDOT is willing to provide technical assistance on the alternative formats to communicate with people with disabilities.
17. Civil Rights	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.
18. Transportation Safety and Security	GBVMPO is encouraged to develop a documented approach on how safety is considered as part of their project selection process. The specific uses of the RTSP in this process could be further defined to ensure limited resources are focused on addressing safety on all projects. This documented approach should also consider the specific goals (e.g., reduction of fatalities, serious injuries, or all crashes) of the funding programs to ensure projects selected will support achievement of the safety performance targets.



Review Area	Recommendation
19. Transportation Safety and Security	GBVMPO should consider coordinating with CTDOT and the T2 Center on the potential uses of the CT Roadway Safety Management System (CRSMS) application. The CRSMS application can support safety project identification efforts, as well as benefit-cost analysis, project prioritization, and safety effectiveness evaluations. The use of the CRSMS modules can support the decision making on which safety projects will be most effective in achieving their safety-related objectives, as well as potential safety benefits from other projects that are not solely focused on safety.
20. Freight Planning	GBVMPO should start to put more emphasis on freight planning at a regional level, working to advance a freight profile illustrating commodity flows and major truck origins and destinations, at a minimum. It is recommended that MetroCOG coordinate with NVCOG to understand available StreetLight Data analytics within the MPO.
21. Performance Management	The TIP should include a description of how the anticipated effects of 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 help to meet the targets.
22. Congestion Management Process / Management and Operations	GBVMPO should work collaboratively with CTDOT to update the Diversion Route plans. This may include identification of ITS / traffic signal technologies and digitizing the plans to support quicker and more efficient deployment of diversion responses when needed.
23. Congestion Management Process / Management and Operations	GBVMPO should update their website to ensure the 2018 Connecticut Statewide ITS Architecture is available. GBVMPO and CTDOT should also evaluate opportunities to collaborate on ITS initiatives and share information and data within the TMA.



Review Area	Recommendation
24. Environmental Mitigation and Resiliency	The MPO should look for ways to institutionalize consideration of resiliency needs and environmental mitigation opportunities throughout the planning process such as in planning studies, MTP development (including consultation with appropriate agencies), and project evaluation processes. This will better position the MPO to plan for a sustainable infrastructure system that works for all users, advance the transition to electric and other alternative fueled vehicles, and undertake actions to prepare for and adapt to the impacts of climate change.

A summary of commendations is shown in the below table.

South Western Region MPO	
Review Area	Commendation
1. Public Participation	SWRMPO is commended for their outreach efforts and approach to engaging public input. The multiple listening sessions for the MTP, held at different times throughout the day in varying communities, was comprehensive. The MPO also does a good job using social media, virtual tools and other platforms (e.g., newsletters) to engage the public and other regional stakeholders.
2. Transportation Safety and Security	WestCOG is commended for their active participation and engagement with the SHSP Steering Committee and the T2 Center’s Safety Circuit Rider Advisory Committee.

Greater Bridgeport Valley MPO	
Review Area	Commendation
1. Transportation Improvement Program	GBVMPO is commended for their leadership in collaborating with CTDOT to address programming and project prioritization, leading to the Lean Process that DOT hosted in June 2022.
2. Public Participation	GBVMPO is commended for their outreach efforts and approach to engaging public input, particularly with their development of a StoryMap for the TIP. The MPO also does a good job using other platforms to engage the public and other stakeholders.
3. Transportation Safety and Security	MetroCOG is commended for the initiation of a Miovision program within the region. This proactive approach to supporting more in-depth analysis of traffic and safety conditions is commended.



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. 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(s) 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 each metropolitan planning area. 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, 49 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 South Western Region MPO and the Greater Bridgeport Valley MPO are the designated MPOs for the Bridgeport-Stamford urbanized area. There are small areas of other towns in Connecticut and New York that include portions of the Bridgeport-Stamford urbanized area, and these areas are served by other MPOs. The Connecticut Department of Transportation (CTDOT) is the responsible State agency and Metro-North Railroad, *CTtransit*, Norwalk Transit District (NTD), Greater Bridgeport Transit (GBT), and Valley Transit District (VTD) are the primary public transportation operators within the TMA.

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.



3.0 SCOPE AND METHODOLOGY

3.1 Review Process

Participants in the review included representatives of FHWA, FTA, CTDOT, GBT, and MPO staff. A full list of participants is included in Appendix A, along with copies of the agendas for virtual meetings which were held April 4-7, 2022. Opportunities for public comment were provided via virtual meetings held on March 31 and April 12, 2022, and input from MPO members and technical advisory committee members was also solicited. Written comments were also accepted through email and regular mail submittals.

A desk audit of current documents and correspondence was completed prior to the virtual 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.

3.2 Documents Reviewed

A number of documents, agreements, and materials (e.g., SWRMPO and GBVMPO websites, key documents) were consulted and assessed for conformity with federal regulations. The following list summarizes a few of the key MPO documents that were reviewed and considered during this certification review.

- TMA and MPO Agreements and By-Laws
- FY 2022 and 2023 Unified Planning Work Programs
- SWRMPO 2019-2045 Long-Range Transportation Plan (April 2019)



- GBVMPO 2019-2045 Metropolitan Transportation Plan (March 2019)
- SWRMPO Transportation Improvement Program 2021-2024 (October 2020, amended)
- GBVMPO Transportation Improvement Program 2021-2024 (October 2020, amended)
- SWRMPO Title VI, Civil Rights, and Public Participation Plan (December 2016)
- SWRMPO Language Assistance Plan (2019)
- GBVMPO Public Participation Plan (October 2018)
- MetroCOG/GBVMPO Title VI Program & Limited English Proficiency Plan (October 2018)
- Western Connecticut COG Congestion Management Process (2014)
- GBVMPO Congestion Management Process (2018)
- Regional Transportation Safety Plans



4.0 PROGRAM REVIEW

4.1 MPO Structure and Agreements

4.1.1 Regulatory Basis

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).

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.

4.1.2 Current Status

SWRMPO

The South Western Region MPO (SWRMPO) board consists of eight municipalities (Darien, Greenwich, New Canaan, Norwalk, Stamford, Weston, Westport, and Wilton) in addition to transit (Norwalk Transit District) and a state DOT representative. Although a CTDOT representative is participating in MPO meetings as a non-voting member, it is not clear if the state DOT representative is functioning as the MPO desires. The MPO meets monthly, acting on items specific to the portion of the Bridgeport-Stamford TMA within its metropolitan planning area.

The region also has a Technical Advisory Group (TAG) which provides support to the SWRMPO. The TAG consists of town planners, town engineers, public works officials, transit district representatives and COG staff. There are no bylaws or documents defining specific membership to or responsibilities of the TAG.

Roles and responsibilities of the SWRMPO, CTDOT, and the public transportation operators are defined in the Prospectus, a written document within the MPO's approved Unified Planning Work Program (UPWP) for FY 2022 and FY 2023 which outlines the Federally required elements of transportation planning between the parties.

GBVMPO



The Greater Bridgeport and Valley MPO (GBVMPO) board consists of ten municipalities (Ansonia, Bridgeport, Derby, Easton, Fairfield, Monroe, Seymour, Shelton, Stratford, and Trumbull) in addition to transit (Greater Bridgeport Transit Authority, Valley Transit District) and a state DOT representative. Although a CTDOT representative is participating in MPO meetings as a non-voting member, it is not clear if the state DOT representative is functioning as the MPO desires. The MPO meets every two months, or as needed, and acts on items specific to the portion of the Bridgeport-Stamford TMA within its metropolitan planning area. MetroCOG and NVCOG staff effectively collaborate in managing the actions needed by the MPO, and the executive directors of both COGs serve as co-secretaires of the MPO. The bylaws for the conduct of business for the GBVMPO were last amended in October 2021.

The current GBVMPO TIP also identified the Connecticut Department of Energy and Environmental Protection (CTDEEP) as a non-voting, ex officio member. However, this is not noted in the current by-laws, and staff commented during the virtual review that CTDEEP has not participated in the MPO Board.

MetroCOG has a Transportation Technical Advisory Committees (TTAC) that makes recommendations to the GBVMPO. NVCOG participates in the MetroCOG TTAC meetings, representing the four Valley towns. NVCOG also has a TTAC. The TTACs consists of town planners, town engineers, public works officials, transit district representatives and COG staff. There are no bylaws or documents defining specific membership to or responsibilities of the TTACs.

Roles and responsibilities of the GBVMPO, CTDOT, and the public transportation operators are defined in the Prospectus, a written document within the MPO's approved Unified Planning Work Program (UPWP) for FY 2022 and FY 2023 which outlines the Federally required elements of transportation planning between the parties.

4.1.3 Findings

SWRMPO

Recommendation: WestCOG, SWRMPO, and CTDOT should work together to ensure the state transportation official to the MPO board is well-defined, engaged, and participating in the MPO in a beneficial manner.

Recommendation: The MPO should consider amending their bylaws or developing other documentation to better clarify roles, responsibilities and composition of the TAG. If the TAG is intended to be primarily an informal forum for municipal staffs to discuss items of common interest that should be documented, and if the TAG is intended to be advisory to the MPO that should be acknowledged.



Recommendation: WestCOG should consider assessing TAG membership to determine if participation by additional organizations could benefit the metropolitan planning process. This committee offers a forum for cooperative planning and information sharing to inform decision making. WestCOG is encouraged to consider additional participants that can assist in creating a safe, multi-modal, equitable, sustainable transportation system. Published documents and website materials should be updated to appropriately reflect membership.

GBVMPO

Recommendation: MetroCOG, NVCOG, and GBVMPO should work together with CTDOT to ensure the state transportation official to the MPO board is well-defined, engaged, and participating in the MPO in a beneficial manner.

Recommendation: The MPO should consider amending their bylaws or developing other documentation to better clarify roles, responsibilities and composition of the TTACs. If the TTACs are intended to be primarily informal forums for municipal staffs to discuss items of common interest that should be documented, and if the TTACs are intended to be advisory to the MPO that should be acknowledged.

Recommendation: MetroCOG and NVCOG should consider assessing TTAC membership to determine if participation by additional organizations could benefit the metropolitan planning process. These committees offer a forum for cooperative planning and information sharing to inform decision making. MetroCOG and NVCOG are encouraged to consider additional participants that can assist in creating a safe, multi-modal, equitable, sustainable transportation system. Published documents and website materials should be updated to appropriately reflect membership.

4.2 Financial Planning

4.2.1 Regulatory Basis

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.

The financial requirements related to the MTP include the following, at a minimum:



- Revenue estimates are cooperatively developed by the State, the MPO, and public transportation operators.
- 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.

The financial requirements related to the TIP include the following, at a minimum:

- 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 taken into account 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.



4.2.2 Current Status

SWRMPO

The SWRMPO MTP, locally referenced as the Long Range Transportation Plan (LRTP), covers the years 2019-2045 and provides a Financial Plan that details the MPO's strategies for investment in the region. The Financial Plan's strategies include a detailed discussion on its approach to economic vitality, travel, tourism, safety, security, accessibility, mobility, the environment, and quality of life among other overarching goals.

The MTP's *'Financial Plan Details and Fiscal Constraint'* section outlines estimated funding over the 25-year span of the plan for highway and transit projects. This section also includes a list of projects broken into 3 groupings of years (1-4, 5-10, 11-27). The MTP narrative identifies 3 categories of highway projects (system improvements, system preservation, and major projects of statewide significance), however the supporting table of projects does not categorize projects in this manner and does not provide much information on a project's scope.

The MTP's Financial Plan does not detail how the MPO determined the level of anticipated funding for the region distributed from the State, and it does not clearly indicate if the revenues and account for inflation and if costs are expressed in year-of-expenditure (YOE) dollars. Additionally, the MTP's Financial Plan does not indicate whether or not transit providers in the region have sufficient resources to operate and maintain all services and facilities under their control.

The TIP includes a Financial Plan that identifies funding contributions by federal, state and local contributions for SWRMPO broken out by year. Also included in the Financial Plan are summary tables of federal funding programs. The plan does not include narrative on the tables, it is not clear if the dollars shown are for SWRMPO programmed projects, and fiscal constraint is not clearly demonstrated.

GBVMPO

The GBVMPO MTP, locally referenced as the Long Range Transportation Plan (LRTP), covers the years 2019-2045 and provides a well-developed Financial Plan that details the MPO's strategies, level of investment, and funding sources for the region's transportation network. The Financial Plan provides a detailed discussion on the region's approach to system preservation and system improvements.

The MTP's Financial Plan provides a detailed discussion on how the MPO determined the level of anticipated funding for the region. The MPO clearly described the apportionment formula used to extract the amount of funding the region expects to receive from the state.



The 'Metropolitan Transportation Plan Financials and Funding Sources' section outlines estimated funding over the 25-year span of the plan for highway and transit projects. The narrative identifies 2 categories of highway projects (system improvements and system preservation) in addition to estimated funding for major projects of statewide significance in the Greater Bridgeport and Valley Area. Lists of preservation projects, system improvement, and major projects are included in the document.

The Financial Plan does not clearly indicate whether the costs are expressed in year-of-expenditure (YOE) dollars. Additionally, the MTP's Financial Plan does not indicate whether or not transit providers in the region have sufficient resources to operate and maintain all services and facilities under their control.

4.2.3 Findings

SWRMPO

Recommendation: The federal team understands the collaboration between CTDOT and the MPOs as it relates to financial projections for the MTP. However, the MTP must clearly demonstrate that sufficient revenues are anticipated to be available to meet the anticipated costs of the proposed projects. The MTP should demonstrate fiscal constraint by describing in detail the apportionment formula used to determine the amount of funding the MPO anticipates for the region. Additionally, the MPO should convert revenues into YOE and indicate in the list of projects the YOE.

Recommendation: 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.

Recommendation: The MPO should take a more active role in the development of the financial plan and better document its coordination with CTDOT and local transit providers. The Financial Plan should indicate if transit providers in the region have sufficient funding to meet operate and maintain all services and facilities under their control.

Recommendation: Within the MTP Financial Plan, the MPO should consider including more details in the project description as well as grouping the projects by Preservation, Improvement or Major Project categories.



GBVMPO

Recommendation: The MPO should convert costs into YOE and indicate in the list of projects the YOE.

Recommendation: The MPO should take a more active role in the development of the financial plan and better document its coordination with CTDOT and local transit providers. The Financial Plan should indicate if transit providers in the region have sufficient funding to meet operate and maintain all services and facilities under their control.

4.3 Metropolitan Transportation Plan

4.3.1 Regulatory Basis

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.

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.

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 reflect current and forecasted transportation, population, land use, employment, congestion, and economic conditions and trends.

Under 23 CFR 450.324(f), the MTP is required, at a minimum, to consider the following:

- Projected transportation demand
- Existing and proposed transportation facilities
- Operational and management strategies
- Congestion management process
- Capital investment and strategies to preserve transportation infrastructure and provide for multimodal capacity
- Design concept and design scope descriptions of proposed transportation facilities



- Potential environmental mitigation activities
- Pedestrian walkway and bicycle transportation facilities
- Transportation and transit enhancements
- A financial plan

4.3.2 Current Status

SWRMPO

The SWRMPO MTP, known locally as the Long-Range Transportation Plan (LRTP), covers the years 2019-2045 and was adopted in April 2019. The MTP includes a comprehensive multi-modal summary of regional assets, short- and long-range strategies, and actions that facilitate the efficient movement of people and goods.

Population projections were provided by the CT State Data Center and employment projections were not estimated. SWRMPO does not maintain a regional travel demand model and projected traffic demand is not a component of the MTP. The UPWP Planning Roles and Responsibilities appendix document references that trip tables are available from CTDOT upon request.

The MTP includes an abbreviated Title VI/Equity analysis with the determination that improvements proposed in the MTP have the potential to create significant benefits for all populations by improving the transportation system however no detailed methodology was included. Included in the appendix to the MTP are maps illustrating populations below the poverty level (as derived by the MPO in coordination with Title VI Environmental Justice Criteria) and environmental justice areas (as defined at the Census Tract level). Limited English Proficiency languages were also mapped and included in the MTP.

GBVMPO

The GBVMPO MTP, known locally as the Long-Range Transportation Plan (LRTP), covers the years 2019-2045 and was adopted in March 2019. The MTP includes a comprehensive multi-modal summary of regional assets, short- and long-range strategies, and actions that facilitate the efficient movement of people and goods. The MTP also includes the 2019 Congestion Management Process (CMP) for the GBVMPO.

Population projections were provided by the University of Connecticut and jobs and transportation mode to employment is generally summarized. MetroCOG does not maintain a regional travel demand model however they have been using information from StreetLight Data for origin-destination data. NVCOG is working with CTDOT, using travel demand model information supplemented with StreetLight Data. NVCOG expressed their interest in developing



a travel demand model in the future and are open to the concept of expanding it to the MetroCOG boundary. Projected traffic demand is not a component of the MTP. The UPWP Planning Roles and Responsibilities appendix document references that trip tables are available from CTDOT upon request.

4.3.3 Findings

SWRMPO

Corrective Action: The MTP is required to consider the current and projected transportation demand of persons and goods in the metro planning area over the period of the transportation plan (23 CFR 450.324(f)). In addition, the Bipartisan Infrastructure Law (BIL) enhances the requirements for ensuring consistent data is used when more than one MPO serves the same urbanized areas, including population and employment data and forecasts. For the next update of the MTP, SWRMPO must collaborate with the CTDOT, the statewide Travel Demand Model, and within the TMA to ensure the plan has a solid baseline of assumptions and forecasts for population, employment and traffic demand. The updated MTP, including appropriate data and forecasts, must be completed by May 1, 2023.

Recommendation: The MPO should consider expanding on their methodology and process for equitable distribution of prioritized projects throughout the region in the 2023 update of the MTP. This will ensure stakeholders are aware of how projects are selected as well as ensure projects are equitably distributed.

Additional recommendations related to the MTP are included in Financial Planning, Environmental Mitigation and Resiliency, and Performance Management sections.

GBVMPO

Corrective Action: The MTP is required to consider the current and projected transportation demand of persons and goods in the metro planning area over the period of the transportation plan (23 CFR 450.324(f)). In addition, BIL enhances the requirements for ensuring consistent data is used when more than one MPO serves the same urbanized areas, including population and employment data and forecasts. For the next update of the MTP, GBVMPO must collaborate with the CTDOT, the statewide Travel Demand Model, and within the TMA to ensure the plan has a solid baseline of assumptions and forecasts for population, employment and traffic demand. The updated MTP, including appropriate data and forecasts, must be completed by May 1, 2023.

Recommendation: The MPO should consider including a process for equitable distribution of prioritized projects throughout the region in the 2023 update of the MTP. This will ensure



stakeholders are aware of how projects are selected as well as ensure projects are equitably distributed.

Additional recommendations related to the MTP are included in Financial Planning and Performance Management sections.

4.4 Transportation Improvement Program

4.4.1 Regulatory Basis

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:

- 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.
- 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

4.4.2 Current Status

SWRMPO

The current SWRMPO TIP is the FFY 2021-2024 TIP, adopted in October 2020. Amendments to the TIP, after endorsement by the SWRMPO, are updated on SWRMPO's on-line TIP 'Project Listing' spreadsheet, however it is not clear when this is done as revision dates are not referenced. The MPO's TIP and Public Participation Plan do not include criteria or procedures for amending the TIP. The overall TIP amendment process is summarized in the CTDOT's *Handbook for Councils of Governments and Metropolitan Planning Organizations* appendix



document titled 'TIP STIP Administrative Action / Amendment / Notification Process', revised in October 2010.

A brief summary of comments received on the TIP was included in the TIP Public Involvement summary. Detailed public comments on the TIP were shared with TAG and SWRMPO members and the full list of comments is on record in WestCOG files. Although the *2016 Title VI Civil Rights and Public Participation Plan* references a report on the disposition of each TIP comment received will be made part of the final TIP, such a report is not included in the final TIP documentation.

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

WestCOG has project selection criteria for the Congestion Mitigation and Air Quality (CMAQ) that aligns with CTDOT guidance. The Transportation Alternatives (TA) Program also has rating criteria WestCOG applies and project selection under the last solicitation was coordinated within the TMA, with MetroCOG and NVCOG. There is no standard, documented project selection criteria, rather it is discussed and made available during a particular solicitation.

CTDOT continues to advance the eSTIP effort and is working to complete internal testing prior to rolling it out to the regions in the Summer of 2022.

GBVMPO

The current GBVMPO TIP is the FFY 2021-2024 TIP, adopted in October 2020. Resolutions related to TIP amendments are prepared and, after endorsement by the MPO, forwarded to CTDOT and FHWA/FTA. MetroCOG staff maintains an Access database of the TIP and incorporates amendments and actions to the TIP, after endorsement by the GBVMPO. Changes to the on-line TIP, reflecting TIP amendments and actions, are occasionally updated. During the desk review it was noted that the on-line TIP includes amendments up to July 29, 2021.

The MPO's TIP and Public Participation Plan do not include criteria or procedures for amending the TIP. Overall TIP revision provisions followed by the MPO are summarized in the CTDOT's *Handbook for Councils of Governments and Metropolitan Planning Organizations* appendix document titled 'TIP STIP Administrative Action / Amendment / Notification Process', revised in October 2010.

An on-line ArcGIS Story Map was prepared during the update of the TIP, assisting the public in understanding the MPO structure, project selection process, and the TIP document. GBVMPO also prepared a Spanish version of TIP Executive Summary and included it on-line. A public



outreach document summarizing the TIP legal notices, the public meeting presentation, and public comments was included in the TIP documentation.

MetroCOG typically publishes online the annual list of projects for which Federal funds have been obligated in the preceding year, however the desktop review noted the FFY2021 listing is not yet uploaded. NVCOG has the latest obligated project list for FFY 2021 on-line.

GBVMPO staff has been proactive in facilitating conversations with CTDOT leadership as it relates to the programming and prioritization of projects, resulting in a 'Lean process' initiative that will occur in June of 2022. MetroCOG and NVCOG collaborate with their towns on project selection criteria for the Congestion Mitigation and Air Quality (CMAQ), aligning criteria with CTDOT guidance. For the Transportation Alternatives (TA) Program, MetroCOG worked with SWRMPO to select projects within the TMA. There is no standard, documented project selection criteria, rather it is discussed and made available during a particular solicitation.

CTDOT continues to advance the eSTIP effort and is working to complete internal testing prior to rolling it out to the regions in the Summer of 2022.

4.4.3 Findings

SWRMPO

The TIP does not clearly demonstrate fiscal constraint and specific recommendations are included in the financial planning section of this report.

Recommendation: CTDOT and the MPO should work cooperatively to assess if the TIP and STIP revision procedures from 2010 included in CTDOT's *Handbook* are still appropriate or if updates are needed. Additionally, it is recommended that CTDOT and the MPO consider how eSTIP processes should be reflected in the revision procedures. CTDOT and the MPOs should also ensure that the revision process is transparent and available as public information.

Recommendation: The MPO should ensure the current TIP, including any adopted amendments, can be easily found online and that the TIP document is annotated with a revision date every time it is updated.

Recommendation: A disposition of public comments received on the TIP should be included as part of the final TIP document, to comply with the MPO's Public Participation Plan.



GBVMPO

Corrective Action: The MPO must upload the FFY2021 Obligated Project Listing to the MetroCOG website to comply with 23 CFR 450.334. The FY2021 listing must be posted by September 1, 2022. All future listings must be posted within 90 days of the end of the fiscal year. *(This item was addressed and completed prior to issuance of the final document.)*

Recommendation: CTDOT and the MPO should work cooperatively to assess if the TIP and STIP revision procedures from 2010 included in CTDOT's *Handbook* are still appropriate or if updates are needed. Additionally, it is recommended that CTDOT and the MPO consider how eSTIP processes should be reflected in the revision procedures. CTDOT and the MPOs should also ensure that the revision process is transparent and available as public information.

Recommendation: The MPO should ensure that amendments to the TIP are posted to the website shortly after MPO endorsement and that a TIP amendment date is included when the TIP is amended.

Commendation: GBVMPO is commended for their leadership in collaborating with CTDOT to address programming and project prioritization, leading to the Lean Process that DOT hosted in June 2022.

4.5 Transit Planning

4.5.1 Regulatory Basis

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 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.

4.5.2 Current Status

SWRMPO

The SWRMPO region is served by a wide range of passenger transportation services including rail, bus, and multiple private shuttle providers. In recent years, newer service models like microtransit have also been piloted within the region.

Data sharing between the MPO and transit providers appears to occur on an ad hoc basis driven by specific activities. For example, MPO staff coordinated with NTD and CTtransit Stamford



Division to discuss their PTASP targets prior to setting a regional target for the MPO. There may be opportunities to collaborate and share information more regularly, such as ridership data and ridership surveys.

The MPO's planning documents reflect minimal consideration of intercity bus operators, and staff indicated they do not have any contacts in order to conduct outreach.

GBVMPO

The GBVMPO region is served by a wide range of passenger transportation services including rail, bus, and multiple private shuttle providers. GBT and VTD both have seats on the MPO policy board.

The UPWP reflects regular coordination between MPO staff and transit efforts in the region. One example is the ongoing work to develop a bus shelter request evaluation method which is being done in coordination with GBT.

The MPO's planning documents reflect minimal consideration of intercity bus operators and does not indicate ongoing coordination in the transportation planning process.

4.5.3 Findings

SWRMPO

Recommendation: The MPO and public transportation providers should develop a strategy for coordination to ensure all parties are regularly sharing data and other information that may be of use to the other parties.

Recommendation: The MPO should seek ways to consider the role that intercity buses may play in reducing congestion, pollution, and energy consumption in a cost-effective manner and strategies and investments that preserve and enhance intercity bus systems, including systems that are privately owned and operated.

Recommendation: It is recommended that the MPO work closely with the region's transit providers to evaluate ridership and trends as the COVID-19 pandemic subsides. The MPO and their transit partners should consider surveys to better understand how the pandemic has impacted ridership and to ensure the existing level of service is appropriate to meet the demands of the public.



GBVMPO

Recommendation: The MPO and public transportation providers should develop a strategy for coordination to ensure all parties are regularly sharing data and other information that may be of use to the other parties.

Recommendation: The MPO should seek ways to consider the role that intercity buses may play in reducing congestion, pollution, and energy consumption in a cost-effective manner and strategies and investments that preserve and enhance intercity bus systems, including systems that are privately owned and operated.

Recommendation: It is recommended that the MPO work closely with the region's transit providers to evaluate ridership and trends as the COVID-19 pandemic subsides. The MPO and their transit partners should consider surveys to better understand how the pandemic has impacted ridership and to ensure the existing level of service is appropriate to meet the demands of the public.

4.6 Public Participation

4.6.1 Regulatory Basis

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.

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, such as low-income and minority households, who may face challenges accessing employment and other services; providing an additional opportunity for public comment, if the final MTP or TIP differs significantly from the version that was made available for public comment by the MPO and raises new material issues that interested parties could not reasonably have foreseen from the public involvement efforts; 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.



4.6.2 Current Status

SWRMPO

The Title VI Civil Rights and Public Participation Plan was endorsed by SWRMPO in December 2016. WestCOG is in the process of updating the Public Participation Plan (PPP) and making it a separate document from Title VI and Civil Rights. The updated PPP is anticipated to be complete in the fall of 2022, and they anticipate exploring new outreach strategies (e.g., virtual participation) in the update. WestCOG reviews the PPP on an annual basis, assessing the effectiveness of the public involvement process. The annual assessment outlines metrics related to the number of participants at meetings, the number of followers on social media, and newsletter metrics by month, to name a few items.

WestCOG employs a variety of approaches for the public to communicate and provide input on the planning process including newsletters and social media (e.g., Facebook, Twitter, YouTube, and LinkedIn). During the pandemic, SWRMPO transitioned to a virtual meeting platform and information continued to be made available on the WestCOG website. Corridor study public involvement consists of both traditional and non-traditional platforms including workshops and pop-up events in parks.

For the development of the MTP, WestCOG held multiple public listening sessions in towns throughout the region at different times throughout the day. The structure of these sessions provided guiding questions which lead to public dialogue.

GBVMPO

The Public Participation Plan (PPP) for GBVMPO was endorsed in October 2018 and an update is underway. The effectiveness of the PPP is monitored (e.g., the number of published legal notices, number of participants at meetings), however no structured annual summary is prepared.

MetroCOG employs a variety of approaches for engaging the public in the transportation planning process including StoryMap platforms, social media (e.g., Facebook, Twitter and LinkedIn), and website usage. During the pandemic, GBVMPO transitioned to a virtual meeting platform and information continued to be made available on the MetroCOG website.



4.6.3 Findings

SWRMPO

Commendation: SWRMPO is commended for their outreach efforts and approach to engaging public input. The multiple listening sessions for the MTP, held at different times throughout the day in varying communities, was comprehensive. The MPO also does a good job using social media, virtual tools and other platforms (e.g., newsletters) to engage the public and other regional stakeholders.

GBVMPO

Recommendation: An annual review and evaluation of the public involvement process, as stipulated in the Statement of Cooperative MPO/State/Transit Operators Planning Roles & Responsibilities of the UPWP, should be developed and included as a task in the next update of the UPWP.

Commendation: GBVMPO is commended for their outreach efforts and approach to engaging public input, particularly with their development of a StoryMap for the TIP. The MPO also does a good job using other platforms to engage the public and other stakeholders.

4.7 Civil Rights (Title VI, EJ, LEP, ADA)

4.7.1 Regulatory Basis

Title VI of the Civil Rights Act of 1964, prohibits discrimination based upon race, color, and national origin. Specifically, 42 U.S.C. 2000(d) states that “No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.” 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. ADA specifies that all programs, services, and activities undertaken by public entities regardless of the source of the funding, are prohibited from discrimination based on solely on the basis of an individual’s disability.

Executive Order #12898 (Environmental Justice) directs federal agencies to develop strategies to address disproportionately high and adverse human health or environmental effects of their programs on minority and low-income populations. In compliance with this Executive Order,



USDOT and FHWA issued orders to establish policies and procedures for addressing environmental justice in minority and low-income populations. The planning regulations, at 23 CFR 450.316(a)(1)(vii), require that the needs of those “traditionally underserved” by existing transportation systems, such as low-income and/or minority households, be sought out and considered. FTA issued Circular 4703.1 in 2012, which provides guidance to FTA recipients on how to fully engage environmental justice populations in the public transportation decision-making process, how to measure impacts and minimize or mitigate these impacts.

Executive Order # 13166 (Limited-English-Proficiency) requires agencies to ensure that limited English proficiency persons are able to meaningfully access the services provided consistent with and without unduly burdening the fundamental mission of each federal agency.

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, or, missing where they should have been constructed) and other activities and services that prevent access for persons with disabilities.

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.

Executive Order (EO) 14008, “Tackling the Climate Crisis at Home and Abroad” created a government-wide “Justice40 Initiative” that aims to deliver 40 percent of the overall benefits of relevant federal investments to disadvantaged communities. The US Department of Transportation (USDOT) will develop a methodology to identify disadvantaged communities and benefits for Justice40-covered programs, that will be consistent with guidance from the Office of Management and Budget (OMB) and relevant statutory authorities.

The Justice40 Initiative is also aligned with the goals of EO 13985, “Advancing Racial Equity and Support for Underserved Communities Through the Federal Government,” and will be implemented as part of the USDOT’s broader equity agenda.



4.7.2 Current Status

SWRMPO

Title VI – SWRMPO’s Title VI, Civil Rights, and Public Participation Plan was prepared in December 2016 and, as a subset to the plan, a Language Assistance Plan was prepared in 2019. SWRMPO is in the process of updating the Title VI, Civil Rights Plan, separating it from the PPP, and anticipates it will be complete in the Fall of 2022. The federal review team acknowledges that the Title VI complaint form was updated in 2019 and is consistent with federal policies.

Environmental Justice - The Review Team understands that there are projects programmed in the MPO TIP and MTP that were selected by CTDOT, and not by the MPO. However, for projects selected by the MPO, an EJ analysis to examine the burdens and benefits of the transportation projects was not conducted in either the TIP or MTP.

Executive Orders 14008 and 13985 – The MPO expressed their general familiarity with these two Executive Orders.

ADA - The MPOs stated that all their meetings are held in ADA accessible facilities that include accessible bathrooms, sidewalks and curb ramps. The MPO has also invited CTDOT’s ADA coordinator to present at Technical Advisory Group meetings.

GBVMPO

Title VI – As a result of a corrective action issued under the previous Bridgeport-Stamford Certification Review, GBVMPO prepared a Title VI Program and Limited English Proficiency Plan which was endorsed in October 2018. The Plan is posted on the MetroCOG website, and a Spanish version is available. Additionally, the ‘Your Rights Under Title VI’ and ‘Complaint Form’ have been translated into Portuguese, Haitian Creole, and Spanish.

Environmental Justice - The Review Team understands that there are projects programmed in the MPO TIP and MTP that were selected by CTDOT, and not by the MPO. However, for projects selected by the MPO, an EJ analysis to examine the burdens and benefits of the transportation projects was not conducted in either the TIP or MTP.

Executive Orders 14008 and 13985 – The MPO expressed their general familiarity with these two Executive Orders.

ADA – The MPO stated that all of their meetings are held in ADA accessible facilities that include accessible bathrooms, sidewalks and curb ramps. The MPO has also invited CTDOT’s ADA coordinator to present at their Transportation Technical Advisory Committee meetings.



4.7.3 Findings

SWRPMO

EJ Recommendation: To be consistent with the Executive Order on EJ, the MPO will need to conduct a benefit 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 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. Staff is recommended to take the virtual NHI Fundamentals of EJ class (course number FHWA-NHI-142074) to understand the basics of EJ and to document the analysis in the TIP and MTP.

Executive Orders 14008 and 13985 Recommendation: The MPO staff should increase its awareness of the two Executive Orders, [EO 14008](#) and [EO 13985](#) and prepare for the rollout by attending webinars and other virtual meetings as they become available.

ADA Recommendation: The MPO should continue their coordination with CTDOT in educating municipalities on their responsibilities under ADA and Section 504 and send a summary of the Municipal ADA Assessments to FHWA/FTA annually.

ADA Recommendation: The MPO should assess how they communicate with disabled persons. Alternative communication methods such as TTY (Teletypewriter) and TDD (Telecommunication Device for the Deaf) and relay services that will allow the hearing-impaired individual to communicate through the telephone to receive information from the MPO should be considered. In addition, the MPO will need to provide alternative formats for written documentation and ensure accessibility for electronic communication for individuals with disabilities. As discussed at the certification review, CTDOT is willing to provide technical assistance on the alternative formats to communicate with people with disabilities.

Recommendation: 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.

GBVMPO

EJ Recommendation: To be consistent with the Executive Order on EJ, the MPO will need to conduct a benefit 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 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. Staff is recommended to take the virtual NHI Fundamentals of EJ class (course number FHWA-NHI-142074) to understand the basics of EJ and to document the analysis in the TIP and MTP.

Executive Orders 14008 and 13985 Recommendation: The MPO staff should increase its awareness of the two Executive Orders, [EO 14008](#) and [EO 13985](#) and prepare for the rollout by attending webinars and other virtual meetings as they become available.

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Recommendation: 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.

4.8 Transportation Safety and Security

4.8.1 Regulatory Basis

Federal planning regulations require MPOs to consider safety and security as two of ten planning factors. As stated in 23 CFR 450.306(b)(2) and (3), the planning process needs to consider and implement projects, strategies, and services that will increase the safety and security of the transportation system for motorized and non-motorized users.

In addition, SAFETEA-LU established a core safety program called the Highway Safety Improvement Program (HSIP) (23 U.S.C. 148), which introduced a mandate for states to have Strategic Highway Safety Plans (SHSPs). 23 CFR 450.306(d) requires the metropolitan transportation planning process should be consistent with the SHSP and other transit safety and security planning.



4.8.2 Current Status

SWRMPO

SWRMPO, in close coordination with the CTDOT and their member municipalities, completed and endorsed a Regional Transportation Safety Plan (RTSP) in June 2021. WestCOG staff indicated the RTSP development provided an excellent opportunity to work closely with a diverse group, including elected officials and first responders from the municipalities, to identify and document safety issues and potential locations for targeted safety improvements. The RTSP is one resource used to identify and rank potential projects under regional project solicitations. The RTSP is referenced when selecting corridor studies and planning projects. WestCOG anticipates folding the RTSP into the next update of the MTP.

SWRMPO participates in CTDOT's Community Connectivity Program. Through this program, WestCOG has conducted Road Safety Audits (RSA) in some of their communities and collaborated with the Technology Transfer (T2) Center on providing technical assistance in development of short, mid, and long-term recommendations.

WestCOG participates in the Strategic Highway Safety Plan (SHSP) Steering Committee and has been engaged in the development of the updated SHSP.

WestCOG is a member of the T2 Center's Safety Circuit Rider Advisory Committee and uses the Connecticut Crash Data Repository extensively to understand safety issues and to support their review and adoption of safety performance targets developed by CTDOT.

SWRMPO has been actively supporting the deployment of Speed Feedback Signs through the CTDOT led program. SWRMPO noted that the speed feedback sign program has been well received by their municipalities, who have actively deployed the signs during the pandemic to help address the higher speeds observed on their roadways.

Related to security, WestCOG worked with the Connecticut Division of Emergency Management and Homeland Security (DEMHS) early in the pandemic to assist with a transit asset inventory, and they continue to collaborate with DEMHS on evacuation routes. WestCOG will be advancing a cyber security audit in the next year.

GBVMPO

GBVMPO, in close coordination with the CTDOT and their member municipalities, has completed and endorsed RTSPs for MetroCOG (endorsed 2020) and for NVCOG (endorsed 2021). The RTSP is used to identify safety projects for implementation, as well as to ensure that any project (e.g., LOTCIP funded projects) within the region incorporates appropriate



recommended safety improvements identified in the RTSP. MetroCOG and NVCOG anticipate preparing annual reports that complement the RTSP.

GBVMPO participates in CTDOT's Community Connectivity Program. Since 2020, they have conducted Road Safety Audits (RSA) in the Towns of Monroe and Easton, as well as the City of Bridgeport. The MPO collaborates directly with the T2 Center Safety Circuit Rider program to obtain additional technical assistance in development of short, mid, and long-term safety recommendations.

The GBVMPO noted that safety is integrated into the planning process. They use the Connecticut Crash Data Repository extensively to understand the safety issues and drive their selection and prioritization of corridor studies.

GBVMPO started a Regional Traffic Counts Program in 2020, which included the purchase and use of Miovision cameras to obtain traffic counts and supportive analysis for various studies and preliminary project identification.

Related to security, MetroCOG and NVCOG worked with DEMHS early in the pandemic to assist with a transit asset inventory, and they continue to collaborate with DEMHS and CTDOT on evacuation routes. As it relates to cyber security, MetroCOG consults with an IT manager who, in addition to providing data storage, provides ongoing threat monitoring.

4.8.3 Findings

SWRMPO

Recommendation: SWRMPO is encouraged to develop a documented approach on how safety is considered as part of their project selection process. The specific uses of the RTSP in this process could be further defined to ensure limited resources are focused on addressing safety on all projects. This documented approach should also consider the specific goals (e.g., reduction of fatalities, serious injuries, or all crashes) of the funding programs to ensure projects selected will support achievement of the safety performance targets.

Recommendation: SWRMPO should plan for regular updates to the RTSP, and the associated strategy implementation contained therein. This may include coordinating with the CTDOT Safety Office to ensure the RTSP supports the safety targets and goals for the region.

Commendation: WestCOG is commended for their active participation and engagement with the SHSP Steering Committee and the T2 Center's Safety Circuit Rider Advisory Committee.



GBVMPO

Recommendation: GBVMPO is encouraged to develop a documented approach on how safety is considered as part of their project selection process. The specific uses of the RTSP in this process could be further defined to ensure limited resources are focused on addressing safety on all projects. This documented approach should also consider the specific goals (e.g., reduction of fatalities, serious injuries, or all crashes) of the funding programs to ensure projects selected will support achievement of the safety performance targets.

Recommendation: GBVMPO should consider coordinating with CTDOT and the T2 Center on the potential uses of the CT Roadway Safety Management System (CRSMS) application. The CRSMS application can support safety project identification efforts, as well as benefit-cost analysis, project prioritization, and safety effectiveness evaluations. The use of the CRSMS modules can support the decision making on which safety projects will be most effective in achieving their safety-related objectives, as well as potential safety benefits from other projects that are not solely focused on safety.

Commendation: MetroCOG is commended for the initiation of a Miovision program within the region. This proactive approach to supporting more in-depth analysis of traffic and safety conditions is commended.

4.9 Freight Planning

4.9.1 Regulatory Basis

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).

In 2012, changes were introduced to the planning process by requiring States, MPOs, and public transportation operators to link investment priorities to the achievement of performance targets. Freight movements are one of the key areas in which the MPO's performance targets address identified performance measures. Metropolitan transportation planning requirements in 23 U.S.C. 134 indicate that it is in the national interest to encourage and promote the safe and efficient management, operation, and development of surface transportation systems that will serve the mobility needs of people and freight and foster economic growth and development within and between States and urbanized areas.

Additional requirements of MPOs to integrate freight planning into the MPOs' transportation planning process include:



- 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 in order 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.

4.9.2 Current Status

SWRMPO

The MPO has been cooperating with the CTDOT in developing the State Freight Plan and is helping them update it by providing supplemental regional information such as major freight generators. The MPO has worked as a partner in the Metropolitan Area Planning (MAP) Forum in a multi-state freight working group, truck parking and clean freight corridors have been recent focus areas. The MPO maintains a freight generator list. WestCOG has been considering developing a regional freight profile after the Statewide Freight Plan is completed.

The MTP briefly address freight bottlenecks and generally highlights freight generators and truck parking issues.

The MPO participates in Talking Freight Seminars hosted by FHWA.

GBVMPO

The MPO has been cooperating with the CTDOT in developing the State Freight Plan and is helping them update it by providing supplemental regional information such as major freight generators. The MPO has worked as a partner in the MAP Forum in a multi-state freight working group, truck parking and clean freight corridors have been recent focus areas. MetroCOG updated their regional transportation viewer with data on bridge clearance and condition. The Naugatuck Valley COG (NVCOG) has used StreetLight Data analytics to identify truck movements into, through and from the Naugatuck Valley Region as well as determine key truck origins and destinations in the region.



The MTP discusses freight within the region, highlighting the Port of Bridgeport's strategic location to the interstate system and the Port of New York and New Jersey.

The MPO participates in Talking Freight Seminars hosted by FHWA.

4.9.3 Findings

SWRMPO

Freight planning has been approached on a multi-state level, through the MAP Forum, and not specifically addressed in a separate regional freight report or profile.

Recommendation: SWRMPO should start to put more emphasis on freight planning at a regional level, working to advance a freight profile illustrating commodity flows and major truck origins and destinations, at a minimum.

Recommendation: Understanding that freight is and will be a growing source of congestion in southwest CT and federal regulations expand consultation requirements to include freight shippers as interested parties during MTP and TIP preparation, SWRMPO should provide opportunities for freight providers and stakeholders to participate in the transportation planning process. It is further recommended that outreach to freight stakeholders be include in the next update of the PPP.

GBVMPO

The MPO has approached freight planning on a multi-state level, through the MAP Forum, and not specifically been addressed in a regional freight report or profile.

Recommendation: GBVMPO should start to put more emphasis on freight planning at a regional level, working to advance a freight profile illustrating commodity flows and major truck origins and destinations, at a minimum. It is recommended that MetroCOG coordinate with NVCOG to understand available StreetLight Data analytics within the MPO.

4.10 Performance Management

4.10.1 Regulatory Basis

The following citations pertain to requirements for MPOs under performance management:

23 CFR 450.306(d) states that each MPO shall establish performance targets to support the national goals and track progress towards the attainment of critical outcomes. Each MPO shall



coordinate with the relevant State to ensure consistency, to the maximum extent practicable, and establish performance targets not later than 180 days after the State or provider of public transportation establishes its performance targets. The selection of performance targets that address performance measures described in 49 U.S.C. 5326(c) and 49 U.S.C. 5329(d) shall be coordinated to the maximum extent practicable, with public transportation providers to ensure consistency with the performance targets that public transportation providers establish under 49 U.S.C. 5326(c) and 49 U.S.C. 5329(d). Additionally, each MPO shall integrate the goals, objectives, performance measures, and targets from other performance-based plans and programs integrated into the metropolitan transportation planning process.

23 CFR 450.324(f)(3) and (4) outline requirements for the MTP. The MPO MTP shall include:

- a description of the (Federally required) performance measures and performance targets used in assessing the performance of the transportation system.
- a system performance report evaluating the condition and performance of the transportation system with respect to the (Federally required) performance targets including progress achieved by the MPO the performance targets.

23 CFR 450.218(q) and 23 CFR 450.326(d) require that, to the maximum extent practicable, a description of the anticipated effect of the TIP toward achieving the performance targets identified by the MPO in the MTP. TIPs shall link investment priorities to achievement of performance targets in the plan.

23 CFR 450.314(h) requires that the MPO(s), State(s), and the providers of public transportation shall 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 (see § 450.306(d)) and the collection of data for the State asset management plan for the NHS.

23 CFR 450.340 states that MPOs have two years from the effective dates of the planning and performance measures rule to comply with the requirements.

4.10.2 Current Status

Both MPOs' approach to Performance Based Planning and Programming as an ongoing effort that is centered around adopting the State's targets. Neither MPO has adopted a set of performance



targets unique to the region, however, there has been some discussion of developing local non-regulatory performance measures.

SWRMPO

On April 9, 2021, CTDOT, Milford Transit District, Valley Transit District, Greater Bridgeport Transit Authority, Norwalk Transit District, Housatonic Area Regional Transit District, WestCOG, MetroCOG, and NVCOG fully executed an *Agreement Regarding Transportation Planning & Funding in the Bridgeport/Stamford TMA*. The agreement details that the MPOs, transit operators and CTDOT mutually agree to meet to discuss setting performance targets. Additionally, the 2022-2023 Unified Planning Work Program, adopted May 20, 2021, includes an Appendix- "Statement of Cooperative MPO/State/Transit Operators' Planning Roles & Responsibilities." The UPWP identifies the roles of the MPO in carrying out the performance-based planning and programming process.

SWRMPO includes targets in the FFY2021-2024 TIP and the 2019 MTP. The SWRMPO MTP includes a Performance-Based Planning and Programming chapter that describes the performance measures and targets for assessing performance of the transportation system. The MPO has not produced a stand-alone system performance report; however, performance items are included in various MTP chapters. The MTP Performance-Based Planning and Programming chapter provides the performance measures and adopted CTDOT targets but does not include how those measures are influencing the planning and programming processes conducted by the MPO. Additional information would improve the system performance report to document how the MPO is working to achieve its targets.

GBVMPO

On April 9, 2021, CTDOT, Milford Transit District, Valley Transit District, Greater Bridgeport Transit Authority, Norwalk Transit District, Housatonic Area Regional Transit District, WestCOG, MetroCOG, and NVCOG fully executed an *Agreement Regarding Transportation Planning & Funding in the Bridgeport/Stamford TMA*. The agreement details that the MPOs, transit operators and CTDOT mutually agree to meet to discuss setting performance targets. Additionally, the 2022-2023 Unified Planning Work Program, adopted May 27, 2021, includes a "Statement of Cooperative MPO/State/Transit Operators' Planning Roles & Responsibilities, Amended March 10, 2021." The UPWP identifies the roles of the MPO in carrying out the performance-based planning and programming process.

GBVMPO includes targets in the FFY2021-2024 TIP and the 2019-2045 MTP. The GBVMPO MTP includes a Transportation Performance Management chapter that describes the performance measures and targets for assessing performance of the transportation system. The MPO has not produced a stand-alone system performance report; however, performance items are included in



various MTP chapters. The MTP Transportation Performance Management chapter provides the performance measures and adopted CTDOT targets but does not include how those measures are influencing the planning and programming processes conducted by the MPO. Additional information would improve the system performance report to document how the MPO is working to achieve its targets.

4.10.3 Findings

SWRMPO

To better track regional system performance over time, SWRMPO may want to consider using an independent stand-alone document that can be updated on a yearly basis. Information describing the existing conditions of assets and the progress made toward achieving the performance target in comparison to previous reports should be included and, SWRMPO can decide whether this information should be provided in a quantitative or qualitative format.

The TIP includes a discussion of each performance measure with no substantial description of the anticipated effects or how the projects identified in the TIP are working toward achievement of the adopted performance targets.

Recommendation: The TIP should include a description of how the anticipated effects of 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 help to meet the targets.

GBVMPO

To better track regional system performance over time, GBVMPO may want to consider using an independent stand-alone document that can be updated on a yearly basis. Information describing the existing conditions of assets and the progress made toward achieving the performance target in comparison to previous reports should be included and, GBVMPO can decide whether this information should be provided in a quantitative or qualitative format.

The TIP includes a discussion of each performance measure with no substantial description of the anticipated effects or how the projects identified in the TIP are working toward achievement of the adopted performance targets.

Recommendation: The TIP should include a description of how the anticipated effects of 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 help to meet the targets.

4.11 Congestion Management Process / Management and Operations

4.11.1 Regulatory Basis

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.

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.
- Major ITS projects should move forward based on a project-level architecture that clearly reflects consistency with the national ITS architecture.
- All projects shall be developed using a systems engineering process.



4.11.2 Current Status

SWRMPO

SWRMPO's Congestion Management Process (CMP) report is dated 2014 and used data from the National Performance Management Research Data Set (NPMRDS). The content of the CMP is limited and does not include many of the required CMP elements such as methods to monitor and evaluate performance, discussions on the causes and strategies for non-recurring congestion, CMP objectives, strategies, and performance measures to assess congestion. In addition, the CMP only addresses the network within the WestCOG regional boundaries and does not cover the full TMA as required.

WestCOG prepared Corridor Briefings in 2016 for Interstate 95 and the Merritt Parkway within the WestCOG boundaries. The briefings provide abbreviated corridor facts related to travel speeds by direction and in relation to interchanges.

WestCOG currently has a Request for Qualifications (RFQ) out for a study which will include conceptual congestion reduction projects across the WestCOG region, and work is anticipated to begin this year. The study is anticipated to evaluate and rank congested locations/corridors within the 18 WestCOG towns, screen projects, and develop preliminary design concepts for towns to advance. WestCOG expressed this study would result in the development of their CMP and noted that their CMP update cycle is not currently aligned with the GBVMPO CMP update cycle.

SWRMPO noted that much of their congestion and traffic originates and extends beyond their MPO boundaries. They are interested in coordinating with the Metropolitan Area Planning (MAP) Forum to possibly evaluate and approach congestion issues from a wider lens.

SWRMPO noted success with recent CMAQ and LOTCIP funded traffic signal projects in Norwalk, Stamford, and Greenwich. These projects have led to a reduction of travel times and, with the Stamford project, a significant reduction in fatalities.

Diversion routes are being coordinated between the CT Division of Emergency Management and Homeland Security (DEMHS) and CTDOT, however the schedule for updating the routes was unknown during the virtual review. SWRMPO includes upgrading incident management programs as a strategy in the MTP.

Coordination between WestCOG and CTDOT related to Intelligent Transportation Systems (ITS) has been limited. WestCOG expressed that it may be a benefit to facilitate a conference on traffic management (e.g., signals in Stamford managed by both the state and City of Stamford).



A South Western Region Intelligent Transportation Systems (ITS) Strategic Plan was prepared in 2009 and the Connecticut Statewide ITS Architecture was updated in 2018. In November 2015 CTDOT prepared a Statewide Computerized Traffic Signal Systems (CTSS) Needs Assessment outlining future regional CTSS projects. Some municipalities within SWRMPO have been working to secure Congestion Management and Air Quality (CMAQ) funding to optimize traffic signals and advance ITS technologies.

GBVMPO

GBVMPO's current Congestion Management Process (CMP) report is included in their MTP dated 2019. The CMP provides methods to monitor and evaluate performance of the multimodal system. Objectives, strategies, and performance measures are addressed within the CMP as required. The CMP addresses both recurring and non-recurring congestion and also includes non-limited access roadways such as US Route 1, Route 34, and Route 110. The CMP only addresses the network within the GBVMPO region and does not cover the full TMA as required. GBVMPO plans to update their CMP in 2023, in combination with the update of their MTP.

GBVMPO coordinates diversion routes with both the Capitol Region Council of Governments (CRCOG), who maintains some static maps on their website, and with DEMHS / CTDOT.

During the virtual review it was noted that CTDOT collaboration on ITS could be improved within the GBVMPO, as examples: Variable Message Signs (VMS) locations could be better coordinated, and data collected by the CTDOT Bridgeport Operations Center could assist GBVMPO with regional planning.

In November 2015 CTDOT prepared a Statewide Computerized Traffic Signal Systems (CTSS) Needs Assessment outlining future regional CTSS projects and the Connecticut Statewide ITS Architecture was prepared in 2018. Coordination and data sharing between GBVMPO and the CTDOT Bridgeport Operations Center is limited.

4.11.3 Findings

SWRMPO

Corrective Action: SWRMPO must prepare a CMP that meets 23 U.S.C. 134(k)(3) and 23 CFR 450.322. It is strongly recommended that SWRMPO follow the eight elements of a CMP as outlined in the *Congestion Management Process: A Guidebook* (April 2011) developed by FHWA. The CMP must be completed by May 1, 2023, and coordinated with the 2023 update of the MTP. In addition, detailed tasks related to the CMP development, and related performance management activities, must be amended in the current UPWP (FY2022 and FY2023). SWRMPO



may want to assess if the scope of work associated with the conceptual congestion reduction projects warrants revision, to better align with federal regulations.

Corrective Action: SWRMPO must coordinate their CMP efforts within the TMA, cooperatively developing and implementing it with GBVMPO by May 1, 2023. Specifics as to how the coordination, development of methodologies, and how implementation will be accomplished should be included in the CMP.

Recommendation: Consider implementation of a Traffic Incident Management committee or working group (as noted in the MTP) to focus on the causes, impacts, and quick clearance of incidents within the TMA.

Recommendation: SWRMPO should work collaboratively with CTDOT to update the Diversion Route plans. This may include identification of ITS / traffic signal technologies and digitizing the plans to support quicker and more efficient deployment of diversion responses when needed.

Recommendation: SWRMPO should update their website to ensure the 2018 Connecticut Statewide ITS Architecture is available. SWRMPO and CTDOT should also evaluate opportunities to collaborate on ITS initiatives and share information and data within the TMA.

Available FHWA/FTA Resources:

- Congestion Management Process: A Guidebook
https://www.fhwa.dot.gov/planning/congestion_management_process/cmp_guidebook/cmpguidebk.pdf

GBVMPO

Corrective Action: GBVMPO must coordinate their CMP efforts within the TMA, cooperatively developing and implementing it with SWRMPO by May 1, 2023. Specifics as to how the coordination, development of methodologies, and how implementation will be accomplished should be included in the CMP.

Recommendation: GBVMPO should work collaboratively with CTDOT to update the Diversion Route plans. This may include identification of ITS / traffic signal technologies and digitizing the plans to support quicker and more efficient deployment of diversion responses when needed.

Recommendation: GBVMPO should update their website to ensure the 2018 Connecticut Statewide ITS Architecture is available. GBVMPO and CTDOT should also evaluate opportunities to collaborate on ITS initiatives and share information and data within the TMA.



4.12 Environmental Mitigation and Resiliency

4.12.1 Regulatory Basis

Environmental mitigation and resiliency are outlined in 23 USC 450 (specifically, subparts 224, 306, 316, 318, and 320). Metropolitan Transportation Plans (MTPs) are required to protect and enhance the environment, promote energy conservation, improve the quality of life, and promote consistency between transportation improvements and State and local planned growth and economic development patterns, as well as emphasize the preservation of the existing transportation system. As part of the metropolitan planning process, MPOs are also required to consider how to improve the resiliency and reliability of the transportation system and reduce or mitigate stormwater impacts of surface transportation.

4.12.2 Current Status

SWRMPO

COG staff are involved in the *Resilient Connecticut* initiatives being coordinated by the Connecticut Institute for Resilience & Climate Adaptation (CIRCA), based at the University of Connecticut. The planning initiatives are based on a grant awarded to the State through the US Department of Housing and Urban Development's National Disaster Resilience Competition. The planning is focused on coastal resilience and climate adaptation in Fairfield and New Haven Counties. The work has included development of a social vulnerability index as well as indices for vulnerability for flood, sea level rise, and heat. Location specific projects are also being evaluated for feasibility and implementation strategies and cost estimates and alignment with Federal and State climate resilience programs continue to be assessed.

Within the region, the MPO has identified vulnerabilities and threats to the transportation infrastructure. The COG updated their Multi-Jurisdiction Hazard Mitigation Plan (HMP) in 2021 on behalf of the municipalities and these plans largely inform the MPO's consideration of resilience and environmental mitigation. Much of the risk is to low-lying infrastructure including underpasses as well as risk associated with undersized culverts. The HMP modelled sea level rise but also identifies riverine flooding as a significant threat and notes a need for further evaluation. Coordinating outside of the region, WestCOG participates in the MAP Forum's Resilience Working Group.

The MTP contains a brief discussion of the environment and air quality along with more detail about climate change which is largely informed by the HMP. The MTP suggests a variety of work that can support the goals for protecting and enhancing the environment such as TOD



promotion, alternative fuels, fuel efficiency, increased transit, transportation demand management, and bicycle and pedestrian facilities.

The MTP briefly outlines environmental mitigation is an integral part of the transportation planning process, however it does not go into any detail other than referencing the COG will work with federal and state agencies. The HMP outlines mitigation strategies.

The risks identified in the HMP, and associated mitigation measures are not formally tied into the project prioritization process. The MPO is including related considerations into the planning process on an ad hoc basis, such as including green infrastructure in the scope for an upcoming corridor study. Staff also encourage municipalities to consider existing plans, including the HMP, when developing and submitting project applications.

GBVMPO

COG staff are involved in the *Resilient Connecticut* initiatives being coordinated by the Connecticut Institute for Resilience & Climate Adaptation (CIRCA), based at the University of Connecticut. The planning initiatives are based on a grant awarded to the State through the US Department of Housing and Urban Development's National Disaster Resilience Competition. The planning is focused on coastal resilience and climate adaptation in Fairfield and New Haven Counties. The work has included development of a social vulnerability index as well as indices for vulnerability for flood, sea level rise, and heat. Location specific projects are also being evaluated for feasibility and implementation strategies and cost estimates and alignment with Federal and State climate resilience programs continue to be assessed. MetroCOG's Executive Director also serves on the Governor's Council of Climate Change (GC3).

Within the region, the MPO has identified vulnerabilities and threats to the transportation infrastructure. The MetroCOG and NVCOG developed regional hazard mitigation plans (HMP) on behalf of their municipalities and these plans largely inform the MPO's consideration of resilience and environmental mitigation. Much of the risk is to low-lying infrastructure including underpasses as well as risk associated with undersized culverts. Coordinating outside of the region, MetroCOG and NVCOG participate in the MAP Forum's Resilience Working Group with the MetroCOG Planning Director serving as co-chair.

The MTP includes a discussion of various environmental issues. It discusses the threats presented by climate change and some of the most significant risks for infrastructure in the region. It also includes a discussion of a variety of other relevant studies such as the HMP and the post-Hurricane Sandy Transportation Resilience study completed by FHWA. This section of the MTP also identifies a few recommended projects that can improve resiliency.



The risks identified in the HMP, and associated mitigation measures are not formally tied into the project prioritization process. The MPO aims to include green infrastructure elements into project development and design. Additionally, staff encourage municipalities to consider existing plans, including the HMP, when developing and submitting project applications.

4.12.3 Findings

SWRMPO

Recommendation: Federal regulations require the MTP to include a discussion of the types of potential environmental mitigation activities and the potential areas to carry out these activities. The next update of the MTP should expand upon environmental mitigation activities that minimize the environmental impacts of transportation improvements (e.g., low-impact development, green infrastructure). The discussion may focus on policies, programs or strategies, rather than focus on the project level.

Recommendation: The MPO should look for ways to institutionalize consideration of resiliency needs and environmental mitigation opportunities throughout the planning process such as in planning studies, MTP development (including consultation with appropriate agencies), and project evaluation processes. This will better position the MPO to plan for a sustainable infrastructure system that works for all users, advance the transition to electric and other alternative fueled vehicles, and undertake actions to prepare for and adapt to the impacts of climate change.

GBVMPO

Recommendation: The MPO should look for ways to institutionalize consideration of resiliency needs and environmental mitigation opportunities throughout the planning process such as in planning studies, MTP development (including consultation with appropriate agencies), and project evaluation processes. This will better position the MPO to plan for a sustainable infrastructure system that works for all users, advance the transition to electric and other alternative fueled vehicles, and undertake actions to prepare for and adapt to the impacts of climate change.

4.13 TMA Coordination

4.13.1 Regulatory Basis

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.

More specifically, 23 CFR 450.314(e) states:

“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.”

4.13.2 Current Status

Within the TMA, SWRMPO and GBVMPO have worked together in a limited capacity. A couple of examples include collaboration on the Transportation Alternatives program and their involvement in the Metropolitan Area Planning (MAP) forum which brings together MPOs from throughout the greater New York City area to work on shared issues. There are many items of common interest (e.g., Interstate 95, data sets) that could benefit from collaboration and regular discussions within the TMA. The COGs have established good working relationships with transit partners and some CTDOT officials.

An Agreement Regarding Transportation Planning and Funding in the Bridgeport/Stamford TMA between WestCOG, MetroCOG, NVCOG, HART, NTD, GBTA, VTD, Milford Transit District (MTD), and CTDOT was executed in April 2021.

As MPO staffs, WestCOG and MetroCOG/NVCOG do not coordinate or meet to discuss projects or programs of mutual interest on a regular basis.



MetroCOG and NVCOG are regularly coordinating and sharing information related to transportation planning and initiatives for the GBVMPO. This collaboration was evident prior to and during the virtual certification review.

4.13.3 Findings

The TMA agreement was executed in 2021; however, there is no structure in place for coordinating planning activities or meeting on a regular basis to review each other's planning programs or discuss projects or programs of mutual interest. This coordination is critical for the success of the TMA, and meeting, at least annually, is a component of the agreement.

Corrective Action: The MPOs must ensure collaboration meetings within the TMA occur on a regular basis, annually at a minimum. WestCOG and MetroCOG/NVCOG staff may consider alternating who facilitates the meeting and invite FHWA/FTA officials. The agenda should include a review of each other's planning programs and an identification of projects or programs of mutual interest. The first coordination meeting must be held by October 31, 2022.



APPENDIX A – PARTICIPANTS AND MEETINGS

The following individuals from the federal agencies were involved in the Bridgeport-Stamford urbanized area virtual review meetings:

FHWA	FTA
Jennifer Carrier	Leah Sirmin
Erik Shortell	Margaret Griffin
Michael Chong	Chcolby McFarland
Kurt Salmoiraghi	
Tim Snyder	
Michael D’Alessandro (partial)	

Agendas and attendees of the virtual and public meetings can be found below.

MONDAY **April 4th**

<i>Session 1</i> SWRMPO	8:30 AM	0:10	8:40 AM	Intro and Virtual Meeting Logistics
	8:40 AM	0:20	9:00 AM	Opportunity to Present
	9:00 AM	1:00	10:00 AM	Programming and TIP
	10:00 AM	0:15	10:15 AM	Break
	10:15 AM	1:00	11:15 AM	Civil Rights
	11:15 AM	0:45	12:00 PM	Public Involvement
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<i>Session 2</i> GBVMPO	1:00 PM	0:10	1:10 PM	Intro and Virtual Meeting Logistics
	1:10 PM	0:20	1:30 PM	Opportunity to Present
	1:30 PM	1:00	2:30 PM	Programming and TIP
	2:30 PM	0:15	2:45 PM	Break
	2:45 PM	1:00	3:45 PM	Civil Rights
	3:45 PM	0:45	4:30 PM	Public Involvement

TUESDAY **April 5th**

<i>Session 3</i> SWRMPO	1:00 PM	0:30	1:30 PM	Organizational Structure and Governance
	1:30 PM	0:30	2:00 PM	MTP and Financial Planning
	2:00 PM	0:30	2:30 PM	PBPP
	2:30 PM	0:15	2:45 PM	Break
	2:45 PM	1:00	3:45 PM	Transit Planning (including collaboration with Transit Agencies)
	3:45 PM	0:30	4:15 PM	Safety and Security



WEDNESDAY **April 6th**

<i>Session 4</i> <i>GBVMPO</i>	8:30 AM	0:30	9:00 AM	Organizational Structure and Governance
	9:00 AM	0:30	9:30 AM	MTP and Financial Planning
	9:30 AM	0:30	10:00 AM	PBPP
	10:00 AM	0:15	10:15 AM	Break
	10:15 AM	1:00	11:15 AM	Transit Planning (including collaboration with Transit Agencies)
	11:15 AM	0:30	11:45 AM	Safety and Security

THURSDAY **April 7th**

<i>Section 5</i> <i>SWRMPO &</i> <i>GBVMPO</i>	8:30 AM	1:00	9:30 AM	TMA Coordination (including Freight)
	9:30 AM	1:00	10:30 AM	TMA - Resiliency and Environmental Mitigation
	10:30 AM	0:15	10:45 AM	Break
	10:45 AM	1:00	11:45 AM	TMA - CMP & Operations and Management
	11:45 AM	0:15	12:00 PM	Closing and next steps

Attendees:

WestCOG: Francis Pickering, Kristin Hadjstylianos

MetroCOG: Matt Fulda, Patrick Carleton, Meghan Sloan, Devin Clarke, Colleen Kelleher, Hannah Reichle, Mark Hoover

NVCOG: Rick Dunne, Mark Nielsen, Josh Lecar, Desira Blanchard, Richard Donovan, Kate Minutillo, Kevin Ellis

CTDOT: Maribeth Wojenski, Rose Etuka, Sara Radacsi, Jennifer Pacacha, Debra Goss, Adam Cohen

Greater Bridgeport Transit Authority: Doug Holcomb, Steven DeMichele (participated in the April 6th session from 10:15AM – 11:15AM)



APPENDIX B – PUBLIC COMMENTS, MPO AND TECHNICAL COMMITTEE INPUT

Stakeholder and public comments were solicited at meetings held on March 31 and April 12, 2022, through input from MPO members and technical advisory committee members, and through comments received via email to the Federal Review Team.

The following summarizes the comments received, categorized by general theme:

TMA Operations:

Two MPOs serve the Bridgeport-Stamford TMA and they are significantly different in their organizational structure, focus and priorities. It was outlined that GBVMPO serves and coordinates the needs of two separate COGs (MetroCOG and Valley COG). WestCOG manages the HVMPO, in addition to SWRMPO, and HVMPO lies outside of the Bridgeport-Stamford TMA and has varying population density, congestion and air quality concerns. The comment expressed concerns that, from a transportation perspective it does not make sense to have one COG coordinating the needs of two MPOs.

Transit Districts:

There are too many transit districts in a relatively small area, presenting confusion with the TMA due to the fact that the MPO boards consist of chief elected officials (of member towns) and transit districts which results in multiple, varied operators competing for the same state and federal dollars for capital and operating funds to run individual systems.

Correspondence received highlighting the benefits of the partnership between the Norwalk Transit District and SWRMPO.

Correspondence received highlighting the benefits of the partnership between the HartTransit and SWRMPO.



APPENDIX C – PREVIOUS FINDINGS AND DISPOSITION

The previous certification review for the Bridgeport-Stamford urbanized area was conducted in 2018, with the certification issued on July 12, 2018. The 2018 Certification Review recommendations and the current appraisal are summarized below. Please note that appraisals below are reported by MPO staff; they do not serve as an assessment by the Federal Review Team.

Review Area	2018 Corrective Actions / Recommendations	11/5/2020 Mid-Cycle Check-In Meeting Notes	February 2022 MPO Appraisal
Unified Planning Work Program (UPWP)	Recommendation: The SWRMPO should utilize the Prospectus when developing the UPWP tasks to assure coverage of required items.	Prospectus is helpful to region in developing UPWP; Core documents are shared within TMA and they collaborate on grant programs (eg TA set aside, sharing solicitation and evaluation criteria); TMA also collaborates on data collection (eg inventory of transit assets); There are standing meetings with peer COGs and MPOs; Monthly DOT COG meetings and COGs EDs; Transportation Directors are also coordinating	WestCOG has implemented this recommendation and used the Prospectus to develop the FY22-23 UPWP which was adopted on 5/20/2021.
Metropolitan Transportation Plan	Recommendation: The financial plan should include the revenue discussion within the table of projects to portray where and how shortfalls may occur within the short, medium and long-range timeframes. The MTP must include the coordinated TMA-wide CMP and incorporation of MPO and TMA performance targets, per FAST Act requirements under 23 CFR 450.324(f)(3 and 4), 23 CFR 450.324 and 23 CFR 450.322.	Region asked for ways to document financial shortfalls; 'Unfunded list' was one suggestion; General discussion about funding uncertainty; CTDOT has an unfunded list of projects too	WestCOG is starting work on the upcoming MTP. In our review of the Infrastructure Investment and Jobs Act, we noticed that the Code of Federal Regulations will be updated to reflect that the outer years of the MTP will be defined as "beyond the first 4 years". WestCOG would appreciate any guidance FHWA can provide on how to best consider this change in the financial plan of the next MTP. The 2019 MTP included CMP data and incorporated a new chapter on performance measures and the targets supported by the MPO. In the development of the upcoming MTP, WestCOG will coordinate with MetroCOG and NVCOG on our CMP analysis and the concept designs for projects to mitigation congestion. Performance measures will be updated to reflect new targets and the MTP will include discussion on any progress made.



Review Area	2018 Corrective Actions / Recommendations	11/5/2020 Mid-Cycle Check-In Meeting Notes	February 2022 MPO Appraisal
Transit Planning	<p>Recommendation: Given the strong presence of transit in the region, we recommend that the MPO consider broadening their coordination to include all transit providers (i.e. Metro North, CT transit, etc.). .</p>	<p>The region is more involved on a project basis with the transit agencies; The upcoming BUILD grant will require coordination with Metro North; The region will also be looking an environmental improvements (noise reduction) and will be coordinating with Metro North on that too; CT transit is engaged.</p>	<p>WestCOG has implemented this recommendation through continued coordination with transit providers in the region. The BUILD grant study and the Noise Reduction Feasibility study will require close coordination with Metro-North. WestCOG has coordinated with the CTDOT Office of Rail for the Noise Reduction Feasibility Study. WestCOG would like Metro-North to be an active participant on both study's Advisory Committees. WestCOG will work with the CTDOT Office of Rail to coordinate contact with Metro-North.</p> <p>Staff have continued to assist CTDOT with transit planning efforts, including evaluating and providing comments on the recent LOCHSTP document and circulating the LOCHSTP survey to relevant stakeholders in the region. WestCOG consults with transit providers as part of the TIP development, during annual FTA Section 5310 and CTDOT MGP13b funding cycles, and in the development of TAMPs and PTASPs.</p> <p>WestCOG coordinated meetings with CTDOT and Norwalk Transit District (NTD) to evaluate the PTASP safety performance targets. WestCOG used safety data provided by both CTDOT (for CTtransit Stamford Division) and NTD to develop safety targets for SWRMPO which were endorsed in March 2021.</p> <p>During the COVID-19 pandemic, staff contacted the region's transit authorities, non-profit organizations and municipalities to develop an inventory of transit services, vehicles and operating personnel. This information was assembled to support the CT Department of Emergency Management and Homeland Security (DEMHS)'s pandemic response activities.</p>



Review Area	2018 Corrective Actions / Recommendations	11/5/2020 Mid-Cycle Check-In Meeting Notes	February 2022 MPO Appraisal
Transportation Improvement Program	<p>Recommendation: The financial plan can be improved by providing more information on revenue sources. The document should include a summary demonstrating financial constraint by year by funding source.</p> <p>Recommendation: In accordance with 23 CFR 450.316(a)(2), the TIP should include a summary, analysis and report of the disposition of comments received on the draft TIP. Documentation of the response provided to public comments received should be included, either directly or by reference (e.g., referring to publicly posted summaries provided for the policy board, etc.).</p> <p>Recommendations: Project Selection Procedures – For public transparency purposes, project selection criteria for all funding programs should appear on the MPO website and in the MTP.</p>	<p>This is a popular planning document within their region and they provided more financial information in the latest version; The financial information is more detailed and shows funding by year and by program; Public Involvement was included in the latest document; Region received over 100 comments on the TIP and they summarized the general discourse of the comments in the document; Project selection procedures are shared publicly with MPO and TAG members</p>	<p>WestCOG has implemented these recommendations. The TIP report included financial tables by program and funding for each year as well as a summary of the comments received from the public.</p> <p>Project selection procedures are updated and shared publicly during each program solicitation. This information is shared through memorandums in our TAG and MPO meeting packets, posted on our website, and shared with the TAG, MPO members, and other eligible applicants via email and the WestCOG newsletter.</p>
Public Participation	<p>Recommendation: An annual evaluation of the public involvement process, as stipulated in the Prospectus of the UPWP, should be developed as a task in the 2019 UPWP, and the results of that evaluation should be submitted to FHWA and FTA.</p>	<p>This year's Public Participation summary is on hold because of COVID; The overall PI process has changed so the region needs more time; They monitor this closely; Virtual engagement has been successful and they have gotten better public attendance; TIP meetings were all virtual; LEP and safe harbor languages are considered</p>	<p>WestCOG has implemented this recommendation and included the FY21 annual evaluation in the package of materials submitted for this review.</p> <p>WestCOG is currently working on an update of the Public Involvement Plan which will include additional strategies on virtual public engagement. The draft plan is expected to be released for public comment this spring.</p>



Review Area	2018 Corrective Actions / Recommendations	11/5/2020 Mid-Cycle Check-In Meeting Notes	February 2022 MPO Appraisal
Civil Rights (Title VI, EJ, LEP, ADA)	<p>Recommendation: The MPO should develop a new complaint form that will accurately capture the nondiscrimination statutes and protections. In addition, all complaints filed in which the MPO is named as the respondent should be forwarded to CTDOT Office of Contract Compliance for investigation. Copies of these complaints should be sent to FHWA and FTA. The complaint form should be titled Title VI/Civil Rights complaint form. The new complaint form should be limited to race, age, color, disability, national origin and sex. Title VI protected groups should have race, color and national origin listed next to Title VI to assist complainants in identifying the category of the complaint.</p> <p>Recommendation: The MPO is recommended to work with CTDOT to educate municipalities on their responsibilities under ADA and Section 504 to ensure that all programs, activities, and services under their jurisdiction are examined to identify barriers to access for persons with disabilities. With CTDOT's assistance, an ADA Transition Plan or Program Access Plan should be developed describes the steps to make their program areas accessible to persons with disabilities.</p>	<p>There was a Title VI review last year and this was all addressed (Michael Chong participated in the review).</p> <p>ADA – Region has been providing info to Boards and invited Executive Director of Center of Disability Rights ; Provided information to PB members; coordinated w/CTDOT on municipal survey; invited DOT's ADA coordinator to present to TAG</p>	<p>These recommendations have been implemented. WestCOG updated the complaint form during our Title VI review with CTDOT and FHWA.</p> <p>The MPO will coordinate with CTDOT if a municipality has questions regarding ADA requirements or accessibility. WestCOG will continue to evaluate accessibility in our transportation projects. For example, during the Westport Main to Train Study the consultants inventoried the existing infrastructure and identified specific locations that required ADA Access Improvements. Additional accessibility improvements, which included pedestrian ramps, upgraded pedestrian signals, crosswalks, pavement markings, and new sidewalks, were incorporated into the study's concept plans.</p> <p>Though the Hazard Mitigation Plan (HMP) is not a planning document under the MPO's UPWP, understanding the barriers a municipality faces during a storm response is critical in keeping the transportation system functioning and accessible. In recent years, extreme weather events, like Tropical Storm Isaias, resulted in an impassible transportation network. Widespread power outages and blocked roads were caused by downed trees and wires. As a result, WestCOG heard from Chief Elected Officials that some residents with disabilities were stranded in their homes and unable to receive help. This feedback helped inform the recommendations that were developed for the municipalities, including tree maintenance and elevating roads, bridges, and other infrastructure above the base flood elevation. +</p>



Review Area	2018 Corrective Action / Recommendations	11/5/2020 Mid-Cycle Check-In Meeting Notes	February 2022 MPO Appraisal
TMA Coordination	<p>Recommendation: Each MPO in the Bridgeport-Stamford TMA should document how TMA coordination occurs for each required core document, not simply state that an agreement exists.</p>	<p>The TMA MOU is on-going; the PB endorsed the agreement in April and MetroCOG and NVCOG endorsed; The challenge has been getting signatures through the pandemic; Kurt suggested option where the signature page could be eg 10a with one signature, 10b with a different signature, 10c,...</p>	<p>WestCOG has implemented this recommendation through the updated TMA agreement which was signed by all parties of the MOU and fully executed on 4/9/2021.</p> <p>WestCOG, MetroCOG, and NVCOG coordinate on transportation planning in a variety of ways. Core documents are shared, we participate in the CTDOT-COG coordination meetings, MAP Forum, Multi-State Freight Working Group, Multi-State Resiliency Working Group, COG Executive Director meetings, and periodic meetings with the MPO Transportation Directors. An example of the close TMA-wide coordination was the 2019 TAP Solicitation. Each COG reviewed the TAP application submissions for the Bridgeport-Stamford UZA and met together to develop the list of project priorities for MPO endorsement.</p>
Freight Planning	<p>Recommendation: As the MPO compiles the freight data in association with performance targets for freight, a review of the 2010 South Western Region Freight Overview may be helpful to identify freight barriers that might still exist in the network.</p>	<p>They have an interest in doing a regional freight plan but they have not; TRANSsearch has data but it is only on a county basis; NYMTC is working on their freight plan and discussions between WestCOG and NYMTC occurred; Region also participated in MAP Forum; Data is challenging; lack of parking and rail infrastructure is problematic in the region; Bottlenecks on I-95 are challenging; WestCOG would like other MPOs that have good freight examples – we should follow up with HQ to get good examples to forward on; They plan on using information from the Census to assist with aggregates in their area</p>	<p>WestCOG has implemented this recommendation and reviewed regional freight information during the development of the freight performance targets. The MPO supported CTDOT's Truck Travel Time Reliability targets at the November 2018 meeting.</p> <p>The MPO is involved in the development of the upcoming Statewide Freight Plan. Staff updated the list and GIS data of major freight generators in the region and shared with CTDOT in November 2021. Staff also participated in a meeting with CTDOT and Housatonic Railroad Company in November 2021 to discuss freight-related challenges and opportunities.</p> <p>Staff are working on developing a freight profile that uses available information generated by CTDOT, the MAP Forum, and others to highlight existing freight conditions and to identify some of the issues associated with freight in the region. The profile remains in development and WestCOG anticipates making use of newer data generated in CTDOT's update of the Statewide Freight Pan.</p> <p>Through the MAP Forum, staff are active participants of the Multi-State Freight Working Group to ensure freight planning efforts are coordinated. Staff participated in a review of emergency truck parking locations in Connecticut in April 2021.</p> <p>Staff are also gathering important feedback from stakeholders on freight issues through regional sector partnerships. This will help inform freight related strategies in the upcoming MTP.</p>



Review Area	2018 Corrective Action / Recommendations	11/5/2020 Mid-Cycle Check-In Meeting Notes	February 2022 MPO Appraisal
Safety Planning	<p>Recommendation: As safety planning and safety targets are discussed in the upcoming 2019 MTP, the SWRMPO, in coordination with CTDOT, is advised to work on developing strategies to measure progress in attaining safety targets.</p>	<p>A regional safety plan is being developed – consultant has met with all municipalities; has been a successful effort – site visits for those that have concerns and safety measures are being developed; Region is involved in other safety committees – eg member of SHSP</p>	<p>WestCOG has implemented this recommendation through coordination with CTDOT in the development of annual safety targets, which were most recently endorsed by the MPO in January 2022. WestCOG will continue monitoring safety data to identify trends in the region. Safety remains a consideration when prioritizing transportation projects and plans. Staff coordinated with CTDOT and the municipalities during the development and meetings for the Regional Transportation Safety Plan. The final plan was endorsed by the MPO on 6/17/2021.</p> <p>Staff continue to participate on the SHSP Advisory Committee, CT Bicycle and Pedestrian Advisory Board, and the UConn T2 Center Safety Circuit Rider Advisory Committee.</p> <p>WestCOG's Traffic Counting Program is very successful, and staff receive requests throughout the year to conduct counts on roadways where there may be a safety concern. Recently, staff completed a traffic count in Darien near an elementary school because the town had concerns about the safety of students walking to school and the volume of traffic.</p>



Review Area	2018 Corrective Action / Recommendations	11/5/2020 Mid-Cycle Check-In Meeting Notes	February 2022 MPO Appraisal
Nonmotorized Planning / Livability		<p>The region has done a lot for non-motorized transportation; Stamford bike-ped master plan is completed; also working on a regional bicycle plan – to develop a network with connections - likely complete in December; The region offered a webinar on managing parks and open spaces during COVID; They have counters on trails; They are assisting the City of Greenwich and Darien; Also assisting Westport (Main to train connections) ; Many of their corridor studies also look at non-motorized improvements</p>	<p>WestCOG has finalized the regional bicycle network and the draft report will be released within the next month for public comment. The plan has identified gaps in the existing network and evaluated available right-of-way, shoulder width, elevation change, access to transit hubs and stops, proximity to schools and parks, and connection to urbanized areas and villages. This informed the development of the regional network which includes on-road and multi-use trail facilities.</p> <p>WestCOG continues to provide technical assistance to the municipalities through our Trail Counting Program. Recently, staff conducted trail counts in Stamford and New Canaan. WestCOG’s Traffic Counting Program also collects data on pedestrian and bicycle volumes. This information has been used to identify high traffic areas, recommendations for enhanced infrastructure, and to help support grant applications.</p> <p>WestCOG has continued to work with Congressional delegation to draw attention to the importance of the Norwalk River Valley Trail and support efforts for the full completion of the trail between Norwalk and Danbury.</p> <p>WestCOG is a member of the CT Bicycle and Pedestrian Advisory Board. WestCOG continues to share funding opportunities for non-motorized transportation projects and has provided letters of support for municipalities applying to the CT Community Connectivity Grant Program and the DEEP Recreational Trails Grant Program. WestCOG staff have regular coordination with Bruce Donald, the East Coast Greenway Alliance’s Southern New England Manager, regarding non-motorized planning opportunities in Western Connecticut.</p>
Congestion Management Process	<p>Recommendation: A TMA-wide effort in the area of CMP should utilize the data resource tools aligned with cooperatively developed objectives and strategies.</p>	<p>WestCOG worked with MetroCOG and NVCOG on dataset analysis and performance measure; Now working on local network data; Able to analyze congestion on local network – will be interesting to see how COVID impact congestion</p>	<p>WestCOG has implemented this recommendation by continuing coordination with MetroCOG and NVCOG on congestion mitigation. WestCOG evaluated congestion on the local roadway network and is looking to flesh out these findings and develop concept plans for congestion mitigation projects. WestCOG will be hiring a consultant to provide this technical assistance and will be engaging with MetroCOG and NVCOG during the study and concept development.</p>



Review Area	2018 Corrective Action / Recommendations	11/5/2020 Mid-Cycle Check-In Meeting Notes	February 2022 MPO Appraisal
Performance Management	<p>Recommendation: Greater specificity on how the projects in the TIP will work to achieve the performance targets, per 23 CFR 450.218(q), will need to be added to the current information as more precise strategies are developed, as well how those projects support the targets identified in the MTP. Performance elements, per 23 CFR 324(f)(3 and 4), are required for the MTP update to be approved in 2019.</p>	<p>PM is Included as a narrative In MTP and TIP; they haven't had enough time to evaluate some projects because the process is so new – they need a few more years as it's an evolving process</p>	<p>WestCOG has implemented this recommendation by adding additional language in the TIP and MTP on performance measures.</p> <p>Evaluating how projects impact performance targets is a complex process. WestCOG will continue to coordinate with CTDOT in the development and evaluation of performance targets. This is still a relatively new process, and the project development pipeline can take several years for a project to move from concept, into design, and finally into construction. Beyond construction, it might take several years for the benefits to be reflected in a quantifiable way.</p> <p>In addition to this timeline, we also know there are many external factors that can impact a particular performance area. For example, the MPO or CTDOT can prioritize transportation projects that have good crash modification factor ratings to improve safety. However, unexpected external factors may hinder CTDOT in achieving the annual safety targets. During Covid, while traffic volumes were decreasing the safety data reflects that there was an increase in fatalities. We need more fundamental research to understand why we may not be seeing the results we want to see (reduction in fatalities and serious injuries).</p>



GBVMPO:

Review Area	2018 Corrective Actions / Recommendations	11/5/2020 Mid-Cycle Check-In Meeting Notes	February 2022 MPO Appraisal
MPO Structure and Agreements	<p>Recommendation: The GBVMPO should consider modifying the by-laws to allow quorum determinations based on the total number of members in the Policy Board, to help achieve quorums.</p>	<p>MPO is continuously working on redesignation; There has been a stalemate between Bridgeport and a few valley towns; Bylaw piece fits in structural piece; Executive Director has relayed there are no negative implications to Bridgeport with redesignation,</p>	<p>MetroCOG and NVCOG are coordinating on the potential of revising the bylaws to address the dual quorum requirement; however, the decision will require assurances that Valley region minority interests are considered. Efforts will continue to redesignate MPO boundaries to be co-terminus with COG boundaries.</p>
Unified Planning Work Program (UPWP)	<p>Recommendation: Based on the GBVMPO's expressed goal to produce a unified MTP in 2019, the 2021-2022 UPWP, in support of the MTP, should be unified also and not segregate tasks by sub-region.</p> <p>Recommendation: The Prospectus, which is based on the MPO requirements stated in 23 CFR 450, should be utilized as a guide for the MPO when devising its UPWP.</p>		<p>#1 – Acknowledged. MetroCOG will work with NVCOG for a unified UPWP for the MPO (2024-2025), which will combine 6B w/tasks 1-5. The 2022-2023 UPWP mirrors the PL funding structure for the MPO.</p> <p>#2 – See roles and responsibilities on pages 52-60 of 2022-23 UPWP.</p>
Metropolitan Transportation Plan	<p>Corrective Action: The 2019 plan, without the segregation of the four Valley towns, must include a coordinated TMA-wide CMP and incorporation of MPO and TMA performance targets, per FAST Act requirements under 23 CFR 450.324(f)(3 and 4), 23 CFR 450.324 and 23 CFR 450.322, to be completed and approved by the GBVMPO by the end of the State fiscal year.</p>	<p>Included outreach across both regions simultaneously May 2019 endorsement;</p> <p>Included full CMP using TransCOM data</p>	<p>See pages 155-168 for CMP.</p>



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Transit Planning	<p>Recommendation: Given the strong presence of transit in the region, we recommend that the MPO consider broadening their coordination to include all transit providers (i.e. Metro North, CT transit).</p>	<p>Metro North Coordination – the region asked for suggestions on how to collaborate and coordinate with Metro North – it has historically been challenging; FHWA acknowledged the potential obstacles; Suggestions such as relationship building and participation in other efforts surfaced; FHWA also suggested they would follow up with FTA</p>	<p>The GBVMPO agrees that increased coordination with CTDOT Office of Rails (as the MTA works under contract to this office) would be beneficial to the Region. We are working to establish a contact at this agency so that regular collaboration can occur.</p> <p>We would also encourage participation in the GBVMPO Policy Board as well as for the TIP, MTP and our other planning efforts. At its October 28, 2021 meeting, the GBVMPO voted to designate the CTDOT Bureau Chief of Policy and Planning as a non-voting member of the Board. This designee will serve as the representative of CT Transit and Metro-North interests and projects.</p> <p>Any additional assistance that FTA can provide would be helpful.</p>
Transportation Improvement Program	<p>Corrective Action: The next TIP update adopted by the GBVMPO must include a financial plan to comply with 23 CFR 450.326(j) including a clear comparison of anticipated revenues and programmed expenditures demonstrating financial constraint.</p> <p>Recommendation: The MPO should ensure the current TIP, including any adopted amendments, can easily be found online.</p> <p>Recommendation: Project Selection Procedures – For public transparency purposes, project selection criteria for all funding programs should appear on the MPO website and in the MTP.</p>		<p>#1 – see Section VI, Financial Assessment on pages 16-18</p> <p>#2 – see updated website (direct link to page is https://ctmetro.org/transportation/funding/); the TIP is periodically updated as amendments are adopted</p> <p>#3 – TIP – see Section II, TIP Development Process, pages 7-8 and Section VII Funding Source Descriptions on pages 18-20</p> <p>#3 - MTP – see Section 15: Metropolitan Transportation Plan Financials & Funding Sources, pages 202-214. The funding programs on the previous website quickly became out of date. We have updated our new website to include links to FTA's and FHWA's funding program webpages (in the TIP section)</p>



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Public Participation	<p>Corrective Action: The MPO must prepare and endorse a Public Involvement Plan, in accordance with 23 CFR 450.316. This document should be in place within 90 days of the date of the transmittal of the final certification review report, and must be the only PIP for the entire GBVMPO MPA.</p> <p>Recommendation: MetroCOG and NVCOG should create a standalone website dedicated to the required Federal functions and products of the GBVMPO or identical web pages prominently accessible from both host agency website home pages.</p> <p>Recommendation: An annual evaluation of the public involvement process should be developed as a task in the 2019 UPWP, and the results of that evaluation should be submitted to FHWA and FTA.</p>		<p>#1 - See https://ctmetro.org/about-us/public-participation/ for PIP</p> <p>#2 – Added link to NVCOG main page under GBVMPO (https://ctmetro.org/about-us/governance/); Added link to NVCOG public participation page at https://ctmetro.org/about-us/public-participation/</p> <p>#3 – See Task IV: Public Participation in UPWP at https://metrocog-website.s3.us-east-2.amazonaws.com/Website+Content/UPWP/UPWP+Book+2022%2B2023.pdf, pages 32-33. Metrics to evaluate the PIP are in development.</p>



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Civil Rights (Title VI, EJ, LEP, ADA)	<p>Corrective Action: The MPO must prepare and endorse a Title VI Plan. This document should be in place within 90 days of the date of the transmittal of the certification review report.</p> <p>Recommendation: The MPO will need to address the executive orders on Environmental Justice and Limited English Proficiency. These documents should be in place within 90 days of the date of the transmittal of the certification review report.</p> <p>Recommendation: The MPO is recommended to work with CTDOT to educate municipalities on their responsibilities under ADA and Section 504 to ensure that all programs, activities, and services under their jurisdiction are examined to identify barriers to access for persons with disabilities. With CTDOT's assistance, an ADA Transition Plan or Program Access Plan should be developed describes the steps to make their program areas accessible to persons with disabilities.</p>	<p>All endorsed Oct 2018 held public meetings, received a few comments and addressed; Continually coordinated with FHWA (Ken Shooshan-Stoller) through process; Everything translated into Spanish too</p> <p>Civil rights is on website right now, but they are currently going through an overhaul; Region hired a consultant to work on website; likely to go live in the next couple of weeks; did with an eye toward public use; PPP is also on their website</p>	<p>#1 – See https://ctmetro.org/about-us/public-participation/, scroll down to Title VI plan.</p> <p>#2 – see link above and page 8 for EJ, pages 9-13 for LEP.</p> <p>#3 – this was an item at Transportation Technical Advisory Committee meetings on 12/5/2018 and 1/23/2019. Materials were distributed and Leo Fontaine w/CTDOT presented at the January meeting. The January agenda and minutes are included with this transmittal. (see documents folder)</p>
TMA Coordination	<p>Recommendation: Each MPO in the Bridgeport-Stamford TMA should document how TMA coordination occurs for each required core document, not simply state that an agreement exists.</p>		<p>Stakeholder lists for the GBVMPO include Executive Director and Planning Director/Senior Planner contacts at WestCOG (Frances and Kristin), NVCOG (Mark, Aaron, Rick Dunne, Rich Donovan) and SCRCOG (Carl, Eugene and Steve). Also includes Melissa at RPA and Gerry at NYMTC.</p> <p>These lists are used for certification review, MTP, TIP and public participation documents.</p> <p>The endorsed MOU for transportation planning and funding in the TMA has been included with requested documents.</p>



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Freight Planning	<p>Recommendation: Expand and deepen the analysis of freight issues and opportunities for the planning area into a distinct report and incorporate the findings and recommendations into the 2019 MTP.</p>	<p>NYMTC Freight Plan links with SW Connecticut; Truck parking is an issue in their region; MAP Forum has allowed quick solutions to freight identified issues (e.g. rest stop shut downs); City of Bridgeport has an active Port Authority however they may also fall under the state authority; GBVMPO has done some work with Port Authority associated with high speed ferry; The Bridgeport Port itself has not been dredged in a number of years; There are also 2 Amazon distribution warehouses in their region (one in Trumbull) which will be looked at in the next MTP update as it will impact freight mobility in their region; Mark Hoover – from GBVMPO is their data point person; They have looked at bridge clearance issues and upgraded maps for CTDOT with GIS map layers</p>	<p>See MTP pages 130-136</p> <p>Due to the size of Connecticut, a standalone report for 10 municipalities in the state would not effectively identify issues and opportunities that impact freight movement. However, the GBVMPO assists with state and tri-state planning for freight. These include:</p> <ul style="list-style-type: none"> • Participation in the MAP Forum’s Freight Working Group. Ensuring truck parking and amenities and identifying clean freight corridors have been the recent focus. • Liaison between CTDOT and member municipalities on identifying freight generators and stakeholders. • State freight plan: In September 2021, MetroCOG and NVCOG attended the State freight plan webinar and provided the state liaison with information regarding the region’s largest freight generators. GBVMPO is currently awaiting the State Freight Plan and plans to provide feedback once the review is finished. • MetroCOG updated their regional transportation viewer with the latest bridge data from CTDOT. The data provides information on bridge condition and clearance. • NVCOG has used StreetLight Data transportation analytics to identify truck movements into, through and from the NV region and has used the data to determine key truck origins and destinations in the region.



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Safety Planning	Recommendation: As safety planning and safety targets are discussed in the upcoming 2019 MTP, the MPO, in coordination with CTDOT, is advised to develop strategies to measure progress in attaining safety targets. The Pedestrian Safety Plan should be extended beyond the Valley towns.	VN Engineers prepared the Regional Safety Plan and GBVMPO worked closely with them; The full plan is out right now for final input; Most projects are more state funded than federal; hot spot analysis was conducted too A 'Vision Zero' section was added to SHSP	See https://ctmetro.org/transportation/transportation-planning/ for RTSP; this includes pedestrian safety. See https://nvcogct.gov/what-we-do/transportation-planning/highway-safety-program/ for Regional Highway Safety Plan. See MTP pages 147-149 for safety targets. – this includes an explanation of Vision Zero As CTDOT develops performance targets for safety, receiving safety performance data at the MPO or COG level help assess those strategies that have shown the most progress. Staff are attending meetings of the State's Vision Zero committee.



<p>Nonmotorized Planning/Livability</p>		<p>GBVMPO worked to develop a regional bike share plan which wasn't advanced/completed however Bridgeport used portions for their scooter share launch; This scooter program was a positive initiative in a negative year (COVID); There were approximately 33,000 total rides over the summer; The region has also coordinated with GBT and an effort was coordinated by Megan – at GBT's request</p> <p>GBVMPO is constantly working on non-vehicular projects with towns; Trumbull Pequonnock River Trail (approx. 16 miles) all mostly completely, some portions use CMAQ money – last portion will be constructed in the Spring; Rt 111 in Trumbull – unsignalized crossing – creating a new signalized intersection</p> <p>Region has done some ADA work – they have a full SW plan which is</p>	<p>Regional Bikeshare Program: while this program was never regionally implemented, the City of Bridgeport used material developed through the project to inform administration of their scooter share program. If the pilot program is approved permanently, 2023 will be its 3rd year</p> <p>Pequonnock River Trail:</p> <ul style="list-style-type: none"> • Bridgeport: CMAQ funded portion complete or close to complete. • Monroe: state funds being utilized to construct a connection between federally funded portions (Wolfe Park) • Trumbull: TA funds being utilized to strengthen connection between the trail head and a commuter parking lot (off of Route 15) <p>Stratford: several complete streets and greenway projects underway.</p> <p>Naugatuck River Greenway Trail:</p> <ul style="list-style-type: none"> • NVCOG oversees the NRG Steering Committee and maintains the NRG webpage. • Derby: The Derby-Shelton Bridge is being renovated and reconstructed (State Proj. No. 126-174). The project includes creating a cycle-track and pedestrian plaza across the bridge. Connects with Shelton Riverwalk via the existing slip ramp to Canal Street that has been closed to traffic. • Ansonia: TA funds used to construct an overpass of the Waterbury rail line and an extension of the Riverwalk into the downtown area. • Ansonia: State Rec Trails funds being used to determine the preferred alignment of the trail north of downtown to Seymour. • Seymour: NVRDC submitted an application for CT Community Challenge funds to support a TOD development. Includes construction of the trail between Rt 67 and Rt 42. <p>Trail mapping:</p> <ul style="list-style-type: none"> • MetroCOG created a regional Trail Viewer. (https://ctmetro.maps.arcgis.com/apps/webappviewer/index.html?id=ddcca4b2684b44049b12048203c2d07c) • Trails were mapped and points of interest were documented and photographed. The viewer allows users to sort by town and trail difficulty to find the appropriate hike
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		<p>provided to each town and the region stays available to assist; Region provides base info for towns as a starting point for their work / advancement; The region's new office location guarantees ADA accommodations now (it had not previously) – they are in Bridgeport</p>	<ul style="list-style-type: none"> NVCOG works with UCONN on the CT Trail Census project; involves continuous trail counters and assessment of data. Also, assisted in developing the CT Trail Finder application. <p>Livability: planning studies focus on improvements that will enhance the livability of an area, as well as comfort and safety of nonmotorized users.</p> <p>NVCOG is working on a Sustainability tool-kit that highlights opportunities and actions that municipalities can implement to become more sustainable.</p>
Congestion Management Process	<p>Recommendation: The MPO should, in concert with SWRMPO, follow the step-by-step direction on constructing a CMP (see Congestion Management Process: A Guidebook) to produce a deliberate process that can serve to inform the 2019 MTP and project development thereafter.</p>		<p>As part of the 2023 MTP, the GBVMPO will expand their CMP to use UZA boundaries for Route 15, Route 1 and I-95. This will in addition to the CMP for portions of arterials entirely within the MPO. All analysis will be provided to WestCOG/SWRMPO.</p> <p>Both agencies will be collaborating with NYMTC (through the MAP Forum), as well as CTDOT, in the development of congestion targets in the BS-UZA (White Plains)</p> <p>SWRMPO will include the GBVMPO in their CMP advisory committee. The GBVMPO will utilize their MTP outreach process to ensure that SWRMPO has an opportunity to participate in the GBVMPO's MTP CMP.</p>
Performance Management	<p>Recommendation: Greater specificity on how the projects in the TIP will work to achieve the performance targets, per 23 CFR 450.218(q), will need to be added to the current information as more precise strategies are developed, as well how those projects support the targets identified in the MTP. Performance elements, per 23 CFR 324(f)(3 and 4), are required for the MTP update to be approved in 2019.</p>	<p>Given reality of that performance targets are newer – it has been challenging to draw them into other docs</p>	<p>See TIP pages 8-15.</p> <p>See MTP 147-154; tried to include as many regional measures as possible; see safety planning section for additional data needs.</p> <p>GBVMPO Request: CTDOT/RPMs include information on how projects will support targets (as they're added to the TIP).</p>



APPENDIX D – LIST OF ACRONYMS

ADA: Americans with Disabilities Act
AMPO: Association of Metropolitan Planning Organizations
BIL: Bipartisan Infrastructure Law
CAA: Clean Air Act
CFR: Code of Federal Regulations
CMP: Congestion Management Process
CO: Carbon Monoxide
DOT: Department of Transportation
EJ: Environmental Justice
FAST: Fixing America’s Surface Transportation Act
FHWA: Federal Highway Administration
FTA: Federal Transit Administration
FY: Fiscal Year
HSIP: Highway Safety Improvement Program
ITS: Intelligent Transportation Systems
LEP: Limited-English-Proficiency
M&O: Management and Operations
MAP-21: Moving Ahead for Progress in the 21st Century
MPA: Metropolitan Planning Area
MPO: Metropolitan Planning Organization
MTP: Metropolitan Transportation Plan
NAAQS: National Ambient Air Quality Standards
NO₂: Nitrogen Dioxide
NOAA: National Oceanic and Atmospheric Administration
NPMRDS: National Performance Management Research Data Set
O₃: Ozone
PTASP: Public Transportation Agency Safety Plan
PM₁₀ and PM_{2.5}: Particulate Matter
SHSP: Strategic Highway Safety Plan
STIP: State Transportation Improvement Program
TDM: Travel Demand 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





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