

January 26, 2023

Esteemed Chairs Cohen and Lemar,  
Members of the Transportation Committee:

The Western Connecticut Council of Governments (WestCOG) appreciates the opportunity to comment on House Bill 5917, *An Act Implementing the Recommendations of the Vision Zero Council*.

WestCOG supports a goal of zero transportation deaths and serious injuries. However, **WestCOG is concerned about provisions of the bill and accordingly opposes the bill in its current form.**

Specifically, section 7 of the bill (lines 161-173) misinterprets and misapplies provisions of the Infrastructure Investment and Jobs Act (IIJA) and would duplicate existing state and regional programs in complete streets and transportation safety with 169 individual municipal safety plans:

- Under current federal law, the Connecticut Department of Transportation creates and maintains a Strategic Highway Safety Plan (SHSP). An SHSP is “a major component and requirement of the Highway Safety Improvement Program (HSIP) (23 U.S.C. § 148). It is a statewide-coordinated safety plan that provides a comprehensive framework for reducing highway fatalities and serious injuries on all public roads. An SHSP identifies a State’s key safety needs and guides investment decisions towards strategies and countermeasure with the most potential to save lives and prevent injuries.”<sup>1</sup> WestCOG actively participates in and supports this process.
- In addition, under federal law, the state’s Councils of Governments (COGs), in their roles as federally-designated Metropolitan Planning Organizations (MPOs) are responsible for regional, multimodal transportation safety planning. With the support of the Connecticut Department of Transportation, COGs have developed comprehensive Safety Action Plans. These plans, which have also been referred to as Regional Transportation Safety Plans, were created in partnership with the member municipalities of every COG. Accordingly, **there is no need to complete 169 local safety plans**, and the requirement that municipalities create standalone plans should be eliminated from the bill.
- **There is a need for is financial resources to take advantage of new federal funding.** Notably, IIJA includes a new Safe Streets and Roads for All (SS4A)<sup>2</sup> program to prevent roadway deaths and serious injuries through the. A successful grant application under this program entails two prerequisites: a) having a Safety Action Plan in place and b) providing a 20% nonfederal match. Because COGs already have regional safety plans, they are eligible to apply for funding under this program – and in many cases already have done so. However, **finding match remains a major barrier to regional and local governments**,

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<sup>1</sup> <https://highways.dot.gov/safety/hsip/shsp>  
[https://www.cti.uconn.edu/cti/CT\\_Strategic\\_Highway\\_Safety\\_Plan.asp](https://www.cti.uconn.edu/cti/CT_Strategic_Highway_Safety_Plan.asp)

<sup>2</sup> <https://www.transportation.gov/grants/SS4A>

which are the only eligible applicants under this program (states are ineligible) and which, unlike states, do not have Special Transportation Funds they can draw on for match.

- The funds at stake – and potential benefit to Connecticut – are large. Congress funded SS4A at a \$5 billion level. In September, WestCOG applied for \$40 million of these funds in (with \$10 million required in nonfederal matching funds) to build safety improvements at 100 separate locations across the region. Such a grants will be transformative for the region. However, **COGs and their members will only be able to bring this federal spending to Connecticut if matching resources are available.**
- IIJA requires that states and MPOs expend at least 2.5% of the federal planning funds they receive on complete streets, active transportation, intermodal connections, public transit, the safety of pedestrians and cyclists, and transit-oriented development, *unless* they a) adopt complete streets standards or policies and b) have developed an up-to-date Complete Streets prioritization plan that “that identifies a specific list of Complete Streets projects to improve the safety, mobility, or accessibility of a street.”<sup>3</sup> This is the only place in federal law that a Complete Streets prioritization plan is defined. In other words – the statutory purpose of a Complete Streets prioritization plan is for a state or MPO to opt out of spending – or having to document spending – on complete streets and the other areas identified above. Under federal law, a Complete Streets prioritization plan is not intended to apply to local governments. Given this, **the requirement that municipalities create a Complete Streets prioritization plan should be eliminated from the bill.**

In summary, WestCOG urges you to **remove new planning requirements from section 7 and instead provide the resources needed – namely nonfederal match – for regions and their members to maximize their access to federal funds to implement existing safety plans.**

Thank you for your consideration.



Francis R. Pickering  
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<sup>3</sup> <https://www.congress.gov/bill/117th-congress/house-bill/3684/text>