The Elements of a Complete Streets Policy

Effective 2018

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The National Complete Streets Coalition (NCSC) previously identified 10 elements of a comprehensive Complete Streets policy to help communities develop and implement policies and practices that ensure streets are safe for people of all ages and abilities, balance the needs of different modes, and support local land uses, economies, cultures, and natural environments.

The Complete Streets movement has since evolved from when it first began over a decade ago to focus far more on implementation and equity. In response to these changes, in 2017 the Coalition updated and revised the Complete Streets policy framework to require more accountability from jurisdictions and provisions that account for the needs of the most vulnerable users. The 10 revised policy elements are based on decades of collective expertise in transportation planning and design, created in consultation with NCSC's steering committee members and a group of national stakeholders consisting of engineers, planners, researchers, and advocates.

The elements serve as a national model of best practices that can be implemented in nearly all types of Complete Streets policies at all levels of governance. For communities considering a Complete Streets policy, this resource serves as a model; for communities with an existing Complete Streets policy, this resource provides guidance on areas for improvements.

An ideal Complete Streets policy includes the following:

1. **Vision and intent:** Includes an equitable vision for how and why the community wants to complete its streets. Specifies need to create complete, connected, network and specifies at least four modes, two of which must be biking or walking.

2. **Diverse users:** Benefits all users equitably, particularly vulnerable users and the most underinvested and underserved communities.

3. **Commitment in all projects and phases:** Applies to new, retrofit/reconstruction, maintenance, and ongoing projects.

4. **Clear, accountable expectations:** Makes any exceptions specific and sets a clear procedure that requires high-level approval and public notice prior to exceptions being granted.

5. **Jurisdiction:** Requires interagency coordination between government departments and partner agencies on Complete Streets.

6. **Design:** Directs the use of the latest and best design criteria and guidelines and sets a time frame for their implementation.

7. **Land use and context sensitivity:** Considers the surrounding community's current and expected land use and transportation needs.

8. **Performance measures:** Establishes performance standards that are specific, equitable, and available to the public.

9. **Project selection criteria:** Provides specific criteria to encourage funding prioritization for Complete Streets implementation.

10. **Implementation steps:** Includes specific next steps for implementation of the policy.

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1. Vision and intent

A Complete Streets vision states a community's commitment to integrate a Complete Streets approach into their transportation practices, policies, and decision-making processes. This vision should describe a community's motivation to pursue Complete Streets, such as improved economic, health, safety, access, resilience, or environmental sustainability outcomes. The vision should acknowledge the importance of how Complete Streets contribute to building a comprehensive transportation network. This means that people are able to travel to and from their destinations in a reasonable amount of time and in a safe, reliable, comfortable, convenient, affordable, and accessible manner using whatever mode of transportation they choose or rely on.

This does not mean putting a bike lane on every street or a bus on every corridor. Rather, it requires decision-makers to consider the needs of diverse modes that use the transportation system, including but not limited to walking, biking, driving, wheeling/rolling, riding public transit, car sharing/carpooling, paratransit, taxis, delivering goods and services, and providing emergency response transportation.

12 points available:

- 3 points: The policy is clear in intent, stating firmly the jurisdiction's commitment to a Complete Streets approach, using "shall" or "must" language. This needs to be in the body of the legislation, not the "whereas" statement.

    - (1 point) – The policy states the jurisdiction "may" or "considers" Complete Streets in their transportation planning and decision-making processes.

    - (0 points) – The policy language is indirect with regard to their intent to apply a Complete Streets approach, using language such as "consider Complete Streets principles or elements."

- 2 points: mentions the need to create a complete, connected, network.

    - (0 points) No mention.

- 2 points: specifies at least one motivation or benefit of pursuing Complete Streets.

    - (0 points) No mention.

- 1 point: specifies equity as an additional motivation or benefit of pursuing Complete Streets.

    - (0 points) No mention.

- 4 points: specifies modes, with a base of four modes, two of which must be biking and walking.

    - (0 points) Policy mentions fewer than four modes and/or omits biking or walking.

2. Diverse users

Complete Streets are intended to benefit all users equitably, particularly vulnerable users and the most underinvested and underserved communities. Transportation choices should be safe, convenient, reliable, affordable, accessible, and timely regardless of race, ethnicity, religion, income, gender identity, immigration status, age, ability, languages spoken, or level of access to a personal vehicle. Which communities of concern are disproportionately impacted by transportation policies and practices will vary depending on the context of the jurisdiction. Policies are not necessarily expected to list all of these groups. For example, some communities are more racially homogeneous, but have extreme income disparities. The best Complete Streets policies will specifically highlight communities of concern whom the policy will prioritize based on the jurisdiction's composition and objectives.

9 points available:

- 5 points: The policy language requires the jurisdiction to "prioritize" vulnerable users or neighborhoods with histories of systematic disinvestment or underinvestment. This could include neighborhoods with insufficient infrastructure or neighborhoods with a concentration of vulnerable users.

  - (3 points) Policy states its intent to "benefit" the neighborhoods or vulnerable users above, as relevant to the jurisdiction.

  - (1 point) Policy mentions or considers any of the neighborhoods or users above.

  - (0 point) No mention.

- 4 points: The policy establishes an accountable, measurable definition for priority groups or places. This definition may be quantitative (i.e. neighborhoods with X% of the population without access to a vehicle or where the median income is below a certain threshold) or qualitative (i.e. naming specific neighborhoods).

  - (0 point) No mention.

3. Commitment in all projects and phases

The ideal Complete Streets policy has a strong commitment that all transportation projects and maintenance operations account for the needs of all modes of transportation and all users of the road network.

10 points available:

For municipality/county policies

- 4 points: Policy requires all new construction and reconstruction/retrofit projects to account for the needs of all modes of transportation and all users of the road network.

    - (1 point) Policy considers or mentions these projects as opportunities to apply this policy.

    - (0 points) No mention.

- 4 points: Policy requires all maintenance projects and ongoing operations, such as resurfacing, repaving, restriping, rehabilitation, or other types of changes to the transportation system to account for the needs of all modes of transportation and all users of the road network.

    - (1 point) Policy considers or mentions these projects as opportunities to apply this policy.

    - (0 points) No mention.

For state/MPO policies

- 4 points: Policy requires all new construction and reconstruction/retrofit projects receiving state or federal funding to account for the needs of all modes of transportation and all users of the road network.

    - (1 point) Policy considers or mentions these projects as opportunities to apply this policy.

    - (0 points) No mention.

- 4 points: Policy requires all maintenance projects and ongoing operations, such as resurfacing, repaving, restriping, rehabilitation, or other types of changes to the transportation system receiving state or federal funding to account for the needs of all modes of transportation and all users of the road network.

    - (1 point) Policy considers or mentions these projects as opportunities to apply this policy.

    - (0 points) No mention.

For all policies

- 2 points: Policy specifies the need to provide accommodations for all modes of transportation to continue to use the road safely and efficiently during any construction or repair work that infringes on the right of way and/or sidewalk.

4. Clear, accountable exceptions

Effective policy implementation requires a process for exceptions to providing for all modes in each project. The exception process must also be transparent by providing public notice with opportunity for comment and clear, supportive documentation justifying the exception. The Coalition believes the following exceptions are appropriate with limited potential to weaken the policy. They follow the Federal Highway Administration's guidance on accommodating bicycle and pedestrian travel and identified best practices frequently used in existing Complete Streets policies.[1]

1. Accommodation is not necessary on corridors where specific users are prohibited, such as interstate freeways or pedestrian malls. Exclusion of certain users on particular corridors should not exempt projects from accommodating other permitted users.

2. Cost of accommodation is excessively disproportionate to the need or probable use. The Coalition does not recommend attaching a percentage to define "excessive," as the context for many projects will require different portions of the overall project budget to be spent on the modes and users expected. Additionally, in many instances the costs may be difficult to quantify. A percentage cap may be appropriate in unusual circumstances, such as where natural features (e.g. steep hillsides, shorelines) make it very costly or impossible to accommodate all modes. The Coalition does not believe a cap lower than 20 percent is appropriate, and any cap should always be used in an advisory rather than absolute sense.

3. A documented absence of current and future need.

4. Emergency repairs such as a water main leak that requires immediate, rapid response; however, temporary accommodations for all modes should still be made. Depending on severity of the repairs, opportunities to improve multimodal access should still be considered where possible.

Many communities have included other exceptions that the Coalition, in consultation with transportation planning and engineering experts, also feels are unlikely to create loopholes:

1. Transit accommodations are not required where there is no existing or planned transit service.

2. Routine maintenance of the transportation network that does not change the roadway geometry or operations, such as mowing, sweeping, and spot repair.

3. Where a reasonable and equivalent project along the same corridor is already programmed to provide facilities exempted from the project at hand.

In addition to defining exceptions through good policy language, there must be a clear process for granting them, preferably with approval from senior management. Establishing this within a policy provides clarity to staff charged with implementing the policy and improves transparency and accountability to other agencies and residents.

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[1] https://www.fhwa.dot.gov/environment/bicycle_pedestrian/guidance/design.cfm

8 points available:

- 4 points: Policy includes one or more of the above exceptions—and no others.
    - (2 points) Policy includes any other exceptions, including those that weaken the intent of the Complete Streets policy.
    - (0 points) No mention.
- 2 points: Policy states who is responsible for approving exceptions.
- 2 points: Policy requires public notice prior to granting an exception in some form. This could entail a public meeting or an online posting with opportunity for comment.

5. Jurisdiction

Creating Complete Streets networks is difficult because many different agencies control our streets. They are built and maintained by state, county, and local agencies, and private developers often build new roads. Individual jurisdictions do have an opportunity to influence the actions of others, through funding or development review. In the case of private developers, this may entail the developer submitting how they will address Complete Streets in their project through the jurisdiction's permitting process, with approval of the permit being contingent upon meeting the Complete Streets requirements laid out by the jurisdiction. Creating a Complete Streets network can also be achieved through interagency coordination between government departments and partner agencies on Complete Streets.

8 points available:

For municipality/county policies

- 5 points: A municipality's or county's policy requires private development projects to comply.

    - (2 points) A municipality's or county's policy mentions or encourages private development projects to follow a Complete Streets approach.

    - (0 points) No mention.

For state/MPO policies

- 5 points: A state's or Metropolitan Planning Organization's policy clearly notes that projects that address how they will account for the needs of all modes and users are prioritized or awarded extra weight for funding and/or inclusion in long-range transportation improvement plans (TIPs).

    - (2 points) A state's or MPO's policy mentions or encourages projects receiving money passing through the agency to account for the needs all modes and users.

    - (0 pointes) No mention.

For all policies

- 3 points: Policy specifies a requirement for interagency coordination between various agencies such as public health, housing, planning, engineering, transportation, public works, city council, and/or mayor or executive office.

    - (1 point) Policy mentions or encourages interagency coordination.

    - (0 points) No mention.

6. Design

Complete Streets implementation relies on using the best and latest state-of-the-practice design standards and guidelines to maximize design flexibility. Creating meaningful change on the ground both at the project level and in the creation of complete, multimodal transportation networks requires jurisdictions to create or update their existing design guidance and standards to advance the objectives of the Complete Streets policy.

7 points available:

- <u>5 points:</u> Policy directs the adoption of specific, best state-of-the-practice design guidance and/or requires the development/revision of internal design policies and guides.

    - (1 point) Policy references but does not formally adopt specific, best state-of-the-practice design guidance.

    - (0 points) No mention.

- <u>2 points:</u> Policy sets a specific time frame for implementation.

    - (0 points) No mention.

7. Land use and context sensitivity

An effective Complete Streets policy must be sensitive to the surrounding community including its current and planned buildings, parks, and trails, as well as its current and expected transportation needs. Specifically, it is critical to recognize the connection between land use and transportation. Complete Streets must be designed to serve the current and future land use, while land use policies and zoning ordinances must support Complete Streets such as by promoting dense, mixed-use, transit-oriented development with homes, jobs, schools, transit, and recreation in close proximity depending on the context. Given the range of policy types and their varying ability to address this issue, a policy, at a minimum, requires the consideration of context sensitivity in making decisions. The best Complete Streets policies will meaningfully engage with land use by integrating transportation and land use in plans, policies, and practices. The Coalition also encourages more detailed discussion of adapting roads to fit the character of the surrounding neighborhood and development, as well as the consideration of unintended consequences such as displacement of residents due to rising costs of living.

10 points available:

For municipality/county policies

- <u>5 points:</u> Policy requires new or revised land use policies, plans, zoning ordinances, or equivalent documents to specify how they will support and be supported by the community's Complete Streets vision

    - (4 points) Policy requires new or revised transportation plans and/or design guidance to specify how transportation projects will serve current and future land use, such as by defining streets based not just on transportation function but on the surrounding land use.

    - (2 points) Policy discusses the connection between land use and transportation or includes non-binding recommendations to integrate land use and transportation planning.

    - (1 point) Policy acknowledges land use as a factor related to transportation planning.

    - (0 points) No mention.

For state/MPO policies

- <u>5 points:</u> Policy requires new or revised long-range transportation plans and/or design guidance to specify how transportation projects will serve current and future land use such as by directing the adoption of place-based street typologies

    - (2 points) Policy discusses the connection between land use and transportation or includes non-binding recommendations to integrate land use and transportation planning.

    - (1 point) Policy acknowledges land use as a factor related to transportation planning.

    - (0 points) No mention.

For all policies

- <u>3 points:</u> Policy requires the consideration of the community context as a factor in decision-making.

    - (1 points) Policy mentions community context as a potential factor in decision-making.

    - (0 points) No mention.

- <u>2 points:</u> Policy specifies the need to mitigate unintended consequences such as involuntary displacement.

    - (1 points) Policy acknowledges the possibility of unintended consequences.

    - (0 points) No mention.

8. Performance measures

Communities with Complete Streets policies can measure success a number of different ways, such as miles of bike lanes, percentage of the sidewalk network completed, number of people who choose to ride public transportation, and/or the number of people walking and biking along a street. They can also measure the impact of Complete Streets on the other motivations and objectives specified in the policy, such as health, safety, economic development, resilience, etc. The best Complete Streets policies will establish performance measures in line with the goals stated in their visions. Performance measures should pay particular attention to how Complete Streets implementation impacts the communities of concern identified in the policy. By embedding equity in performance measures, jurisdictions can evaluate whether disparities are being exacerbated or mitigated. Policies should also set forth an accountable process to measure performance, including specifying who will be responsible for reporting on progress and how often these indicators will be tracked.

13 points available:

- 3 points: Policy establishes specific performance measures under multiple categories such as access, economy, environment, safety, and health.

    - (1 point) Policy mentions measuring performance under multiple categories but does not establish specific measures.

    - (0 points) No mention.

- 2 points: Policy establishes specific performance measures for the implementation process such as tracking how well the public engagement process reaches underrepresented populations or updates to policies and documents.

    - (1 point) Policy mentions measuring the implementation process but does not establish specific measures.

    - (0 points) No mention.

- 3 points: Policy embeds equity in performance measures by measuring disparities by income/race/vehicle access/language/etc. as relevant to the jurisdiction.

    - (1 point) Policy mentions embedding equity in performance measures but is not specific about how data will be disaggregated.

    - (0 points) No mention.

- 2 points: Policy specifies a time frame for recurring collection of performance measures.

    - (0 points) No mention.

- 2 points: Policy requires performance measures to be released publicly.

    - (0 points) No mention.

- 1 point: Policy assigns responsibility for collecting and publicizing performance measures to a specific individual/agency/committee.

    - (0 points) No mention.

9. Project selection criteria

A Complete Streets policy should modify the jurisdiction's project selection criteria for funding to encourage Complete Streets implementation. Criteria for determining the ranking of projects should include assigning weight for active transportation infrastructure; targeting underserved communities; alleviating disparities in health, safety, economic benefit, access destinations; and creating better multimodal network connectivity for all users. Jurisdictions should include equity criteria in their project selection process and give the criteria meaningful weight.

8 points available:

- 5 points: Policy establishes specific criteria to encourage funding prioritization for Complete Streets implementation.

    - (1 point) Policy mentions revising project selection criteria to encourage Complete Streets implementation.

    - (0 points) No mention.

- 3 points: Policy specifically addresses how equity will be embedded in project selection criteria.

    - (0 points) No mention.

10. Implementation steps

A formal commitment to the Complete Streets approach is only the beginning. The Coalition has identified key steps to implementation:

1. Restructure or revise related procedures, plans, regulations, and other processes to accommodate all users on every project. This could include incorporating Complete Streets checklists or other tools into decision-making processes.

2. Develop new design policies and guides or revise existing to reflect the current state of best practices in transportation design. Communities may also elect to adopt national or state-level recognized design guidance.

3. Offer workshops and other training opportunities to transportation staff, community leaders, and the general public so that everyone understands the importance of the Complete Streets vision. Training could focus on Complete Streets design and implementation, community engagement, and/or equity.

4. Create a committee to oversee implementation. This is a critical accountability measure, ensuring the policy becomes practice. The committee should include both external and internal stakeholders as well as representatives from advocacy groups, underinvested communities, and vulnerable populations such as people of color, older adults, children, low-income communities, non-native English speakers, those who do not own or cannot access a car, and those living with disabilities.

5. Create a community engagement plan that considers equity by targeting advocacy organizations and underrepresented communities which could include non-native English speakers, people with disabilities, etc. depending on the local context. This requires the use of outreach strategies such as holding public meetings at easily accessible times and places, collecting input at community gathering spaces, and hosting and attending community meetings and events. The best community engagement plans don't require people to alter their daily routines to participate. Outreach strategies should make use of natural gathering spaces such as clinics, schools, parks, and community centers.

15 points available:

- 3 points: Policy requires that related procedures, plans, regulations, and other processes be revised within a specified time frame.

    - (1 point) Policy mentions revising procedures, plans, regulations, and other processes.

    - (0 points) No mention.

- 3 points: Policy requires workshops or other training opportunities for transportation staff. Policy is specific about the timing and/or staff members for the training and workshops.

    - (1 point) Policy mentions workshops or other training opportunities for transportation staff.

    - (0 points) No mention.

- 3 points: Policy assigns responsibility for implementation to a new or existing

committee that includes both internal and external stakeholders that are representative of underinvested and vulnerable communities. Policy is specific about which internal and external stakeholders are/will be represented on the committee.

- (1 point) Policy assigns oversight of implementation to a specific body that may not include both internal and external stakeholders.

- (0 points) No mention.

- <u>6 points:</u> Policy creates a community engagement plan with specific strategies for who, when, and how they will approach public engagement in the project selection, design, and implementation process. Policy specifically addresses how the jurisdiction will overcome barriers to engagement for underrepresented communities.

  - (3 points) Policy creates a community engagement plan with specific strategies for who, when, and how they will approach public engagement but does not address underrepresented communities.

  - (1 point) Policy mentions community engagement but does not go into detail about specific strategies.

  - (0 points) No mention.

Additional elements

While Complete Streets policies are based on the principle of connecting people and place to transportation projects, many communities add language regarding environmental best practices or placemaking directives. Though the Coalition does not score these additional elements, we encourage agencies to consider cross-referencing related initiatives.

Point values

Vision and intent	12 points
Diverse users	9 points
Commitment in all projects and phases	10 points
Exceptions	8 points
Jurisdiction	8 points
Design	7 points
Land use and context sensitivity	10 points
Performance measures	13 points
Project selection criteria	8 points
Implementation steps	15 points
Total:	**100 points**