



# STATE OF CONNECTICUT

OFFICE OF POLICY AND MANAGEMENT  
INTERGOVERNMENTAL POLICY DIVISION

June 17, 2016

Mr. Mark Alexander  
Connecticut Department of Transportation  
Bureau of Policy and Planning  
2800 Berlin Turnpike, Newington, CT 06131

Re: Notice of Scoping:  
Safety and Operational Improvements on I-84

Dear Mark:

The Office of Policy and Management (OPM) has reviewed the Notice of Scoping for DOT's proposed I-84 Safety and Operational Improvements project and submits the following comments:

- While the project is described as "Safety and Operational Improvements on I-84", the project description justifies the new travel lane on I-84 WB by saying it is intended to "address existing congestion concerns and projected traffic volumes". Similarly, the first justification listed for adding a lane on I-84 EB is that it will "address congestion concerns". The project description does identify safety concerns, such as weaving and crashes, but to what extent are those largely concerns during congested periods?
- The project is within an area where the state has made substantial investments in transit infrastructure and operations, according to a comparison of the scoping notice's project area map with system maps for CTfastrak and CT Transit:

[http://www.cttransit.com/uploads\\_RTDivisionSystem/ctfastrak\\_system.pdf](http://www.cttransit.com/uploads_RTDivisionSystem/ctfastrak_system.pdf)  
[http://www.cttransit.com/uploads\\_RTDivisionSystem/web\\_sys\\_jul2015.pdf](http://www.cttransit.com/uploads_RTDivisionSystem/web_sys_jul2015.pdf)

Adding highway lanes to address congestion concerns can reduce the incentive for people who can use transit to actually use it. It might even undermine ongoing private, municipal and state investments in transit oriented development (TOD).

- Given the availability of alternative routes for those driving through the Hartford region and the expanded transit opportunities for local commuters, I-84 west of Hartford might be one of the state's better opportunities to improve traffic flow and safety without spending limited state and federal transportation funds for new highway lanes. As federal rules for interstate highway operations continue to evolve, has DOT considered whether there might be other options available in the future that could potentially address the subject project's purpose and need in a more cost effective manner than adding a new operational lane?
- In 9/2015 scoping comments regarding DOT's proposed I-91 – Rt 15 – I-84 interchange, OPM had expressed concern about scoping notices treating Hartford-area projects in

isolation from each other, without describing how individual projects fit into the broader picture. How does DOT evaluate the direct and indirect impacts of such projects on other segments of the highway network and on other transportation or environmental resources?

- There is an increasing recognition of the state's deferred infrastructure maintenance needs and of new infrastructure's impact on the state's long-term financial obligations. What operation and maintenance costs can be expected for this project's proposed new infrastructure?

Thank you for the opportunity to respond to this Notice of Scoping and please feel free to contact me if you have any questions.

Sincerely:



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