

Complete Streets Policy

Prepared by:

TOLEDO METROPOLITAN AREA COUNCIL OF GOVERNMENTS



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TMACOG Complete Streets Policy

1. Policy Background and Benefits

This policy recognizes the importance of planning, designing, operating, and maintaining a transportation system that is safe and efficient for users of all ages and abilities regardless of their mode of transportation. It encourages multimodal facilities by putting in place a mechanism that requires project sponsors receiving TMACOG-attributable federal funding to consider and evaluate and make every effort to include infrastructure that improves transportation options whenever feasible for pedestrians, bicyclists, and transit riders of all ages and abilities.

Building on a Tradition of Encouraging Mode Choice

TMACOG has long been a proponent of creating a multimodal, safe, and efficient transportation system that ensures accessibility to all roadway users. For more than a decade, TMACOG has supported complete streets as evidenced by several initiatives including creating a Growth Strategies Council, adopting a regional sidewalk policy, conducting a multimodal needs assessment, and incorporating complete streets projects and policies in its long range plans. Meanwhile at the regional and state level the number of jurisdictions which have developed and adopted complete streets ordinances or policies is growing rapidly. At the federal level, the U.S. Department of Transportation (U.S. DOT) issued an updated policy statement on Bicycle and Pedestrian Accommodation Regulations and Recommendations in 2010. It is U.S. DOT policy to “incorporate safe and convenient walking and bicycling facilities into transportation projects.” To accomplish this, U.S. DOT encourages transportation agencies to “plan, fund, and implement improvements to their walking and bicycling networks, including linkages to transit.” Members of the U.S. Congress have introduced complete streets language on several occasions.

Growth Strategies

In the early 2000s TMACOG formed a Growth Strategies Council to develop a regional growth strategy and support the coordination of land use planning across and among jurisdictions in the region. The result of this council’s activities is a 2003 statement of seven goals and fourteen principles related to smart growth ([TMACOG Growth Strategies](#)).

Regional Sidewalk Policy

After examining current design standards and regulations of the Ohio Department of Transportation (ODOT) as well as the guidelines and regulations of the Americans with Disabilities Act (ADA), the TMACOG Pedestrian and Bikeways Committee developed a *Regional Sidewalk Policy*. This policy is intended to serve as a general guideline of “best practices” for use by jurisdictions in the region when establishing or updating local policies and ordinances concerning installation and maintenance of sidewalks as well as policy enforcement. The *Regional Sidewalk Policy* serves as a guide for developers, builders, and others in the planning, design, and construction of sidewalks within new and existing developed areas ([TMACOG Sidewalk Policy](#)).

Multimodal Needs Assessment

In 2011 TMACOG conducted a *Multimodal Needs Assessment* to comprehensively review the balance between all transport modes and describe the integration among them. For this analysis, TMACOG created and used a physical inventory of all sidewalks in the region. This assessment concludes with several recommendations including a call to adopt a regional complete streets policy ([TMACOG Multimodal Needs Assessment.pdf](#)).

Long Range Planning

In its long range planning, TMACOG has consistently supported efforts towards a fully multimodal transportation system that is responsive to community needs including livability, environmental sustainability, and economic vitality. The *On The Move 2007-2035 Transportation Plan-Update 2011* contains many policies that deal with increased livability and sustainability. In particular it is regional policy to:

- consider adding pedestrian and bicycle facilities (paths, lanes, and routes) with roadway construction projects
- consider improving pedestrian and bicycle access as bridges are re-decked, rebuilt, or newly constructed. Bridges over (or underpasses of) major barriers – expressways, railroad tracks, and rivers – should be considered for inclusion of raised sidewalks and striped/signed bike lanes as part of a “complete streets” policy and to eliminate choke points
- provide education about and support adherence to the Uniform Vehicle Code
- support development of a passenger transportation system providing a full range of integrated, interconnected modal choices
- improve highway access and capacity for truck freight and reduce modal conflicts

Benefits of Complete Streets

Building complete streets benefits residents, business owners, developers, and the region as a whole. First and foremost, embracing the complete streets concept will create a more balanced transportation system by providing accessible, safe, and efficient connections between destinations. It will bolster economic growth and stability while increasing property values. It will ensure job growth, reduce crashes through safety improvements, improve public health and fitness, and reduce the overall demand on our roadways by allowing people to replace motor vehicle trips with active transportation options. Secondly, integrating sidewalks, bike facilities, transit amenities, or safe crossings into the initial design of a project spares the expense and complications of retrofits later. See the list of references appended to this policy for evidence concerning the benefits of complete streets.

This Complete Streets Policy builds upon previous local efforts and is informed by the growing trend among jurisdictions across the United States. It represents a key tool for ensuring a comprehensive transportation system that safely and comfortably accommodates all users by promoting a multimodal transportation system.

2. Definition

Complete streets are streets, highways, and bridges that are routinely planned, designed, operated, and maintained to safely and comfortably accommodate all transportation system users along and across the entire public right-of-way. This includes but is not limited to motorists, cyclists, pedestrians, transit and school bus riders, delivery and service personnel, freight shippers, and emergency responders. “All users” includes people school-aged to the elderly, and individuals of all abilities including those who use mobility aids.

3. Regional Vision

Create a measurably better transportation system that is more equitable, balanced, and effective and which offers every user of the public right-of-way safe, connected, and sustainable transportation options. This effort to make the system more complete will take advantage of opportunities presented by necessary reconstruction and expansion of the system whenever practicable.

The goals of this Complete Streets Policy are:

- A. To create a comprehensive, integrated, and connected transportation network that supports sustainable development and provides livable communities.
- B. To ensure safety, ease of use, and ease of transfer between modes for all users of the transportation system.
- C. To provide flexibility for different types of streets, areas, and users.

4. Policy

Policy Statement

- A. TMACOG will promote the complete streets concept throughout the region and, therefore, recommends that all local jurisdictions and the state adopt comprehensive complete streets policies, consistent with the regional Complete Streets Policy. TMACOG will seek incorporation of the complete streets concept and policy into the development of all transportation infrastructures within the region at all phases of their development, including planning and land use control, scoping, design approvals, implementation, and performance monitoring.
- B. TMACOG requires that projects that request TMACOG-attributable federal funding through the Surface Transportation Program (STP projects) adhere to this policy. TMACOG members receiving such TMACOG-attributable federal funding shall fill out the checklist accompanying this policy.
- C. TMACOG encourages local and state jurisdictions/organizations to review and revise their local ordinances/policies to reflect complete streets design guidelines and to apply these guidelines to local projects as appropriate. In addition, projects utilizing other funding sources are also encouraged to adhere to this policy. TMACOG encourages private developers to apply complete streets principles to their projects. TMACOG also

encourages neighboring regions to utilize these principles to ensure connectivity across jurisdictions and regions.

Applicability

This Complete Streets Policy applies to all projects, including the new construction, reconstruction, rehabilitation, repair, maintenance, or planning of roadways, trails and other transportation facilities that will use federal funds allocated through TMACOG. Only projects which qualify for one of the exceptions listed in the Exceptions section below will be allowed to deviate from the policy and still receive TMACOG-controlled federal funds.

Projects that are within the federal aid urbanized area or within defined urbanized clusters will likely require different approaches than those in rural areas. Some projects, especially those in rural areas, may require no additional complete streets treatments if it is determined during the application review phase that no current or projected need justifies such treatment. Consistent with current federal law, the primary purpose of all projects funded under this policy will be to enhance transportation choices in the region; no projects will be funded that are purely recreational in nature. Please note that this is a regional policy that does not, and cannot, address a wide variety of possible street treatments and amenities that may be desirable, but the specifics of which are beyond the purview of a regional policy.

Review Process –A Complete Streets Checklist that is separate from the project scoring criteria accompanies this policy serves to help sponsors document how their project addresses complete streets requirements. Project sponsors will be required to respond to the Checklist questions as part of completing the funding application itself. The TMACOG Project Scoring Criteria for Transportation Improvement Program (TIP) Analysis is used to score funding applications and includes points for complete streets elements. Projects which have been granted an exception to providing pedestrian, bicycle, or transit facilities will not incur a penalty and the project will be scored and ranked for funding on the rest of its merits.

All requests for exceptions to complete streets treatments shall be documented with supporting data which indicates the basis for the request. Exceptions will be granted after review by TMACOG staff and the Transportation Improvement Program (TIP) committee. If not granted, the reason will be explained in writing by TMACOG staff. TMACOG staff will maintain publicly available information describing the nature and extent of the compliance with the Complete Streets Policy. All efforts will be made to identify a mutually acceptable alternative. The appeals process described below would be used in those instances where an agreement cannot be reached.

Appeal Process – Project sponsors may request an exception or re-review of their projects by the **Complete Streets Appeals Committee** if they cannot reach an agreement with TMACOG staff and/or the Transportation Improvement Program committee.

The Complete Streets Appeals Committee will consist of five (5) people who are appointed by the Transportation Council chair for two-year terms. Members may be reappointed for successive terms. The voting membership consists of two (2) representatives of jurisdictions, one

(1) representative of a transit agency, and two (2) members who are professional engineers. This committee is supported by one (1) nonvoting TMACOG staff member.

The Appeals Committee will meet on an “as needed” basis. TMACOG staff will review the requests initially and provide a report with recommendations to the Appeals Committee in advance of each meeting. The applicant will have the opportunity to review the report and add comments prior to its submittal to the Appeals Committee. During each meeting the Appeals Committee shall discuss and evaluate the request(s) and vote on a recommendation. Appeals Committee meetings will be open to the public and the applicant to attend.

A quorum will consist of three (3) voting members and a majority vote is needed to act. Members with conflicts of interest on a particular project before the committee must recuse themselves from deliberation on that project and an alternate member will be assigned for that project. In the event that the sponsor disagrees with the action of the Appeals Committee, the sponsor may appeal to the TMACOG Transportation Council chair who may or may not elect to hear the appeal request in front of the entire committee.

Instead of an exception, the Appeals Committee may also suggest a lesser level of accommodation. All exceptions will be kept on record and made publicly available.

Exceptions

If the project sponsor determines that additional complete streets treatments are not warranted, they may request an exception for one or more of the following reasons:

- A. Where bicyclists and pedestrians are prohibited by law from using the roadway. Bicycles and pedestrians are legally permitted to travel on or along all streets and roads in Ohio with the exception of limited access freeways and highways.
- B. Where the street or road is already adequately designed to accommodate all users, and thus is complete without further enhancements. To qualify for this exception, the project sponsor must document how this street or road currently addresses the needs of all users.
- C. Where the cost of establishing bikeways or walkways would be excessively disproportionate to the need or probable use. In accordance with federal guidelines, excessively disproportionate is defined as exceeding 20 percent of the cost of the total transportation project (including right-of-way acquisition costs). This exception must consider probable use through the life of the project—usually a minimum of 20 years for roadways and 50 or more years for bridges.
- D. Where the project consists of maintenance, repair, or resurfacing of an existing cross-section only. However, resurfacing projects often offer a low-cost opportunity to adjust lane width or add a bike lane simply by changing the pavement markings on a road, and therefore resurfacing projects should, at the discretion of the project sponsor, be considered an opportunity to make a street or road more complete. Projects that include adding lanes, shoulders, or involve replacement of the full pavement structure are not considered maintenance or repair and do not qualify for this exception.
- E. Where the project consists primarily of the installation of traffic control or safety devices and little or no additional right-of-way is to be acquired. However whenever new traffic

control detection devices are installed they must be capable of detecting bicycles. All new pedestrian crossing devices must also meet the most current accessibility standards for controls, signals, and placement.

- F. Where the Average Daily Traffic count (ADT) is projected to be less than 1,000 vehicles per day over the life of the project and legal speeds are 25 mph or less. Where traffic is light, but speeds are higher, motorists must have adequate sight distance and the opportunity to change lanes to pass a bicycle or pedestrian for a road to be complete without additional design elements.
- G. Where scarcity of population or other factors indicate an absence of need for current and future conditions. This exception must take the long view and consider probable use through the life of the project—usually a minimum of 20 years for roadways and 50 or more years for bridges.
- H. Where roadway standards or bicycle and pedestrian standards cannot be met. There are times bicycle and pedestrian facility standards cannot be met due to roadway topographic constraints or if a project sponsor can demonstrate that it is impractical to make the street safe for shared use. For example, roads with a combination of extremely high traffic volume (18,000+ vehicles a day), constrained and fixed right-of-way, and posted speeds of 45 mph or more may need special consideration.

Non-standard treatments for bicycle and pedestrian accommodations should be reviewed for possible inclusion into roadway projects like these to avoid not having any bicycle and pedestrian accommodations, or an alternate route in the same corridor should be identified and marked.

The high traffic exception is highly problematic because high traffic volume is often an indication that a road is the most direct connection between multiple origins and destinations, and pedestrians, cyclists, and transit users should not be denied access to those destinations. In order for this exception to be granted, the project sponsor should identify alternate routes that are in the same traffic corridor and that allow pedestrians, cyclists, and people with disabilities access to significant destinations and, as necessary, make improvements to those alternate routes (for example: signage, bike boulevard treatments, shared used spurs, shared-lane markings, etc.).

Cyclists, pedestrians, transit riders, and people with disabilities must also be able to cross these high-volume roads safely so that these roads do not become barriers to non-motorized use. High-volume, wide roads can have the unintended impact of dividing a community. To accommodate crossing of very wide, multi-lane roads, signal timing may need to be adjusted to accommodate users who walk more slowly. Countdown timers, and/or mid-point safety islands may need to be installed, and highly visible signage and crosswalk markings may need to be added. Accommodations for cyclists crossing these roads should also be considered, including bicycle detection devices at traffic signals and mid-point safety islands where multi-use paths cross busy roadways.

Requirements

Rather than dictate specific designs, this Complete Streets Policy will ensure that all current and projected users of the public right-of-way should be able to safely and conveniently reach their destinations along and across a street or road, regardless of their chosen mode of transportation, in order for that street or road to be considered “complete.” This outcome can be achieved through the following methods:

- Each project shall use the most appropriate design standards and procedures. For projects using TMACOG-attributable federal funding, it will be necessary to meet or exceed standards and procedures acceptable to the Ohio DOT and U.S. DOT, such as the *Ohio Department of Transportation’s Project Development Process and Location & Design Manual*. Other standards such as those developed by the American Association of State Highway and Transportation Officials (AASHTO), The Americans with Disabilities Act (ADA) and federal and state Environmental Protection Agencies (EPA) shall be used as appropriate.
- Project sponsors shall fill out the checklist accompanying this policy and provide the completed form along with applications to the TMACOG Transportation Improvement Program (TIP).
- Designs shall include accommodation of all users and be sensitive to the context of the project setting. It is important to note that complete streets may look different for every project and road type. For example, wide lanes or paved shoulders may be sufficient in a rural area, whereas sidewalks and/or bike lanes are needed in an urban setting. Also, when re-striping projects are considered, where the right-of-way will not change, options such as bike lanes, sharrows, and pedestrian crosswalks could still be implemented.
- A systems approach shall be used in developing roadway projects, especially to ensure coordination with nearby jurisdictions, projects, and plans irrespective of the project sponsor.
- If there is another project planned or in development near this project the two should be coordinated to ensure consistency in the facilities serving the corridor.
- Logical termini should be chosen to include connections through “pinch points,” such as overpasses, railroad crossings, and bridges. Logical termini should not be chosen so that the project ends before such a “pinch point” unless there is a compelling reason to do so.
- If the project serves a destination point, such as a school, recreational facility, shopping center, hospital, or office complex, the project shall provide the opportunity to have access to the destination’s pedestrian and bicycle facilities.
- Where applicable, projects shall involve the local transit agency to ensure that sufficient accommodation of transit vehicles and access to transit facilities is provided.
- Public transit facilities shall be designed with the goals of complete streets in mind, by including sidewalks, bicycle connections, or secure bicycle parking, among other strategies.
- Every project shall provide the opportunity for utility/telecommunications infrastructure to be appropriately accommodated to allow for existing and future growth. Efficient use

of right-of-way during construction and maintenance should be considered to improve access to utility systems, including future broadband networks. This policy is not intended to create new rights for utilities outside those provided by existing law and contract.

- Every project shall ensure that the provision of accommodations for one mode does not prevent safe use by another mode (e.g., a bus shelter should not block the clear walking zone on the sidewalk).

5. Recommendations

- All users should be considered during the entire life cycle of a project, including planning, design, construction, operations, and maintenance.
- Street furniture, such as bike racks or benches, and lighting should be considered as part of all projects as long as they do not impede any user. Wayfinding signage for drivers and pedestrians should be considered.
- When designing a facility that includes or crosses an existing or future transit route (including the possibility of light rail and/or street car modes), ensure that the appropriate pedestrian and wheelchair access and lighting is provided to and from the transit stops.
- Traffic-calming elements including, but not limited to, landscaping, street trees, and roundabouts should be considered where safe and appropriate.
- Project sponsors should consider including street trees and landscape components, with careful analysis of tree, site, and design considerations. Landscape and infrastructure components designed to retain, infiltrate and treat stormwater should be incorporated into project designs where safe and appropriate. Designs may include bioswales, stormwater planters, pervious pavers, and other features that manage stormwater and enhance the aesthetics of the streetscape. Careful consideration should be given to plant selection, design, and installation.
- Special consideration should be given to future planned facilities or services.
- Goods movements and deliveries should be considered across all freight modes. Truck parking facilities and truck turning needs should be considered as a means to alleviate congestion and improve safety.
- Traffic signal preemption techniques near railroad crossings should be considered for vehicular and pedestrian traffic.
- Each project design should be coordinated with appropriate access management strategies. Access management strategies should consider the placement of sidewalks and ramps to eliminate sight distance issues.
- Although this policy focuses on engineering projects, the project sponsor should provide education, encouragement, and enforcement strategies during or after the project. The education component should include government officials, developers, and the public. Resources posted on the TMACOG website provide best practices, ideas, and resources to help with these efforts. (See Implementation section.)

- While this policy focuses on transportation, local governments should review their land use and zoning policies to provide for mixed land use developments and projects that provide direct non-vehicular connections within a given development.
- Each local community should regularly update its project design standards and procedures and train its staff to adhere to them.

Local governments are encouraged to adopt their own complete streets policies, consistent with this regional policy and federal and state design standards. State governments should work with the local Metropolitan Planning Organizations to ensure consistency in policies at the state, regional, and local level.

6. Implementation

Upon approval and adoption of this Complete Streets Policy, it will become part of TMACOG's planning process and the scoring process for TMACOG-attributable funding project selection. The principles of this policy will also guide TMACOG staff in the preparation of the Regional Transportation Plan and other plans it prepares or to which it contributes.

Context-appropriate facilities will be designed to the best currently available standards and guidelines. Policy guidance and resources will be posted on the TMACOG website to assist project sponsors in developing Complete Streets projects. This guidance will contain model policies, sample design standards, examples for land use and zoning practices, educational and enforcement strategies, and information on other resources. TMACOG will coordinate educational opportunities for jurisdictional technical staff on current design standards and appropriate complete streets alternatives.

7. Performance Measures

The success of this policy will be measured in the following quantitative ways:

- Increase in the percentage of project applications that request TMACOG-attributable federal funding and which include complete streets elements
- Increase in total number of miles of on-street bicycle facilities, defined by streets and roads with clearly marked or signed bicycle accommodations
- Increase in the percentage of transit stops accessible via sidewalks and curb ramps
- Increase in member jurisdictions which adopt complete streets policies
- Increase in number of jurisdictions in the region achieving or pursuing Bike-Friendly Community status from the League of American Bicyclists, or Walk-Friendly Community status from walkfriendly.org.

The success of this policy will be measured in the following qualitative ways:

- Surveys of bicyclists, pedestrians, motorists, people with disabilities, and transit users concerning their ability to reach desired destinations safely and conveniently
- Surveys of project sponsors concerning the value and fairness of this policy

8. Evaluation

TMACOG shall, at a minimum, evaluate this policy and the documents associated with it periodically and in parallel with the TMACOG Long Range Transportation Plan revision. This evaluation may include recommendations for amendments to the Complete Streets Policy and subsequently be considered for adoption by the Planning Committee of TMACOG utilizing its then current public and member involvement procedures.

Complete Streets References

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TMACOG Complete Streets Checklist

This checklist accompanies the TMACOG Complete Streets policy. It is to be completed when applying for TMACOG-attributable federal funding through the TMACOG Transportation Improvement Program (TIP).

The purpose of this checklist is to ensure that all users have been considered in a given project. For projects using TMACOG-attributable federal funding of the Surface Transportation Program (STP), it will be necessary to meet or exceed standards and procedures acceptable to the Ohio DOT and U.S. DOT, such as the Ohio Department of Transportation's Project Development Process and Location & Design Manual. Information on various guidelines and standards is listed on the TMACOG Complete Streets website.

One of the goals of TMACOG's Complete Streets Policy is to provide flexibility for different types of streets, areas, and users. This means that a complete street in a rural area may look very different from a complete street in an urban area.

A. Existing conditions

1. Explain how the project area currently accommodates pedestrians (including ADA compliance), bicyclists, and transit users.

2. Explain how the proposed project will accommodate them once completed.

3. Please describe the existing character of the project area, including land use, adjacent land use, estimated pedestrian and bicycle traffic, any unofficial walking paths, density of development, street furniture/lighting, landscaping, street trees, perceived safety issues, transit routes and stops.

B. Safety

1. Briefly explain how the project will improve safety. TMACOG strongly encourages sponsors of intersection safety projects to conduct a crash study and provide results. Your crash information also needs to include the number of pedestrian and bicycle crashes by severity, as well as if the project area includes any locations (corridors or intersections) that are on TMACOG's and/or ODOT's high-crash lists.

C. Connectivity

1. Project limits should be selected so that they can accommodate existing and future connections. In this regard, were logical termini chosen to include connections through "pinch points" such as overpasses, railroad crossings, and bridges? If the project touches another jurisdiction, was a systems approach taken? Were cross-jurisdictional connections considered? Please explain:

TMACOG Complete Streets Checklist

2. Does the project area include recommendations that are contained in any of the following plans or policies?

Please check all that apply.

- TMACOG Long Range Transportation Plan
- Safe Routes to School travel plans
- TMACOG Sidewalk Policy
- ADA Transition plans
- Bikeway plans
- Freight plans
- Short-range and/or long-range transit plans
- ODOT plans
- Any neighborhood or mobility plans
- Any other plans, e.g., comprehensive plans. If yes, how does your project fulfill any of these plans?
Please specify the plan name(s).

D. Complete Streets Attributes

1. Please cite the specific design guidance or resources which relate to Complete Streets used in developing the scope of the project. Examples may include appropriate sections of the *American Association of State Highway and Transportation Officials (AASHTO) Green Book*, the *Manual of Uniform Traffic Control Devices (MUTCD)*, etc.

2. Transit accommodations to the extent needed should be handled in consultation with the local transit authority. Have you consulted your local transit agency to ensure that transit vehicles will be accommodated and access to transit facilities provided? Please explain:

3. Has a speed study been conducted for the street/corridor? Please consider project conditions and context to determine if a speed study is necessary.

- Yes
- No

4. Has a parking study been conducted for both on-street and off-street parking? Please consider project conditions and context to determine if a parking study is necessary.

- Yes
- No

5. How will the project consider future utility/telecommunications needs?

TMACOG Complete Streets Checklist

6. Which, if any, of the following items will be incorporated in the project? Please check all that will apply.

Pedestrian

- Pedestrian Facilities- Both Sides of Street
- Pedestrian Facilities- One Side of Street
- Sidewalk with ADA-Compliant Curb Ramps
- Signalized Crosswalk
- Marked Crosswalk with Signage, Including Mid-Block Crossing
- Pedestrian Detectors
- Audible Signals
- Shoulder (in Rural Areas)

Bicycle

- Bicycle Facilities
- Bike Lanes
- Shared-Lane Markings / Sharrows
- Shared Bike-Bus Lane
- Bicycle Signage (e.g., designated bike route)
- Secure Bicycle Parking
- Bicycle Detectors
- Multi-Use Path

Stormwater Management

- Bioswales
- Stormwater Planters
- Pervious / Permeable Pavement Options

Transit

- Transit Facilities
- Priority Bus Lane
- Bus Stop, including Paved Passenger Waiting Area
- Bus Passenger Shelter
- Bus Pads
- Light Rail or Street Car

Traffic Calming

- Traffic Calming Elements
- Landscaping, including Street Trees
- Narrower Traffic Lanes
- On-Street Car Parking
- Other Physical Changes (e.g., Chicanes, Curb Extensions, Medians, Islands)

Other

- Lighting
- 911 Call Boxes
- Other(s) (please explain)

E. Exceptions

7. If no pedestrian, bicycle, or transit facilities are being provided, please explain why (see **Exceptions** section in TMACOG Complete Streets Policy). Include a statement as to how the needs of all users are being addressed within the same corridor as the project.

F. Other

8. Is there additional information to provide about the project that is unique or wasn't captured previously with regard to the Complete Streets Policy?

See TMACOG website for resources and policy guidance regarding complete streets. Attach additional sheets as necessary.