



Smart Growth America  
Improving lives by improving communities



National Complete Streets Coalition

# The Complete Streets Policy Framework



## Writing a strong Complete Streets policy

Once someone gets familiar with the basic concept of Complete Streets—streets designed and maintained to serve the needs of everyone—the next step is understanding the role that a policy plays in getting there. So what exactly goes into an effective and strong Complete Streets policy? There are 10 discrete elements identified by the National Complete Streets Coalition.

1. Establishes commitment and vision
2. Prioritizes underinvested and underserved communities
3. Applies to all projects and phases
4. Allows only clear exceptions
5. Mandates coordination
6. Adopts excellent design guidance
7. Requires proactive land-use planning
8. Measures progress
9. Sets criteria for choosing projects
10. Creates a plan for implementation

If you or your community is aiming to begin the hard but vital work of passing a policy, this short guide is the best place to start. Each of the 10 elements are covered in detail on the following pages, including the scoring details used to evaluate the potential effectiveness of a Complete Streets policy. (New to Complete Streets? For more of the basics on the concept and the Coalition, please visit [completestreets.org](https://completestreets.org))

## A brief history of the Complete Streets policy framework

Having coined the term “Complete Streets” in the early 2000s, the nascent **National Complete Streets Coalition**



National Complete Streets Coalition

succeeded in popularizing a fresh approach to street design that prioritizes making streets safe for people of all ages and abilities, however they get around. But by the mid-2010s, as pedestrian fatalities increased to historic levels, the Coalition realized that many of the policies being passed were failing to have the desired effect of making streets safer. Most alarmingly, the crisis of people being struck and injured or killed while walking or biking was not felt evenly—people of color and people in lower-income areas were being killed disproportionately.

There were two primary reasons that the policies weren't having the fullest effect: **First**, the early versions of these policies lacked accountability measures to ensure that the Complete Streets policies were fully put into practice. **Second**, most policies failed to specify and require the incredibly difficult work of institutionalizing the approach, such as training agency staff, traffic engineers, and project managers.

It's worth noting that Complete Streets represents a massive paradigm shift from a status quo that prioritizes moving vehicles quickly at almost any cost. And these limitations in the early policies also came against a backdrop of the federal approach to street design that continued to prioritize speed above safety. This is why, in addition to our primary role encouraging strong local, state, or federal Complete Streets policies, as part of a broader team within Smart Growth America, we work

more expansively on improving safety by pressing for changes to the transportation design guides, models, and measures that contribute to producing streets that are dangerous by design.

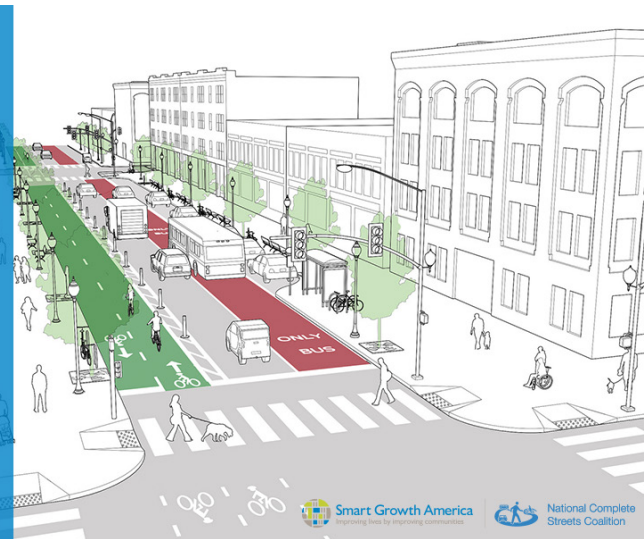
While the Coalition succeeded in putting this vital, brand new concept on the map, fostering a powerful movement from coast to coast, and encouraging local and state governments to reconsider their approaches to street design, it was also time to re-evaluate what should go into a strong Complete Streets policy.

So in 2018, the Coalition produced an improved framework for Complete Streets policies that requires binding language and more accountability to ensure that any policy produces tangible changes and prioritizes the needs of underinvested and underserved communities.

**The Complete Streets Policy Framework** you read here, produced in 2023, represents the current best practices for creating a strong policy that can be implemented at any level of governance. It's the go-to policy framework to guide any community who wants to develop their own policies.

The full content of this document is also available in a series of sharable, individual posts online: <https://smartgrowthamerica.org/10-elements-of-complete-streets/>

## The Best Complete Streets Policies



The Best Complete Streets Policies, issued regularly by the National Complete Streets Coalition, scores all policies using this 10-element framework to evaluate and uplift the best Complete Streets policies from across the country which can serve as a model for other communities.

<https://smartgrowthamerica.org/best-complete-streets>

## ELEMENT 1.

# Establishes commitment and vision



How and why does the community want to complete its streets? This specifies a clear statement of intent to create a complete, connected network and consider the needs of all users.

## Element #1: A strong Complete Streets policy establishes commitment and a vision

**How and why does a community want to complete its streets? Clear answers to that question—an unmistakable and binding statement of intent—are the vital first element for creating a complete, connected network of streets that considers the needs of all users.**

Every policy is an opportunity for a jurisdiction to make its intentions and motivations clear to the public as they craft, develop, and prioritize their rationale for adopting a Complete Streets policy. No two communities are identical, and no two Complete Streets policies should be exactly the same either.

### Why is this element integral to a strong Complete Streets policy?

Every successful effort to do something markedly different—whether that’s a new approach to street design or designing a longer-lasting light bulb—starts with the “why” and the “how.” Starting a policy with a clear statement of intent and commitment to Complete Streets accomplishes several vital purposes: It makes the intentions crystal clear to a public who can provide accountability. It shapes or directs the community’s approach to its transportation practices, policies, and decision-making processes. And it provides a necessary foundation for the rest of the policy.

### What does this element look like in practice?

In practical terms, a commitment and vision means that the policy uses clear, binding, and enforceable language like “shall” or “must” in the legislative text itself, rather than words like “may” or “considers.”

In the earliest years of this movement, a large share of the Complete Streets policies adopted across the country were non-binding resolutions. This was not good enough for a community that truly wanted to build Complete Streets. Policies that are binding and not just “optional” are proven to make a tangible difference in what gets built, how, and where.

The policy must clearly acknowledge the need for building a complete, connected, comprehensive transportation network and explicitly state the tangible benefits of ensuring all people can comfortably travel to and from their destinations safely, in a reasonable amount of time, without breaking the bank.

Most notably, and improving upon the standards that policies were held to a decade ago, equity—which includes the consideration of race, income, and physical ability—should be a core motivation for pursuing a Complete Streets policy.

The policies that receive the maximum point value from this area also mention several transportation modes and specifically call out biking and walking. Why those modes specifically? Because a Complete Streets policy is both about prioritizing the most vulnerable users of the transportation system (people walking, rolling, and biking), and fostering

a paradigm shift away from prioritizing speedy car travel, the status quo of transportation planning for the last 60-plus years.

Complete Streets policies also work best when the policy reflects a community's own unique vision and needs. While each policy calls for a commitment to diverse users and abilities, communities should also articulate their own particular visions of economic, equitable, sustainable, healthy, safe, and livable futures. The process of writing and adopting a Complete Streets policy provides a valuable opportunity for the community to come together and articulate their deeply held values and a shared vision, building a foundation of support to advocate for the longer-term changes that a strong policy requires. By setting out a clear vision and committing to realizing it, communities can create better policies that reach their most pressing, unique needs—and their most vulnerable populations.

### Policy scoring details

In our framework for evaluating and scoring Complete Streets policies, this element is worth a total of **12 out of 100** possible points. This element is the third most valuable of the 10 in part because it provides a foundation for the other elements and establishes the clear and binding commitment by the jurisdiction to institutionalize a Complete Streets approach. Without binding language, the other elements lose their potential value.

- **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.

## ELEMENT 2.

# Prioritizes underinvested and underserved communities



Requires jurisdictions to define who are their most underinvested and underserved communities and prioritize them throughout.

## Element #2: A strong Complete Streets policy prioritizes underinvested and underserved communities

**Building a complete and connected transportation network requires investing in places and people that have not received investment.**

**The strongest Complete Streets policies will specifically prioritize underinvested and underserved communities based on the jurisdiction's composition and objectives.**

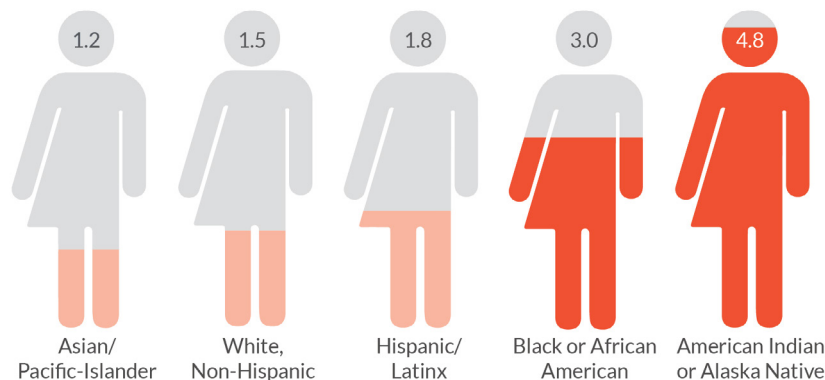
### Why is this element integral to a strong Complete Streets policy?

A core goal of the Complete Streets approach is to create a complete and connected transportation network. And a network is only as strong as its weakest points—its gaps. In order to achieve a connected network, a jurisdiction needs to allocate its often-limited resources most efficiently and equitably: by first focusing on these gaps. The gaps are likely to be places that have been systematically under-invested in because the people living there were discriminated against, ignored, or deprioritized. The strongest Complete Streets policies will therefore first fund and address gaps in their network.

The U.S.'s history of systemic discrimination, oppression, and exclusion, especially based on race, income, and ability, is part of the transportation context and cannot be ignored. For example, inadequate transportation safety investments in predominantly Black communities stem from government-sanctioned segregation and [redlining practices](#). This has resulted in white neighborhoods receiving disproportionately larger benefits of safe, convenient, reliable, affordable infrastructure,

while [Black communities continue to suffer from underinvestment](#). At the national level, we see certain populations [disproportionately represented in traffic fatalities](#)—people of color, particularly Black and Native Americans; older adults; and people walking in low-income neighborhoods are struck and killed at much higher rates than other populations.

### Pedestrian deaths per 100,000 by race & ethnicity (2016-2020)

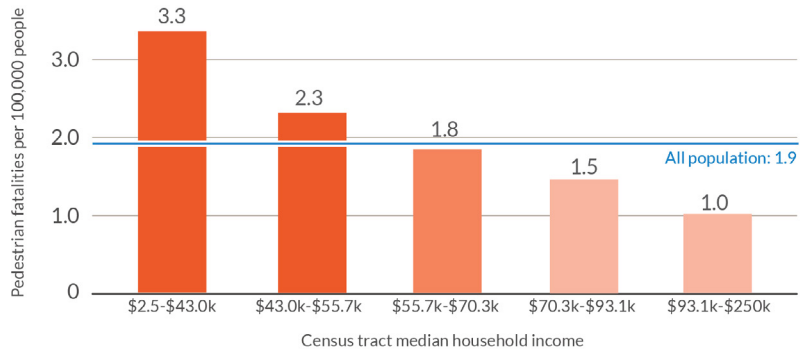


From *Dangerous by Design*. <https://smartgrowthamerica.org/dangerous-by-design/>

All people should have options for getting around that are 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. This requires focusing attention on the communities and places that have not been appropriately or adequately invested in.



## Pedestrian fatalities per 100,000 people by census tract income



From *Dangerous by Design*. <https://smartgrowthamerica.org/dangerous-by-design/>

This policy element holds jurisdictions accountable for including equity in their plans based on the composition and objectives of the community. The communities that are disproportionately impacted by transportation policies and practices will vary depending on the context of the jurisdiction.

### What does this element look like in practical terms?

The jurisdictions with the strongest Complete Streets policies will do two things: 1) define their priority groups (the communities or areas that have been underinvested and underserved), and 2) prioritize those communities.

Defining who you consider your underinvested and underserved communities is crucial to a strong policy. For example, It's one thing to say that you are going to prioritize certain areas or communities, but

if you aren't clear on who those communities are, those reading your policies will come to their own conclusion on who they think should be included within that group. It's important to be specific and qualitatively or quantitatively define which groups are included in the definition of underinvested and underserved communities. Below are some examples of qualitative and quantitative definitions.

- **Qualitative:** older adults, people with disabilities, specific neighborhoods with historic disinvestment, low-income neighborhoods
- **Quantitative:** census tract(s) with X% of people below the poverty line, X% of individuals with a disability, X% of households without access to a vehicle

In order to remedy inequities, this policy element requires the jurisdiction to equitably invest in its transportation network by ensuring underinvested and underserved communities are considered above and beyond others.

## Policy scoring details

In our framework for evaluating and scoring Complete Streets policies, this element is worth a total of **9 out of 100** possible points.

- **4 points:** The policy establishes an accountable, measurable definition for priority groups or places. This definition may be quantitative (e.g. neighborhoods with X% of the population without access to a vehicle or where the median income is below a certain threshold) or qualitative (e.g. naming specific neighborhoods).
  - (0 points) No mention.
- **5 points:** The policy language requires the jurisdiction to “prioritize” underinvested and underserved communities. This could include neighborhoods with insufficient infrastructure or neighborhoods with a concentration of people who are disproportionately represented in traffic fatalities.
  - (3 points) Policy states its intent to “benefit” people in the underinvested and underserved communities, as relevant to the jurisdiction.
  - (1 point) Policy mentions or considers any of the neighborhoods or users above.
  - (0 points) No mention.

**ELEMENT 3.**

# Applies to all projects and phases



Instead of a limited set of projects, the policy applies to all new projects, retrofit or reconstruction projects, maintenance projects, and ongoing operations.

### Element #3: A strong Complete Streets policy applies to all transportation projects, in every phase

**To which projects or streets should a Complete Streets policy apply? If the policy is a strong one, then it dictates a holistic approach to every transportation project, in every place, in every phase of work. This means the application of a policy will also look different based on context.**

#### Why is this element integral to a strong Complete Streets policy?

There are two big reasons that our policy framework includes this third element requiring that any policy applies to all projects and phases.

**First, Complete Streets is not just a set of projects, it's a holistic approach and process to the transportation system,** which by definition, applies to all kinds of projects. Getting to Complete Streets requires more than just isolated projects here and there. It requires building a complete network of streets that are safe for all users. Doing this demands a new paradigm to the entire transportation system, so a strong policy will be applied to every project, not just the “convenient” ones, for example. (Exceptions may sometimes exist, but they are limited. Read more in element #4.)

**Second, Complete Streets are never just an add-on component or a design feature tacked on at the end of the same old conventional road-building project.** The strongest, most effective policies apply to every phase of any project's development, including planning, design,

construction, operation, and maintenance. Instead of, for example, applying Complete Streets elements after a project's purpose has already been scoped or defined, such as tacking on some features late in the design process.

#### What does this element look like in practical terms?

The policy element is very clear that every transportation project—including every maintenance operation—accounts for the needs of all modes of transportation and users of the road network.

Instead of applying only to certain projects or a narrowly defined set of projects, the strongest Complete Streets policy *requires* the consideration of all users for all new, retrofit/reconstruction, maintenance, and ongoing projects. (A weaker policy merely *considers* these projects as *opportunities* for applying these principles.) This might mean integrating a Complete Streets approach into existing maintenance schedules and using basic repaving work to improve the overall network, rather than just waiting on large, expensive, capital projects. While the requirement to consider all users does not mean all modes will be equally accommodated in the final project, it does mean that motor vehicles are not presumed as the primary mode and it will demonstrate a foundational culture shift in the department or agency.

Whether a repaving or more expansive construction project, this work can also be disruptive to people using the street. Under the typical status quo, the needs of people outside of cars are generally not carefully considered or accounted for when the right-of-way gets ripped up or temporarily blocked. That's why this element also specifies the need

to provide safe and routine accommodations during any construction or repair work that infringes on the right of way and/or sidewalk. E.g, a city's Complete Streets policy would codify a requirement that when a sidewalk is closed for adjacent construction, the property owner/developer must provide a sidewalk that's comparable to the one being temporarily removed. In an urban area that might mean a sheltered sidewalk to protect people from nearby construction. In a less dense suburban or rural area, that might just mean an adjacent sidewalk of the same width and quality.

### Policy scoring details

In our framework for evaluating and scoring Complete Streets policies, this element is worth **10 out of 100** possible points.

#### 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.

**ELEMENT 4.**

# Allows only clear exceptions



Any exceptions must be specific, with a clear procedure that requires high-level approval and public notice prior to exceptions being granted.

## Element #4: A strong Complete Streets policy allows only clear exceptions

**Complete Streets policies are comprehensive and apply to all streets and in all phases of all projects, but there are certain circumstances where exceptions can—and should—be made. But those exceptions must be narrowly and clearly defined, as well as require public notice prior to approval by a high-level official.**

### Why is this element integral to a strong Complete Streets policy?

Complete Streets policies should be comprehensive and apply to all transportation projects in a community, but in certain circumstances, exceptions can—and should—be made. This might seem counterintuitive, especially considering that the strongest Complete Streets policies apply to all projects and all phases (element #3.) But including specific, clear, and limited exceptions actually increases the strength of your policy because it **prevents discretionary exceptions in the future, helping to ensure equitable implementation.**

By having a clear and specific list of exceptions in the policy, everyone—transportation staff, policymakers, powerful community members—is limited to that list only. This means no backroom dealings. It means that no one has the discretionary power to exclude certain projects from the applicability of the Complete Streets policy. And residents can hold agency staff and policymakers accountable for adhering to the clearly defined exceptions. In other words, the Complete Streets policy will apply except in the very specific situations listed in the policy.

**“The only way exceptions do not turn into a big black hole is by bringing a lot of sunlight to it. So exceptions are used when necessary—not just to bypass the policy. But if you don’t make it clear what you’re trying to do and involve the public in the decision then the exception can be a process by which the intent of your policy is completely undermined.”**

– Beth Osborne, Vice President of Transportation at Smart Growth America.

### What does this element look like in practical terms?

The jurisdictions with the strongest Complete Streets policies 1) clearly specify a list of exceptions (ones that don’t stray from the National Complete Streets Coalition’s approved list of exceptions,) 2) require that any proposed exceptions are made publicly available *prior to* approval, and 3) designate someone responsible for reviewing and approving exceptions.

Below is the list of the Coalition’s approved exceptions. The Coalition considers these “approved exceptions” because they have limited potential to weaken the intention of the policy. These exceptions follow the Federal Highway Administration’s [guidance on accommodating bicycle and pedestrian travel](#) and/or identified best practices frequently used in existing Complete Streets policies:

- 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.
- Cost of accommodation is excessively disproportionate to the need or probable use.
- A documented absence of current and future need.
- Emergency repairs such as a water main leak that require an immediate, rapid response; however, temporary accommodations for all modes should still be made. Depending on the severity of the repairs, opportunities to improve multimodal access should still be considered where possible.
- Transit accommodations are not required where there is no existing or planned transit service.
- Routine maintenance of the transportation network that does not change the roadway geometry or operations, such as mowing, sweeping, and spot repair.
- 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 clearly defining appropriate exceptions, the policy must outline a clear process for reviewing and approving them, providing clarity to the staff charged with implementing the policy.

- This includes making the proposed exceptions publicly available *prior* to their review and potential approval. This could mean posting proposed exceptions to a public website that allows comments or including space for discussion on proposed exceptions during public meetings.

- It also includes specifying who will be responsible for granting approved exceptions. Ideally, this individual is a part of senior management.

In the strongest policies, everyone knows what the exceptions are, how they are reviewed and approved, who is responsible for reviewing and approving them, and a clear path for the public or other agencies to offer comments—improving transparency and accountability.

### Policy scoring details

In our framework for evaluating and scoring Complete Streets policies, this element is worth a total of **8 out of 100** possible.

- **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.



**ELEMENT 5.**

# Mandates coordination



Requires private developers to comply, and interagency coordination between government departments and partner agencies.

## Element #5: A strong Complete Streets policy requires coordination between jurisdictions, agencies, and departments

**Any number of agencies—city, county, metro region, or state—may be responsible for the streets and sidewalks, often with overlapping authority. This is why the strongest Complete Streets policies clearly define who is responsible, what level of coordination is required, and even when or how outside parties must comply.**

### Why is this element integral to a strong Complete Streets policy?

While some streets have clear ownership by a single agency, it's rarely that straightforward. For example, the state manages a street that's intersected by city streets. What happens when new crosswalks are planned? Or you have a metro planning organization that doles out federal money to the city that actually owns and maintains the streets. Or a private developer who controls a portion of the sidewalk (or even a street) through a new development surrounded by other city-owned streets.

These overlapping authorities can make it difficult to create a true network of Complete Streets rather than just a patchwork. But a strong policy will clearly define and regulate coordination and cooperation to ensure a Complete Streets approach is used on every project, especially when those projects cross or implicate multiple jurisdictions or agencies. As an example, San Jose's (CA) policy says they will "work in coordination with other departments, agencies, and jurisdictions to maximize

opportunities for Complete Streets, connectivity, and cooperation."

### What does this element look like in practical terms?

There are really just two main components in the scoring for this element, depending on whether or not the policy is intensely local (city, county) or less so (state, metro), since a city has limited ability to dictate terms to their state DOT, though they can still establish their own commitment to coordination. At the local level, the focus is requiring private developers to comply with the Complete Streets policy to prevent gaps in the broader network of Complete Streets. For instance, in order for private developers to move forward with a zoning or building permit, they should also be required to address how they will incorporate Complete Streets into the project being reviewed, if applicable.

At the state and metro level, it's largely about incentives within the policy to steer a greater share of that funding to projects that account for the needs of all modes and users. States (and metro areas to a lesser degree) control the lion's share of all federal transportation funding. And so a state- or metro-level policy gets all five points if the policy makes it clear that projects that account for the needs of all modes and users will be prioritized for funding. (Often this happens by receiving extra weight in the scoring process to decide which projects are included in the state- or metro-level transportation plan. At the metro level, this is the Transportation Improvement Plan, which is a list of projects that are actually in the pipeline to receive funds and get built.)

The second component for all policies is a requirement for agencies *within* a jurisdiction to coordinate and bring their other plans into alignment with the vision for building Complete Streets, like requiring a city's zoning or housing department to coordinate with the transportation department. Every transportation problem is also a land-use issue, and vice versa, so requiring this coordination is vital for ensuring that the benefits of having safe streets for walking or biking are maximized by the land-use decisions on or near those streets.

### Policy scoring details

The best Complete Streets policies clearly define the role and responsibility of each particular agency and require, rather than just encourage, cooperation and coordination. Using the right tool at the right scale ensures that agencies and jurisdictions use their resources effectively, minimizes opportunities for variances from the policy, and creates a framework for better decision-making amongst everybody involved. Doing this well also builds trust and the kinds of relationships that are essential to building a complete network.

In our framework for evaluating and scoring Complete Streets policies, this element is worth a total of **8 out of 100** possible points.

#### For municipality/county policies:

- **5 points:** The policy requires private development projects to comply.
  - (2 points) The policy mentions or encourages private development projects to follow a Complete Streets approach.
  - (0 points) No mention.

#### For state/MPO policies:

- **5 points:** The 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 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 of all modes and users.
  - (0 points) No mention.

#### For all policies:

- **3 points:** The 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.

## ELEMENT 6.

# Adopts excellent design guidance



Directs agencies to use the latest and best design criteria and guidelines, and sets a time frame for implementing this guidance.

## Element #6: A strong Complete Streets policy adopts excellent design guidance

**What facilitates the transition from a policy into tangible street designs? To bring a Complete Streets policy to life, engineers need to know how to design these streets in very clear, concrete terms. The best Complete Streets policies will adopt excellent street design guidance that directs and supports practitioners to create an accessible and complete network of streets.**

### Why is this element integral to a strong Complete Streets policy?

Adopting excellent design guidance equips your jurisdiction's engineers with the practical information they need to design streets that reflect the vision of your Complete Streets policy. Design guidance bridges Complete Streets from **policy to pavement**.

But first, what is a design guide? Design guides are resources that help engineers determine the appropriate dimensions and characteristics of roadways. For example, they help engineers navigate questions around lane widths, speed limits, turning radii, crossing locations and markings, signal timings, traffic controls, and much more. Design guides are used in all phases of transportation projects from new construction and reconstruction to operations and maintenance. Typically, design guides are issued by national organizations and agencies like the Federal Highway Administration (FHWA), the American Association of State Highway and Transportation Officials (AASHTO), the Institute of Transportation Engineers (ITE), and the National Association of City

Transportation Officials (NACTO). State and local agencies may also choose to create their own guidance, and in those instances they often will adapt existing guidance.

But not all guides are created equally, and some jurisdictions still rely on design guides that use highway engineering principles and prioritize vehicle throughput over all other uses of the street. For example, encouraging wider lanes and fewer crossings, in order to move vehicles more efficiently, is often done at the expense of safety and mobility for anyone not in a vehicle. This kind of guidance is at odds with the Complete Streets approach.

The National Complete Streets Coalition believes that the strongest Complete Streets policies need to adopt specific, best state-of-the-practice design guidance and/or require the update of internal design policies and guides. In order to effectively design a Complete Streets street network, engineers need design guidance that includes both specific standards and explicit flexibility to accommodate all users and modes, and prioritize safety for vulnerable roadway users.

### What does this element look like in practical terms?

When it comes to design guidance, the jurisdictions with the strongest Complete Streets policy will do two things: 1) direct the adoption of specific, best state-of-the-practice design guidance and/or outline which internal design guidance it plans to revise or develop and 2) set a timeline for implementing the guidance.

**“A common barrier to implementation of Complete Streets policies are outdated design protocols with both state and local governments. Even when design engineers want to advance Complete Streets design solutions, they are often limited by design standards, guidelines, forms, and manuals that haven’t been updated to support their Complete Streets policy and align with the needs of their communities. This element rewards governments that are able to align their design doctrine with their Complete Streets policies.”**

– Mike Jelen, PE – Principal Director, WSP

There are a number of existing design guidance documents that can help your jurisdiction build out a complete network of streets. Moreover, since design procedures and protocols continue to evolve, organizations like NACTO, ITE, and AASHTO are constantly releasing new, updated editions. While some jurisdictions adopt existing design guidance outright, others use said guidance to revise or develop their own internal design guidance documents. Regardless of whether you choose to adopt something existing or develop your own, it is crucial to set a timeline for implementation. At what date are engineers required to use the newly adopted guidance? When will you plan to have a draft and final version of your internal guidance ready? When do you plan to revisit and review your guidance to ensure it is still the best state-of-the-practice?

For the most part, jurisdictions have the ability to select appropriate design guidance for their community. In the past sometimes cities

ran into issues with their state prohibiting certain design guidelines. However, thanks to [a rule change in the 2021 infrastructure law](#), for federally funded projects, localities can use safer street design guidelines approved by the FHWA (such as those from NACTO), even if their state has prohibited them from doing so.

Some examples of what the Coalition considers best, state-of-the-practice design guidance are below. *Note: This is not a comprehensive list of all the state-of-the-practice design guides, and also reflect what was available in April 2023. Refer to the online version of the policy framework for any available up-to-date information: <https://smartgrowthamerica.org/10-elements-of-complete-streets/>*

- Small Town and Rural Multimodal Networks (FHWA)
- Separated Bike Lane Planning and Design Guide (FHWA)
- Achieving Multimodal Networks: Applying Design Flexibility and Reducing Conflicts (FHWA)
- Guide for the Planning, Design, and Operation of Pedestrian Facilities (AASHTO)
- Guide for the Development of Bicycle Facilities (AASHTO)
- A Guide for Achieving Flexibility in Highway Design (AASHTO)
- Designing Walkable Urban Thoroughfares: A Context Sensitive Approach: An ITE Recommended Practice (ITE)
- Urban Street Design Guide (NACTO)
- Transit Street Design Guide (NACTO)
- Urban Bikeway Design Guide (NACTO)
- Urban Street Stormwater Design Guide (NACTO)
- Public Rights-of-Way Accessibility Guidelines (PROWAG) (United States Access Board)

## Policy scoring details

In our framework for evaluating and scoring Complete Streets policies, this element is worth a total of **7 out of 100** possible points.

- **5 points:** 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.
- **2 points:** Policy sets a specific time frame for implementation.
  - (0 points) No mention.

## ELEMENT 7.

# Requires proactive land-use planning



Considers every project's greater context, as well as the surrounding community's current and expected land-use and transportation needs.



## Element #7: A strong Complete Streets policy requires proactive and supportive land-use planning

**Streets don't exist in a vacuum. They are inextricably connected to the buildings, sidewalks, spaces, homes, businesses, and everything else around them that they serve. The strongest Complete Streets policies require the integration of land-use planning to best sync up with a community's desires for using and living on their land today and in the future.**

### Why is this element integral to a strong Complete Streets policy?

Streets are tools that we use to connect us to destinations. They provide spaces for us to gather and move around, and create a framework for creating and capturing economic value so we can build productive places with opportunity for everyone. They are a means to an end, serving the places and spaces between all the streets. This element recognizes this fundamental truth by requiring coordination with land-use planning and clearly defining how a Complete Streets effort will serve current and future land uses.

### What does this element look like in practical terms?

In the simplest terms, this element requires a jurisdiction's land-use policies (including but not limited to plans, zoning ordinances, or similar documents) to specify how these other non-transportation plans will both *support and be supported by* the community's Complete Streets vision. For example: A community has a Complete Streets policy and it

**“People don't care what the underlying transportation function of a street is. What we care about is whether we can safely and reliably use our streets to access the places we want to go, on foot, by bike or transit, or by car. This element supports integrative decision-making by matching street designs with the planned land use context and adopting a diverse mix of land uses that encourage shorter trips. This makes the places we want to go safer and easier to get to.”**

– Drusilla van Hengel – Principal, Nelson\Nygaard

comes to bear on a project to retrofit an existing street that runs through an area **zoned or earmarked in the city's comprehensive land-use plan** for greater density and a mix of uses, perhaps neighborhood-serving retail with multi-family housing like apartments or rowhomes. But those buildings haven't been built out yet or are in progress.

In this specific example, a Complete Streets policy receiving maximum points would require the transportation agency to incorporate a Complete Streets approach in future land-use plans for this area and consider the needs not just of today's users of that street, but those who will be using it in the coming years as new buildings are built next to the sidewalk and more residents and businesses come to the area. This contrasts with the approach of the old paradigm, which would just look at a street running through an area without any mix of uses, people, or activity and make decisions that ignore zoning maps and comprehensive land-use plans. There may not be an opportunity to rebuild the street for

a decade or more, so build the street to serve the place that’s envisioned in the land-use plans, rather than the place it once was.

This is the kind of tight integration between land-use and transportation that is required by the strongest Complete Streets policies. Land-use considerations should be deeply embedded into the processes and plans of the transportation planners and their departments.

Complete Streets are also reflective of the needs of the surrounding community and are designed to serve them, so strong policies always consider that context throughout the process. It’s also an unfortunate reality in most places that transforming certain streets to be less dangerous and better serve everyone in those communities can also make those areas more attractive for future development, so a forward-looking policy will specify a need to address potential unintended consequences—like the displacement of residents due to rising costs of living—while still prioritizing streets that serve everyone.

## Policy scoring details

In our framework for evaluating and scoring Complete Streets policies, this element is worth a total of **10 out of 100** possible points.

### For municipality/county policies:

- **5 points:** 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:

- **5 points:** 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:**

- **3 points:** Policy requires the consideration of the community context as a factor in decision-making.
  - (1 point) Policy mentions community context as a potential factor in decision-making.
  - (0 points) No mention.
- **2 points:** Policy specifies the need to mitigate unintended consequences such as involuntary displacement.
  - (1 point) Policy acknowledges the possibility of unintended consequences.
  - (0 points) No mention

■ ELEMENT 8.

# Measure progress



Establishes specific performance measures that match the goals of the broader vision, incorporate equity considerations, and are regularly reported to the public.

## Element #8: A strong Complete Streets policy measures progress

**How do you know if your Complete Streets policy is working?**

**You measure it. And then you share the results publicly. A strong Complete Streets policy requires tracking performance measures across a range of categories—including implementation and equity—and making someone responsible for doing it.**

### Why is this element integral to a strong Complete Streets policy?

As the old saying goes, “what gets measured, gets done.” That rings true for Complete Streets policies too—if you want to make sure your Complete Streets policy is fully realized, you need to measure your progress. Measuring performance in transportation is not new. But historically, transportation metrics have focused on motor vehicles with metrics like pavement quality and congestion. But adopting a strong Complete Streets policy represents a *different approach* to transportation which means committing to *new* performance measures that reflect the policy’s vision and motivation.

Performance measures provide a quantitative or qualitative indicator of the performance of a specific street, corridor, or of the whole transportation network. This information helps stakeholders better understand the impact of their Complete Streets policy and take corrective actions. For example, when progress is tracked:

- **Staff and committees tasked with implementing the policy are able to do their jobs better.** With more information on the current

performance of the transportation network, staff are able to make more informed decisions on project design, planning, maintenance, and operations.

- **The general public and advocates are able to hold city agencies and elected officials accountable.** When performance measures are publicized, transparency and government accountability is improved since individuals, community organizations, and advocates are equipped with information they can use to hold their government accountable to the vision and priorities set out in the Complete Streets policy.
- **Elected officials can better communicate to the public, and build broader support for Complete Streets.** By tracking progress on the Complete Streets policy, elected officials and other policymakers have information that helps them better communicate the status of transportation improvements in their community. Information on the impact of transportation investments can also help elected officials build broader support for Complete Streets.

### What does this element look like in practical terms?

The jurisdictions with the strongest Complete Streets policies take four clear, concrete steps:

1. Establish specific performance measures across a range of categories, including implementation and equity
2. Set a timeline for the recurring collection of performance measures
3. Require performance measures to be publicly shared
4. Assign responsibility for collecting and publicizing performance measures

As far as the specific measures are concerned, a community should adopt performance measures that reflect the community's priorities, and more specifically reflect the overall vision and motivations stated in the Complete Streets policy itself. For example, if your community's priority is improving health equity, one metric you might track is serious injuries by race, ethnicity, age, gender, income, disability status, and/or neighborhood. Measures should be tailored to a community's priorities but they should also cover a wide range of categories to ensure a holistic evaluation of the transportation network. Some examples of categories your community might measure are safety, access, economy, public health, and environment.

Beyond these, it's crucial to track two specific areas: policy implementation and equity. For the former, this could include tracking which internal policies and documents have been updated, how many staff members have been trained, how many exceptions have been approved, and how well the public engagement process is working. Equity is less of a specific *single measure*, and should instead be embedded within *all performance measures*; jurisdictions can do this by disaggregating the data by race, ethnicity, age, gender, income, disability status, and/or neighborhood. Measuring this information can help jurisdictions evaluate whether disparities are being exacerbated or mitigated.

Below is a list of examples that can be used:

- Number of crashes and severity of injuries
- Injuries and fatalities for all modes
- Presence of adequate lighting
- Travel time in key corridors (point A to point B) by mode

- Number of trips by walking/rolling, biking, transit, and driving
- Presence of transit facilities, biking facilities, and walking/rolling facilities
- Sidewalk condition ratings
- Number of curb ramps
- Building vacancy rates
- Access to jobs by mode
- Temporary and permanent jobs created by project
- Emergency vehicle response times
- Number of students who walk or bike to school
- Number of mode users: walk, bike, transit
- Bike route connections to off-road trails
- Number of bike share users
- Air quality
- Number of street trees
- Number of temporary and permanent art installations
- Internal policies and documents updated
- Number of staff trained
- Effectiveness of community engagement process

*Additional examples can be found in [Evaluating Complete Streets Projects: A Guide for Practitioners](#).*

Finally, and perhaps most importantly, this information is only valuable if it is made publicly available on a consistent basis. To do that means committing to a timeline of how often the data will be collected and published publicly and it means putting someone in charge of that process.

## Policy scoring details

In our framework for evaluating and scoring Complete Streets policies, this element is worth a total of **13 out of 100** possible points.

- **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.

## ELEMENT 9.

# Sets criteria for choosing projects



Creates or updates the criteria for choosing transportation projects so that Complete Streets projects are prioritized.



## Element #9: A strong Complete Streets policy sets criteria for choosing projects that prioritizes Complete Streets projects

**Every local community, region, and state has a process by which they choose which transportation projects to fund and build. A strong Complete Streets policy changes that process by adding new or updated criteria that give extra weight to projects that advance Complete Streets and improve the network.**

### Why is this element integral to a strong Complete Streets policy?

A Complete Streets policy that results in the same old road projects being built is just a paper tiger. A strong and effective Complete Streets policy starts to reshape the process by which projects are chosen for funding and advancement.

At every level of government—state, metro, and local—there is some sort of prescribed process in place for selecting transportation projects for funding and construction. The strongest policies clearly define new or updated criteria for that process to ensure that Complete Streets projects get prioritized to advance.

It's also often true that the existing, conventional process for choosing projects prioritizes the needs of people who are driving rather than all people within a community. There's a heavy focus on criteria that prioritize vehicle level of service (how many cars can be moved through a corridor), or account for potential impacts to vehicle travel time, while

ignoring the more holistic impacts of improving access to jobs and services.

### What does this element look like in practical terms?

This is often the part of the transportation planning process that is the most opaque for the public: How projects are selected.

In some places, such as with the Virginia's Smart Scale program, projects are measured quantitatively against a range of predetermined criteria and the highest-scoring projects receive funding.<sup>a</sup> This is far more transparent than Virginia's previous process. In other states or cities, this process is much more of a black box, and residents may have far less confidence that anything other than politics or influence is shaping which projects move forward. A strong Complete Streets policy both opens up this black box and institutes criteria that prioritize projects that will advance the community's goals (see element #1) within their Complete Streets policy, such as improving active transportation options, completing a network of Complete Streets, targeting underserved communities, and reducing health, safety, and economic disparities.

If the process for choosing transportation projects is unchanged by the Complete Streets policy, then that policy will fail to be fully implemented.

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<sup>a</sup> Read more about Virginia's Smart Scale program here: [https://smartscale.org/how\\_it\\_works/default.asp](https://smartscale.org/how_it_works/default.asp)

## Policy scoring details

Three clear changes are the goal for this element. First, modifying the jurisdiction's project selection criteria. Second, establishing clear and specific criteria that will prioritize Complete Streets projects and create better multimodal network connectivity for all users. And third, embedding equity considerations in those criteria by targeting underserved communities and/or alleviating disparities in health, safety, economic benefit, and access to destinations.

In our framework for evaluating and scoring Complete Streets policies, this element is worth a total of **8 out of 100** possible points.

- **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.

## ■ ELEMENT 10.

# Creates a plan for implementation



A formal commitment to the Complete Streets approach is only the beginning. It must include specific steps for implementing the policy in ways that will make a measurable impact on what gets built and where.

## Element #10: A strong Complete Streets policy requires a plan for implementation

**A formal commitment to a Complete Streets approach is just the beginning. A strong policy also spells out specific steps for implementing the policy in ways that will make a measurable impact on what gets built and where.**

### Why is this element integral to a strong Complete Streets policy?

Over the last decade, we've come to understand that a Complete Streets policy is only the first step to making streets safer and more accessible to everyone. The strongest policies often represent a massive paradigm shift from the current practices, agency processes, and standards that have been producing unsafe, incomplete, inaccessible, and unproductive streets. And so they must also include a clear plan for how an agency will go about putting the policy into practice.

We have seen policies in the past that are clear and strong in nearly every area, yet fail to produce the desired impact because there was no plan, checklist, or entity in charge of institutionalizing the policy and putting it into practice. (If everyone is responsible, then no one is responsible.) These missing components make it difficult (or impossible) to ensure professional staff is trained, stakeholders are held accountable, processes are updated, and the public is equitably engaged.

And so achieving a Complete Streets policy's ambitious goals requires this tenth and final element: A clear, measurable, accountable plan for

thorough and thoughtful implementation.<sup>a</sup>

### What does this element look like in practical terms?

To produce different outcomes when it comes to designing and building streets, departments of transportation must change the way they operate, including changes to their project development process, design guidelines, and performance measures. This is most successfully done through training, education, and strong leadership. Jurisdictions should include language and actionable steps for implementation in their Complete Streets policy. Implementation steps are worth the most points out of all of the policy elements, as they lay out specific next steps for putting the policy into practice.

Unlike the other nine elements, based on our long experience and hard-won knowledge borne of real-world experience in scores of communities, this element is a little more prescriptive. These five short steps—to be embedded in the policy itself—provide an actionable checklist for implementing a new, strong Complete Streets policy:

- **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.

<sup>a</sup> While "implementation" was included in the National Complete Streets Coalition's pre-2018 policy framework, it was revised to set the bar far higher and provide clearer guidelines, including increased accountability from jurisdictions and requirements to include equity and community engagement.

- **Develop new design policies and guides or revise existing policies to reflect the current state of best practices in transportation design.** Communities may also elect to adopt national or state-level recognized design guidance.
- **Offer workshops and other training opportunities** to transportation staff, community leaders, and the general public.
- **Create a committee to oversee implementation.** 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.
- **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.

### Policy scoring details

In our framework for evaluating and scoring Complete Streets policies, this element is worth a total of **15 out of 100** possible points.

- **3 points:** The policy requires that related procedures, plans, regulations, and other processes be revised within a specified time frame.
  - (1 point) The policy mentions revising procedures, plans, regulations, and other processes.
  - (0 points) No mention.
- **3 points:** The policy requires workshops or other training opportunities for transportation staff. The 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:** The 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. The 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.
- **6 points:** The 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. The 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.

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**The National Complete Streets Coalition**, a program of Smart Growth America, is a non-profit, non-partisan alliance of public interest organizations and transportation professionals committed to the development and implementation of Complete Streets policies and practices. A nationwide movement launched by the Coalition in 2004, Complete Streets is the integration of people and place in the planning, design, construction, operation, and maintenance of transportation networks. [www.completestreets.org](http://www.completestreets.org)

**Smart Growth America project team:** Based on language produced in in 2018, the primary authors of this revised version were Mae Hanzlik and Steve Davis. Released in April 2023.

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