

CMAQ Process Evaluation and Transformation Summary of Comments and Concerns

In an effort to move the work forward and preclude additional CMAQ PSC meetings, a summary of the concerns and comments from meetings held through June 12, 2014 to discuss the changes to the procedures used to evaluate and rank projects has been provided for your review. Staff also met with several working committees and the Regional Coordinating Committee; comments from those meetings are also summarized. As the conversation continues, the input of the PSC members is critical to develop an improved and workable process.

Please review these comments/concerns and the two documents provided at the June meeting. If you agree or disagree with a comment/concern or have a comment/concern to add, please indicate so on the document. If you would like to propose changes to the Policies Document or the Memo on the proposed ranking system, please provide a suggested change. All three documents have been provided in MS Word format. The process should be in place prior to the anticipated call for 2018 – 2020 projects in January 2015 so that sponsors have a chance to prepare their proposals.

1. Section A:2,d of the Policies should more explicitly state that staff will prepare air quality rankings and evaluate transportation impact criteria to develop a composite score for applications that would be presented to the focus groups for validation.
 - a. Drawing on their professional judgment and experience as subject matter experts, the focus groups could elevate other issues and recommend adjustments to the program.
 - b. Those adjustments would go back to staff, who would then present a recommended program to the committee for consideration for recommendation to the Transportation Committee.
2. The Policies should state that examples of other criteria that could factor into the programming recommendations are regional equity, project readiness, sponsor capacity and project mix.
3. The service boards should provide the real cost and schedule for engineering activities for staff to determine an appropriate percentage of the engineering costs of a transit capital project that should be eligible for CMAQ funding to level the playing field with highway projects that cannot receive funding for phase I engineering.
4. Staff should develop a table, in cooperation with IDOT Local Roads staff, to better define “substantially complete” for phase 1 engineering, recognizing that final IDOT review time is beyond sponsor control and that different project types require different levels of phase 1 effort. The goals of the “substantially complete” requirement are to ensure an early local commitment to a project and to establish a full scope and cost estimate prior to requesting CMAQ funding.

5. There should be a requirement that transit and bicycle facility projects be included in an adopted/approved planning document.
6. Soft match should be allowed for local match, in accordance with IDOT policies, and should be included in the Policies document.
7. Privately funded direct emissions projects that involve only the marginal cost difference being eligible for funding should have a federal match level of 80% of the marginal cost difference and not 65%.
8. Sponsors requesting phase I engineering funds based on financial hardship, should only do so with the understanding that funds for additional phases are not guaranteed and will only be considered under a future call for projects.
9. Project applications should be ranked together based upon a composite score of the emissions benefits along with other criteria, including measures related to transportation impacts and regional priorities.
10. The actual dollar per kilogram of pollutants eliminated should be documented for each project along with the Cost Effectiveness Score.
11. A single numeric score should be provided, rather than using a “yes/no” or “low/medium/high” rating.
12. The transit supportive development score should consider the permitted density, not actual density. The intent is for sponsors to have made the land use decisions prior to applying for infrastructure funding.
13. The commuter parking projects should be evaluated as transit facilities but a way to determine asset condition for facilities that do not currently exist that balances GO TO 2040's emphasis on modernizing the existing system with the desire to encourage Transit Oriented Development in the region by providing new stations is needed.
14. The recommended program by staff will provide documentation for why a low ranking project should be funded or why a high ranking project should not. It should be up to the PSC to make the final recommendation. Examples of this might include:
 - An innovative project that scores low but has characteristics which would lead to behavioral changes that cannot be captured in the point system may be recommended for funding
 - Projects with strong sub-regional multi-jurisdictional support may be recommended for funding
 - Projects with benefits reaching beyond their immediate location may be recommend for funding
 - Projects which cannot demonstrate readiness may not be recommended for funding

15. Points should be awarded for projects located on the Congestion Management Process network.
16. Points should be awarded for projects that address a safety problem, in addition to a congestion and/or air quality problem, at a location included in the IDOT "5% Report".
17. Projects should be awarded points for having a high transit accessibility index.

Meetings with working committees and the Regional Coordinating Committee in June yielded the following:

18. A member at the Regional Coordinating and Land Use Committee meetings brought up the potential for funding Phase I Engineering, particularly for municipalities, leading to discussion about the need for the CMAQ program to have well-defined projects versus the need for local governments to avoid paying for preliminary engineering.
19. At both the Land Use and Environment Committee meetings, members brought up the possibility of additional consideration being given to projects that have other environmental benefits, such as projects that include permeable pavement, bioswales, recycled materials, etc. The Environment Committee discussed evaluating the carbon reduction benefits of CMAQ projects, noting that GO TO 2040 includes greenhouse gas (GHG) emission reduction targets. Staff expects that carbon dioxide reduction will be linearly related to volatile organic compound and fine particulate matter reduction, so that while GHG reduction could be quantified and reported as a benefit of the program, it does not need to be used as an additional criterion for project selection.
20. Members of the Economic Development Committee suggested that the program should consider economic impact and equity, but did not provide suggestions about how to do so.