

Comments related to program goals and award limits and rolling focus and eligible project types

The comments below that relate to program goals and award limits and rolling focus and eligible project types were extracted from the previously published [Detailed log of comments, responses, and potential actions](#) (September 26, 2018), [Individual program comments](#) (September 5, 2019), and an October 3, 2019 [letter](#) from the DuPage Mayors and Managers Conference to the STP Project Selection Committee. These extracted comments are being re-posted to inform “lessons learned” discussion about reaffirming program goals and the consideration of enacting rolling focus for future calls for projects.

Program Goals and Award Limits
<p><u>DMMC 8/13/18:</u> The focus on regional goals, while providing some benefit, may result in geographic inequity and dilute local priorities.</p>
<p><u>CDOT 8/19/19:</u> CMAP’s call for FFY 2020-2024 STP-Shared applications states the program’s intent is to fund “important regional projects that address regional performance measures and the goals of ON TO 2050.” We agree wholeheartedly with this goal. However, we are concerned the current staff recommended program passes up high scoring regionally important projects in favor of lower scoring projects. Upon discussion with CMAP staff, CDOT has come to understand this inconsistency between the goals and recommendations is due to CMAP programming policies that were intended to promote full funding of projects at the amounts and in the years requested. While these policies may have merit, they were not written in the call for projects and were not clear to multiple applicants and members of the Project Selection Committee. Specifically, CDOT is concerned with the unwritten policy to effectively disqualify any project that requested more than \$40M in a given year and to not consider partial funding of projects.</p> <p>In the interest of maintaining an open and transparent project selection process, it is important to ensure the performance-based metrics agreed upon are followed to the maximum extent possible. This will help fulfil the primary goal of the STP-Shared program to fund important regional projects.</p>
<p><u>DMMC 10/3/19:</u> The Shared Fund should provide the funds needed to close funding gaps, and applicants should be rewarded for committing more than the locally required funding match.</p>
<p><u>MCCOM 5/21/18:</u> MCCOM requests that the PSC designate a maximum amount of STP funding awarded to the City of Chicago or a single suburban council in each shared funds call for projects. As noted in our Council’s letter dated July 19, 2017, McHenry’s repeated request of Advance Funding demonstrates that our yearly allotment has not met the needs of our area for several years. A maximum award amount per council would promote geographic equity and further ONTO205’s goal of “leveraging the transportation network to promote inclusive growth”.</p>

DMMC 8/13/18:

There should be a maximum award size; either maximum dollar amount or share of available funds.

DMMC 10/3/18:

Consider a cap on funding of large projects. Given the demand for funding across the region as demonstrated in the first call, a cap on funding of large projects would guarantee that one project does not take the entire funding in a given year and helps ensure that local agencies are financially committed to submitted projects.

Multiple commenters 7/18/19 – 8/16/19:

Partial funding of projects should not be considered for the FFY 2020 – 2024 program, however it should be discussed for future calls. Considerations mentioned included potential for delayed implementation if full funding isn't secured, conflict with the goal of filling funding gaps, and potential for increased local contributions if partial funding is available.

Rolling Focus and Eligible Project Types

NWMC 8/3/18:

We believe that the Project Selection Committee should remain open to modifying the “rolling focus” of subsequent calls based on the regional demand for certain project types in previous calls.

DMMC 8/13/18:

Proposed rolling focus should not be enacted until a study of the effectiveness of the first round of funding is completed.

NW Council Transportation Committee 8/16/18:

Limiting STP, a program with broad federal eligibility, to eight project types seems like enough focus, without the need for a further rolling focus. If additional focus is needed, the results of the first call for projects should be used to inform that focus.

NW Council 8/21/18:

It is premature to formalize the focus of the second through fourth calls for projects. Focusing on a specific subset of projects in these calls prevents municipalities from responding to specific transportation needs at a given point in time. The project selection process should allow for a broad, multi-faceted program rather than limiting its focus.

NWMC 8/31/18:

The current proposal for the rolling focus of calls for projects in 2021, 2023, and 2025 should be abandoned in favor of an open call in each year within the eight eligible project areas. Solidifying the focus for each call for projects now unnecessarily restricts flexibility and may set false expectations if the focus ends up changing in later years. Additionally, the decision to include only eight eligible project types will already lead to a narrowly focused group of applications. Eliminating the rolling focus will provide the region with the necessary flexibility to respond to transportation needs while also providing sponsoring communities with adequate time to prepare their projects for each call. At the very least, we advise against setting the 2021 (and perhaps subsequent) focus areas based on the initial call for projects,

since it may be difficult for project sponsors to create a substantial list of projects that meets the readiness requirements for applying to the shared fund (i.e. having phase I engineering completed without knowing the focus well in advance).

DMMC email 9/5/18:

Line 55: The proposed rolling focus is unchanged. CMAP added purported justification for the rolling focus – limited funds in future cycles.

Lake Council 9/12/18:

The LCCOM supports the staff proposal regarding the rolling focus that was discussed at the August 22nd STP Project Selection Committee. Specifically, the LCCOM supports that the initial call for projects will be open to all project types listed in the draft STP (FFY2020-2024) Program Application Booklet and that the proposed rolling focus is re-evaluated after the initial call for projects. The LCCOM requests that any proposed changes narrowing the focus areas to be a subset of all initial project types be released for public comment alongside the draft program for the STP Shared Fund in the summer of 2019.

DMMC 10/3/19:

DMMC is opposed to “rotating categories” for future Shared Fund cycles. This most recent Call for Projects saw seven of the eight eligible categories receive applications for funding, demonstrating the need for funding a variety of project types at each Call. Allowing applications in all categories gives project sponsors the flexibility to consider various projects and does not force an arbitrary timeframe on needed projects.

DMMC Trans Tech/Trans Pol 7/26/18:

Should interstate/tollway “accessibility” be a project type (i.e. new/improved interchanges)?

Active Transportation Alliance 8/10/18:

The road expansion category should be eliminated.

DMMC 8/13/18:

All federally permitted project eligibilities should be included in the first call for projects.

Active Transportation Alliance 8/16/19:

Work with stakeholders across the region to assess ways to better use STP and other funding sources to fund projects that enhance the frequency of transit service, speed, and reliability, and thereby increase transit ridership.

Active Transportation Alliance 8/16/19:

Add walking and bicycling projects as an eligible project type for the STP Shared Fund.

Metropolitan Planning Council 8/16/19:

Given the extensive and urgent needs for better quality and safer bicycle and pedestrian infrastructure in the region, we find the exclusion of bicycle and pedestrian projects as eligible projects to be a major issue. There is no shortage of significant bicycle and pedestrian needs in this region to connect significant network gaps, including projects that exceed the \$5 million project cost threshold.