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May 21, 2018

ALGONQUIN
BARRINGTON
HILLS

Jessie Elam
Policy & Programming
Chicago Metropolitan Agency for Planning
233 South Wacker Drive, Suite 800
Chicago, IL 60606

BULL VALLEY

RE: STP Shared Fund - Draft Proposal

CARY

Dear Mr. Elam,

CRYSTAL LAKE

FOX RIVER GROVE

The McHenry County Council of Mayors (MCCOM) met on May 3, 2018 to discuss CMAP's draft STP Shared Fund proposal presented to the STP Project Selection Committee (PSC) on May 2, 2018. MCCOM appreciates the time and effort that went into crafting this proposal and respectfully submits the following suggestions.

GREENWOOD

HARVARD

HEBRON

HOLIDAY HILLS

Phase 1 Engineering Funding Eligibility

HUNTLEY

MCCOM requests that the PSC adjust the eligibility for phase I engineering from a needs-based threshold to a sliding scale. The current structure only allows hardship communities that meet the threshold to receive funding for phase 1 engineering while those communities that fall just above the threshold would not be eligible. The Council believes that a sliding scale would be more equitable for communities that do not meet the eligibility but come close. This could be done similar to the LTA program in which the local match for phase I engineering would be higher for low need communities and lower for high need communities.

JOHNSBURG

LAKE IN THE HILLS

LAKEMOOR

LAKESWOOD

MARENGO

McCULLOM LAKE

Funding Distribution

McHENRY

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 fund 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 ONTO2050's goal of "leveraging the transportation network to promote inclusive growth".

OAKWOOD HILLS

PORT BARRINGTON

PRAIRIE GROVE

RICHMOND

RINGWOOD

Transportation Impact

SPRING GROVE

TROUT VALLEY

MCCOM requests that the PSC reduce or eliminate the population/job benefit score, which unfairly disadvantages areas of the region with low population and employment densities. The McHenry Council believes that good projects can be found in all corners of the region and taking into account population and employment will have the effect of cutting off exurban Councils from the

UNION

WONDER LAKE

WOODSTOCK

McHENRY COUNTY

regional fund. Reducing or eliminating this scoring criteria would promote geographic equity and allow for projects that will have a significant transportation impact in smaller councils to compete.

If you have any questions, I would be happy to discuss them with you.

Sincerely,

A handwritten signature in black ink that reads "Rick Mack". The signature is written in a cursive, flowing style.

Rick Mack, Chairman

McHenry County Council of Mayors

cc: Dan Burke, Chicago Department of Transportation
Luann Hamilton, Chicago Department of Transportation
Kevin O'Malley, Chicago Department of Transportation
Leon Rockingham, Council of Mayors
Jeffrey Schielke, Council of Mayors
Eugene Williams, Council of Mayors



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Warrenville
Wayne
West Chicago
Westmont
Wheaton
Willowbrook
Winfield
Wood Dale
Woodridge

July 17, 2018

Joseph Szabo, Executive Director
Chicago Metropolitan Agency for Planning
233 S. Wacker, Suite 800
Chicago, IL 60606

Dear Mr. Szabo,

The Surface Transportation Program (STP) is one of the most critical funding sources for local and regionally-significant transportation projects. We appreciate the willingness to have CMAP staff attend the July 26 joint meeting of our Transportation Policy and Transportation Technical Committees to help explain the proposed changes to the STP process. As revisions to the STP allocation methodology and processes approach finalization, the DMMC Board of Directors requested this letter be sent for two purposes:

First, the DuPage Mayors and Managers Conference continues to have concerns with the overall process being proposed, as first documented in our May 19, 2017 letter to the CMAP Council of Mayors. Specifically, we are concerned that:

- The new system will provide funding based on an assessment of “need” and “performance measures” without ensuring that the projects funded will in fact address those needs. Without explicit cost-effectiveness scoring of projects in the Shared Local Fund, this concern remains. Additionally, we have thus far seen no determination of how local programs will be evaluated in the future as the performance measures are reassessed. As we asked last year, would this be based on all projects in a multi-year program, only those let, or only those completed?
- The focus on regional goals, while providing some benefit, will dilute the ability of local councils to provide funding to local priorities, and resulting in an overall degradation of funding for improvements and maintenance of the overall transportation system that residents and businesses depend on for their day-to-day mobility needs.

Second, to best prepare our members for the upcoming changes to STP, the DuPage Mayors and Managers Conference requests that CMAP provide clarity on the following questions:

Shared Local Fund

1. What is the rationale for excluding regional trail gap completion projects and bicycle/pedestrian grade separations that meet the minimum multi-jurisdictional coordination or minimum project cost criteria from eligibility for the Shared Local Fund?

2. Can you confirm that the proposed “highway/rail grade crossing improvements” category includes the construction of new highway/rail grade separations where none existed before?
3. Can you elaborate the rationale for limiting project types through the proposed “rolling focus” after the first call for projects, and how the reasons for limiting the project types balance against the challenge of inserting up to six-year gaps between the eligibility windows for certain project types?
4. When during the process would the local councils notify CMAP of the allocation of the bonus points? Will you allow for this allocation of points to be completed after the initial staff determination of scoring for the other evaluation components?
5. We understand that eligibility for Phase I engineering funding will be limited to “high need” communities using the same criteria as the LTA Program. The LTA Program uses a scaled point system. What score will be needed for eligibility for Phase I engineering funding?
6. Does the proposed methodology address geographic equity in any direct way? Is there an intent to monitor and/or manage this issue?
7. Cost effectiveness is embedded in individual scoring criteria. However, there does not appear to be an overall evaluation of cost-effectiveness? Will the total cost and cost-effectiveness of a project be considered in project ranking or selection, and if so, how?
8. Will there be a maximum size award of federal funding for an individual project?
9. Will there be a limit to how many applications an individual applicant can submit?
10. Will there be a limit to how many applications can come from a single local council or CDOT?
11. Will there be a limit to how many projects an individual applicant can have funded in any one cycle?
12. Will there be a limit on how many projects can be funded in any particular local council or CDOT in any one cycle?
13. Can you specify what plans will be considered for the points in the “inclusion in plans” metric in Project Readiness category and in the Planning Factors category?
14. What level of specificity is required in the local plans in the “inclusion in plans” metric for Complete Streets, green sustainability and transit supportive land use?
15. There are multiple external data sets referenced for scoring criteria (e.g. Transit Economic Requirements Model). There are also internal CMAP data sets (e.g. that used for determining “high need”). Can you provide us, and applicants access to those data sets before applications are due?
16. In the Population/Job Benefit metric, how will the geographic boundaries of the relevant “travel shed” be determined? If a specific dataset is being used for this criterion, can you identify it?
17. For the “inclusive growth” metric, how will the boundaries of the relevant geography be determined? What is the dataset used for this determination?
18. What is the rationale for not allowing “green infrastructure” points for all project categories.

19. It appears possible that the allocation of local council/CDOT “bonus points” could be sufficient to allow an otherwise low-scoring project to receiving funding. Will there be any restrictions on such an outcome?

Active Program Management

1. We understand that Councils will be allowed to reprogram (replace a project with a different project/phase) for extended project phases. The proposed rules state that the “replacement project phase must meet deadlines of project phase it replaced.” If a replacement project is obligated in the same year as the replaced project, is that sufficient, or are there additional deadlines for unfunded phases of the replacement project?
2. In the redistribution of unobligated funding rules, it is unclear to us how projects will be prioritized for access to the Shared Fund for project cost increases. Can you clarify who will make these determinations, using what criteria, and when?
3. Can you confirm that local councils will be allowed to “grandfather” into our program any unobligated projects in our programs as of a certain date and specify what is that date?
4. What is the anticipated start date for the new Active Program Management rules, given that the Shared Local Fund will have a call for projects in 2019 for programming in 2020 and the local councils will issue their first call under the new methodology in 2020 for programming in 2021?

Thank you for considering these questions. We look forward to a continued partnership with CMAP to implement the changes to the Surface Transportation Program.

Sincerely,



Annunziato Pulice, DMMC President
Mayor, City of Wood Dale

cc: Teri Dixon, CMAP
Kama Dobbs, CMAP
Jesse Elam, CMAP
CMAP STP Project Selection Committee
CMAP Council of Mayors
DMMC Transportation Policy and Transportation Technical Committee members

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August 3, 2018

Mr. Joe Szabo
Executive Director
Chicago Metropolitan Agency for Planning
233 S. Wacker Drive Suite 800
Chicago, IL 60606

Dear Mr. Szabo,

On behalf of the Northwest Municipal Conference (NWMC), please accept the following comments on the Active Program Management and Shared Fund development by the Surface Transportation Programming (STP) Project Selection Committee. The Conference has been a strong advocate for changes and clarifications in the revised STP process. We are pleased to see recommendations from the Conference and the Council of Mayors as a whole incorporated into the draft proposals and believe that additional changes and clarifications are still needed to ensure the new process is truly viable for all communities.

Below are specific issues and concerns that we believe still need to be addressed. We look forward to further discussion and the development of a process beneficial to the region.

Shared Fund:

1. Before applying to the Shared Fund, non-municipal agencies should, at the very least, have their projects reviewed and endorsed by the benefitting councils. They would be judged against other council projects for potential bonus points. This option is similar to how the Northwest and North Shore Councils currently require outside agencies to have a municipal sponsor and is the preferred option of the councils.
2. We need clarification on the types of plans which can be used to receive points under the "Inclusion in Local/Agency Plans" category. Would a municipal Comprehensive Plan, Capital Improvement Plan, etc. qualify as an acceptable plan?
3. The Conference supports the move to include Complete Streets policies at equal weight to Complete Streets Ordinances.
4. While we understand the importance of inclusive growth in the region's comprehensive plan, the higher point value on inclusive growth for all project types risks undervaluing vital transportation projects from all parts of the region.
5. We require additional specifics on all of the planning factors, especially green infrastructure and transit supportive land use, to best prepare our members to develop their policies and potential projects.

6. Similarly, the councils and municipalities require as much information as possible on the outside evaluation data (i.e. safety improvement score, cost effectiveness calculations) before the allocation cycle.
7. We need clarification on whether there are limits on the number of applications an individual municipality or council can submit each cycle.
8. We believe that the Project Selection Committee should remain open to modifying the "rolling focus" of subsequent calls for projects based on regional demand for certain project types in previous calls.
9. We request clarification on the use of Toll Development Credits (TDC) and their impact on the region's STP funds. Will the use of TDCs reduce the amount of STP funds that some or all Councils will receive?
10. Finally, echoing concerns we first raised in 2017 as the regional STP agreement was being developed, we encourage a regular review of the projects selected by the Project Selection Committee to ensure that the past projects chosen meet the goals of the memorandum's signatories and the regional comprehensive plan.

Active Program Management:

1. Under the current proposal, unspent funds from a previous fiscal year could be used in the first six months (before March 31) of the next fiscal year. Given the inherent uncertainty of the agreement approval and project review schedule, even when a municipality has done its due diligence to move a project forward, we strongly urged the adoption of a longer period (9-12 months) to reprogram the funds.
2. We are also concerned with the ability to manage the contingency list of projects (currently our MYB list), specifically the difficulty in keeping a list of ready-to-go projects that are not guaranteed to receive funding. This aspect could make it difficult, if not impossible, to fully utilize the available funding allotted to each council.
3. We request clarification on whether the Active Program Management rules apply to council projects after the rules are adopted in 2019 or after the first call under the new council methodologies in 2020.

Thank you for your consideration of these questions and recommendations and look forward to your response. Please do not hesitate to contact Conference staff if you have any questions.

Sincerely,



Arlene Juracek
President, Northwest Municipal Conference
Mayor, Village of Mount Prospect

Cc: CMAP STP Project Selection Committee



ACTIVE TRANSPORTATION
ALLIANCE

August 10, 2018

TO: Elizabeth Irvin, Chicago Metropolitan Agency for Planning (CMAP)

FROM: Ron Burke, Active Transportation Alliance

RE: Feedback on STP Shared Local Fund

Thank you for the opportunity to provide feedback on CMAP's proposed program structure and project eligibility for the shared local fund. It's exciting to see the agency, local councils of government, and municipalities working together to invest federal surface transportation program (STP) more efficiently and effectively.

The new fund and related scoring criteria have the potential further advance the regional goals outlined in ON TO 2050 and our mission at the Active Transportation Alliance to promote walking, biking and public transit to create healthy, sustainable and equitable communities.

Please let me know if you have any questions on the following feedback or would like to discuss further.

OVERALL FEEDBACK

- **Shared Fund vs. Council Allotments:** The Chicago region remains one of the few in the country where 100% of STP funds are not programmed by the MPO with agreed upon scoring criteria from local municipalities and councils of government. Setting aside a portion of regional funding for a shared fund with scoring criteria is a significant improvement, but there is still potential that investments made with the council allotments will be inefficient and not consistent with the goals in the regional plan.

Recommendation: Staff should recommend that future STP agreements require that 100% of regional funds are programmed by the MPO with agreed upon scoring criteria.

- **Equity:** Including inclusive growth as part of the shared program scoring criteria is step in the right direction but it doesn't guarantee that STP funds are prioritized for the highest need communities. Points from other categories could potentially overwhelm any points awarded for inclusive growth, resulting in mostly projects in higher resource communities getting funded.

Recommendation: Staff should recommend that a portion of STP shared funds be set aside for communities that meet CMAP's definition of high-need communities for the LTA program.

SCORING CRITERIA FEEDBACK

- **Match Requirement:** The size of the local match requirement should be determined using CMAP's formula to identify high-need communities for the LTA program, ranging from 0-20% depending on the need.



ACTIVE TRANSPORTATION
ALLIANCE

- **Financial Commitment:** Awarding points to applications that include other funding sources is problematic because it makes it harder for low-income, high-need communities to apply. This scoring category should be eliminated.
- **Transportation Impact and Complete Streets:** All the factors used to evaluate the transportation impact of road projects (current condition/need, population/job benefit, improvement) should be multimodal, rather than having a Complete Streets set aside in the scoring criteria. If this change isn't made, at a minimum more points should be awarded for Complete Streets given the proven safety benefits for all users.
- **Roadway Expansion:** The road expansion category should be eliminated because of the reality of induced demand and the negative quality of life impacts of expanding roads. The long-term outcomes of road expansion projects run counter to the goals of the fund and the regional plan.



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August 13, 2018

Joseph Szabo, Executive Director
Chicago Metropolitan Agency for Planning
233 S. Wacker, Suite 800
Chicago, IL 60606

Dear Mr. Szabo,

On behalf of DuPage Mayors and Manager Conference (DMMC), I submit these comments on the proposed changes to the Surface Transportation Program (STP). DMMC continues to have concerns with the overall proposed process. Specifically, we are concerned that:

- The new system will provide funding based on an assessment of “need” and “performance measures” without ensuring that the projects funded will in fact address the most pressing needs of our local communities.
- The focus on regional goals, while providing some benefit, may result in geographic inequity and dilute local priorities.

Considering these concerns, DMMC recommends that the proposed changes not be enacted until the following changes are implemented for the Local Shared Fund.

- There should be a maximum award size for individual projects. This can be established either as a maximum total amount of federal funds or as a maximum share of the total federal funds available.
- The proposed rolling focus for the program should not be enacted. Instead, a study of the effectiveness of the first round of funding should be completed before any decisions are made on the focus of future rounds.
- Projects should be eligible for funding for any categories allowed in the STP federal regulations in the first round. Applicants will benefit from this maximum flexibility and ability to combine funding from STP, CMAP, TAP and other sources.
- The current criteria for what types of local plans qualify in the Project Readiness and Planning Factors categories is unclear. We recommend that the local councils should be the final arbiter of whether a local plan qualifies. This ensures that local and regional priorities are given due consideration.
- For the “inclusive growth” metric, the applicant should be allowed to establish the boundaries of the relevant geography. Applicants are best aware of the local needs and can best customize the projects to those needs.

DMMC currently manages a peer-respected system for allocating local funding through STP. We are committed to effective program management and will work with CMAP to implement the proposed new Active Program Management rules. With that said, we request these changes to the proposed rules:

1. We understand that Councils will be allowed to reprogram (replace a project with a different project/phase) for extended project phases. The proposed rules state that the “replacement project phase must meet deadlines of project phase it replaced.” If a replacement project is obligated in the same year as the replaced project that should be sufficient for this rule.
2. Local councils should be allowed to “grandfather” into our program any unobligated projects in our programs as of December 31, 2018 using then current rules. The new Active Program Management rules should go into effect only for projects that receive funding from any call for proposals after December 31, 2018.

Thank you for considering these comments. We look forward to a continued partnership with CMAP to implement the changes to the Surface Transportation Program.

Sincerely,



Nunzio Pulice, DMMC President
Mayor, City of Wood Dale

cc: Kama Dobbs, CMAP
Jesse Elam, CMAP
CMAP STP Project Selection Committee
CMAP Council of Mayors Executive Committee
DMMC Transportation Policy and Transportation Technical Committee members