

NORTHWEST MUNICIPAL CONFERENCE

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*A Regional Association of Illinois
Municipalities and Townships
Representing a Population of Over One Million*

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August 21, 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 Council of Mayors Technical Committee, please accept the following comments on the Active Program Management and Shared Fund development by the Surface Transportation Programming (STP) Project Selection Committee. We appreciate the presentation by Kama Dobbs at our August 16th meeting and her willingness to engage in a constructive discussion of our concerns.

However, a number of additional changes and clarifications are still necessary to create an effective and viable process. Below are specific issues and concerns that, in addition to those raised in the August 3, 2018 letter from the Northwest Municipal Conference, we believe still need to be addressed.

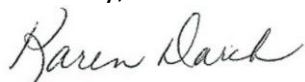
Shared Fund:

1. While we understand the goal to provide "high need" communities with funding for Phase I engineering, we believe there should be a factor in the scoring that measures the ability of a potential sponsor to deliver the project to completion before awarding bonus points.
2. 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.
3. It is possible that large projects, such as a grade separation, may be considered across multiple categories, but not score well enough in any one category to qualify for funding. Consideration should be given to large projects that satisfy multiple categories.
4. It is often difficult to confirm individual funding commitments during the early phases of larger projects. The proposed scoring for existing financial commitments may penalize some projects for not having funding sources officially obligated, which in many cases is an unrealistic expectation.
5. We believe that, rather than offering 5 points for Phase II engineering that is 85-90% complete, there should be a scale that allows projects to gain partial points based on either the cost of Phase II engineering or the percentage of

- engineering that has been completed prior to the application for funding.
6. We request confirmation that any local planning document will secure points under the “inclusion in plans” scoring criteria. Are there any limitations to the types of plans that would be allowed for consideration?
 7. We request clarification as to how the scoring criteria for inclusive growth was developed. Were the criteria created by CMAP, or is it based off the approach of another region?
 8. Up to 10 points are given to projects that serve those who are “nonwhite and under the poverty line.” Could you provide the rationale for specifying “nonwhite”? Would the map look significantly different if it only considered the percentage of the population under the poverty line?
 9. We request more information on how “facility users” are determined for the inclusive growth evaluation. The inclusive growth criteria appear to disregard whether the area being served by a particular project provides access to jobs or transit that may benefit low-income individuals, even if that area does not have a high proportion of low-income residents.
 10. We request clarification as to why the inclusive growth and complete streets planning factors apply to all project types. Why, for example, are complete streets considered when evaluating transit station rehabilitation or reconstruction projects? Similarly, why is inclusive growth a factor in evaluating rail-highway grade crossings?
 11. There is a lack of clarity as to how green infrastructure components will be scored. We request more concise criteria to be released prior to adoption.
 12. It is unclear how density, parking, and zoning directly impact bus speed and reliability improvements. Can CMAP clarify the intent of this factor?
 13. Will school buses be included when bus counts are included in a project evaluation? If not, why not?
 14. We are concerned that permitted density is weighted too heavily in the transit-supportive land use project category, as density is not the only factor that impacts transit usage. There should be some credit applied for transit that serves major destinations.

Thank you for your consideration of these questions and recommendations. We look forward to further discussion and the development of a process beneficial to the region. Please do not hesitate to contact Conference staff if you have any questions.

Sincerely,



Karen Darch
Chair, Northwest Council of Mayors Technical Committee
President, Village of Barrington

Cc: CMAP STP Project Selection Committee
Northwest Council of Mayors Technical Committee