

Summary of Comments: STP Shared Fund and Active Program Management, September 19, 2018

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Comment or Question	Staff Response
Shared Fund: Eligible Applicants	
<p><u>South TAG 7/10/18; WCMC Joint Transportation Committee 8/20/18:</u> Are non-municipal sponsors eligible to apply without partners for projects over \$5 million?</p>	<p>The staff recommendation is silent on sponsors, implying that any entity eligible by federal law could apply with a project over the \$5 million threshold.</p>
<p><u>DMMC email 9/5/18:</u> Line 19: State agencies are listed as eligible applicants without any mention of requirement they partner with local agencies.</p>	<p>The STP PSC in August implied that non-municipal sponsors, such as transit service boards, should be encouraged to seek partnerships/support from affected local jurisdictions before submitting applications.</p> <p><i>Potential action: Add language to the application booklet, lines 20-22: "Sponsors include but are not limited to municipalities, counties, townships, park districts, forest preserve districts, and transit agencies. <u>Non-municipal sponsors are strongly encouraged to seek partnerships with, or letters of support from, affected municipalities. Partners must demonstrate..."</u></i></p>
<p><u>NWMC 8/3/18:</u> 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.</p>	<p>CMAP is committed to providing equal opportunity for all federally eligible project sponsors to access regional funds.</p> <p>Councils and CDOT will have an opportunity to review all submitted applications for the purpose of assigning bonus points. During this time, it may be appropriate for councils to also indicate lack of support for applications falling wholly or partially within a council's or CDOT's boundaries. However, no entity should be permitted to block any other federally eligible applicant's reasonable access to these funds.</p>
<p><u>NWMC 8/31/18:</u> Will projects be reviewed and endorsed by the benefiting council before a non-municipal agency applies for the shared fund?</p>	<p><i>Potential action: Add language to the application booklet, line 315. "...evaluation results. <u>Councils and CDOT may also indicate at this time lack of support for non-municipally sponsored project applications falling wholly or partially within the council/CDOT boundaries. Lack of support will not cause a project</u></i></p>

Comment or Question	Staff Response
<p><u>Lake Council 9/12/18:</u> The current proposal for eligible applicants to the STP Shared Fund includes any state agency or unit of government having the authority to levy taxes. The LCCOM suggests that applicants to the STP Shared Fund are limited to the government agencies that are members of a Councils of Mayors or that the applicants have support from a Council of Mayors.</p>	<p><u>application to be disregarded, however the lack of support will be communicated to the STP PSC for consideration."</u></p>
<p><u>Shared Fund: Eligibility (Minimum Project Cost or Required Partners)</u></p>	
<p><u>Lake Council Transportation Committee 7/26/18:</u> There is a general concern that the collar counties won't be able to successfully compete with Cook County and the City of Chicago due to the cost or multi-jurisdictional requirement. A suggestion was also made for a third eligibility criteria to target projects from low-population communities.</p>	<p>The purpose of the shared fund is to support important regional projects. These are generally larger or multijurisdictional. Smaller projects can still seek funding from the local programs, which may have more funding available for such projects because larger projects are expected to gravitate to the shared fund.</p> <p><i>Potential action: None proposed at this time.</i></p>
<p><u>LCML 8/16/18 (submitted with ON TO 2050 comments):</u> If this program is enacted, many communities in Lake County will not be eligible to receive funding because they will not meet the criteria set forth within the Shared Fund Program.</p> <p>The \$5 million project minimum will prevent smaller communities from accessing this funding, since many projects in smaller communities are in the \$1 million to \$2 million range.</p> <p>Additionally, many projects in smaller communities may still be regionally significant but may not be multijurisdictional, again disqualifying our communities from receiving funding</p>	

Comment or Question	Staff Response
<p>under CMAP’s proposed Shared Fund program.</p> <p>LCML is extremely concerned that CMAP’s proposed Shared Fund Program will put our communities at a great disadvantage, resulting in lost funding.</p> <p><u>Bannockburn (through Lake Council)</u> <u>9/12/18:</u> The Village expressed concern with a \$5 million minimum project cost for STP Shared Fund and that the \$5M minimum amount will prevent smaller communities from accessing this funding. Many projects in smaller communities are in the \$1M to \$2M range. Many projects in smaller communities may still be regionally significant but may not be multi-jurisdictional.</p> <p>Village staff stated that it seems that a lot of the communities in Lake County won’t meet the criteria for the Shared Fund and are very much at a disadvantage in general and that this is very concerning.</p> <p>The Village is concerned that their community will not qualify to receive Shared Funds and feels that this puts small communities at a disadvantage due to CMAP’s criteria and regional influence of the project.</p> <p>The Village understands it is hard to have one set of criteria that fits all.</p> <p>The Village suggests having a 3rd category for project eligibility in the Shared Fund - \$5M, multi-jurisdictional, and contingency applications/projects if there are not enough projects to meet the \$5M minimum or multi-jurisdictional criteria.</p>	

Comment or Question	Staff Response
<p>The Village appreciates CMAP listening to all the communities' concerns.</p> <p><u>Hawthorn Woods (through Lake Council) 9/12/18:</u></p> <p>The Village expressed concern with the \$5 million minimum project cost for STP Shared Fund and that this \$5M minimum amount will prevent smaller communities from accessing this funding. The Village's concern is that this proposal of \$5M minimum project cost has "boxed out" many of the communities in Lake County from accessing the Shared Fund or making the required 20% cost share. The Village suggests reducing the project minimum.</p> <p>The Village suggested an under 10,000 population or small community category for project eligibility. Currently the criteria are giving points for high density/transit population growth-communities and giving points for more people, and small communities can't meet those criteria. In many grants that Hawthorn Woods applies for there is an under 10,000 population category. There are many communities in the 6 collar counties that fall into the under 10,000 population category and the Village suggests that maybe they could get some points for being a small community going after a big project that absorbs regional traffic flow. Making population categories for the Shared Fund may be a solution.</p>	
<p><u>DMMC Trans Tech/Trans Pol combined meeting 7/26/18:</u></p> <p>Could the council work together to build a "bridge rehab program" to meet the cost eligibility by presenting a package of lower-scale rehab (vs. reconstruct)</p>	<p>Comprehensive programs that involve regional/sub-regional collaboration and coordination to meet the federal performance targets are definitely a desired outcome of this program.</p> <p><i>Potential action: None proposed at this time.</i></p>

Comment or Question	Staff Response
<p>projects that, when all completed, would meet the spirit of regional significance.</p>	
<p>Shared Fund: Eligible Project Types</p>	
<p><u>DMMC 7/17/18 and 7/26/18:</u> 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?</p>	<p>TAP-L is a fund source dedicated to regional trail gap projects, but if these emerge as an unmet need in the region they could be reevaluated for future Shared Fund calls.</p> <p><i>Potential action: None proposed at this time. Revisit need in future calls, based on TAP-L 2019 CFP submittals.</i></p>
<p><u>Lake Council Transportation Committee 7/26/18:</u> What is the rationale for excluding bicycle/pedestrian grade separation projects?</p>	
<p><u>DMMC email 9/5/18:</u> Lines 39-41: The draft document does not state clearly if pedestrian bridge rail crossings are eligible.</p>	
<p><u>DMMC 7/17/18:</u> 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?</p>	<p>Changing an at-grade crossing to a grade-separated crossing is included. Adding a new crossing (at grade or grade separated) where there is currently no existing crossing would most likely be part of a roadway expansion (new/extended road) project, unless the new crossing were in place of an existing crossing(s) that would be removed as part of the project.</p> <p><i>Potential action: None proposed at this time.</i></p>
<p><u>McHenry Council 7/19/18:</u> Track improvements should be an eligible category.</p>	<p>In general, the shared fund is designed to be focused on a relatively small number of high priority project types. Adding additional project types will strain staff’s ability to evaluate and compare projects. Also, other fund sources can be used for this project type, including CMAQ (if the track improvement translates into replacing or diverting auto trips), FTA formula funds, etc.</p> <p><i>Potential action: None proposed at this time.</i></p>

Comment or Question	Staff Response
<p><u>DMMC Trans Tech/Trans Pol 7/26/18:</u> Should interstate/tollway “accessibility” be a project type (i.e. new/improved interchanges)?</p>	<p>These projects would fall into the roadway expansion category.</p> <p><i>Potential action: None proposed at this time.</i></p>
<p><u>Active Transportation Alliance 8/10/18:</u> The road expansion category should be eliminated.</p>	<p>The parties to the funding agreement are in support of this project category.</p> <p><i>Potential action: None proposed at this time.</i></p>
<p><u>DMMC 8/13/18:</u> All federally permitted project eligibilities should be included in the first call for projects.</p>	<p>Like the focus traditionally contained in local programs, the proposed focus allows the region to direct resources to priorities that are not easily funded through other sources. Also, adding additional project types will strain staff’s ability to evaluate projects and the PSC’s ability to compare them.</p> <p><i>Potential action: None proposed at this time.</i></p>
<p>Shared Fund: Proposed Rolling Focus for future calls</p>	
<p><u>DMMC 7/17/18:</u> 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 up to six-year gaps between eligibility windows for certain project types?</p>	<p>As noted in the Rolling Focus table in presentations and the draft application booklet, the focus areas for future calls will remain “draft” until an analysis and regional discussion of the first call is completed. In order to honor commitments to sponsors that move forward with early phases of projects targeting the draft focus areas for the 2021 CFP, if rolling focus is pursued, at a minimum, the identified draft focus areas will remain eligible for that CFP.</p>
<p><u>NWMC 8/3/18:</u> 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.</p>	<p><i>Potential Action: Insert additional language in the application booklet, line 59 – 61: “Given the limited funding available in future calls and wide range of eligible project types, future calls will <u>may</u> focus on a subset of project types (see the table below.) <u>The STP PSC, in consultation with the councils and CDOT, will conduct an evaluation of the range and type of applications received during the 2019 call for projects, no later than December 31, 2019, to determine if rolling focus will be pursued during future calls.</u>”</i></p>
<p><u>DMMC 8/13/18:</u> Proposed rolling focus should not be enacted until a study of the effectiveness of the first round of funding is completed.</p>	
<p><u>NW Council Transportation Committee 8/16/18:</u> Limiting STP, a program with broad federal eligibility, to eight project types</p>	

Comment or Question	Staff Response
<p>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.</p>	
<p><u>NW Council 8/21/18:</u> 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.</p>	
<p><u>NWMC 8/31/18:</u> 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).</p>	

Comment or Question	Staff Response
<p><u>DMMC email 9/5/18:</u> Line 55: The proposed rolling focus is unchanged. CMAP added purported justification for the rolling focus – limited funds in future cycles.</p>	
<p><u>Lake Council 9/12/18:</u> 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.</p>	
<u>Shared Fund: Phase 1 Engineering Eligibility</u>	
<p><u>MCCOM 5/21/18:</u> 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</p>	<p>Eligibility for funding is “all or nothing;” it is not possible to use a sliding scale for eligibility. If the comment is recommending that all sponsors should be eligible, but that match should be on a sliding scale, note that the minimum non-federal contribution to each project phase is 20%. The issue of Phase 1 eligibility and the potential use of TDCs in lieu of local match for disadvantaged communities are independent issues.</p> <p><i>Potential action: None proposed at this time.</i></p>

Comment or Question	Staff Response
<p><u>DMMC 7/17/18:</u> 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 1 funding?</p>	<p>Like CMAQ and TAP-L, municipalities whose combined median income, tax base per capita, total tax base, and population place them in the “very high need” category would be considered eligible.</p> <p><i>Potential action: Include link to data used to determine eligibility. Consider a policy to revisit the data on the same five-year recalibration cycle as the distribution allotments called for in section 5.f. of the October 2017 agreement.</i></p>
<p><u>NW Council 8/21/18:</u> 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.</p>	<p>While “ability to deliver” is used by some peer MPOs in similar programs, the measure is typically based on a sponsor’s past performance in meeting obligation goals or other pre-determined milestones. Since the STP-L program in NE IL has not had deadlines imposed in the past, there is no data available to judge a sponsor’s performance.</p> <p><i>Potential action: None proposed at this time.</i></p>
<p>Shared Fund: Overall Evaluation Criteria</p>	
<p><u>Hawthorn Woods (through Lake Council) 9/12/18:</u> The Village expressed that criteria/methodology proposed may work for an urban community/urban county but trying to make a “one stop shop” fit all when there are also suburban/more rural communities which may not fit well with the criteria. The Village understands that CMAP is trying to make a one stop shop methodology and small communities may score higher points in things such as green space/open space/watershed reserve, but there were more criteria where small communities will not get points and then could be at a disadvantage.</p> <p>Small communities aren’t always “travel sheds” but absorb cut through traffic. If the criteria points are based on population, that isn’t going to help</p>	<p>As noted, staff have developed criteria that allow broad access to funding while focusing on the goal of the shared fund to make “large and lasting contributions to regional priorities.” Community size is not an element in determining project readiness, need, improvement, or support for planning factors. Likewise, while a community may be small, the travel sheds of transportation facilities within that community may be extensive, offsetting the lower local density of population and jobs. While transit-supportive densities are a planning factor, they apply only to transit station and bus speed improvement projects, and account for a maximum of ten points out of 100 possible points.</p> <p><i>Potential action: None proposed at this time.</i></p>

Comment or Question	Staff Response
<p>suburban communities and they're going to be at a disadvantage.</p> <p>The Village respects the work CMAP is trying to do but doesn't support this work related to some communities in the collar counties because these areas are not trying to be an urban center. Many communities are trying not to be an urban center and to get the points they would have to add density and create sprawl and that puts them at a disadvantage for the Shared Fund. The Village understands that there are still local STP funds, but so that everyone has an equal opportunity for the larger Shared Fund the Village mentioned that the criteria being discussed puts some of the suburban communities at a disadvantage.</p>	
<p>Shared Fund: Project Readiness Evaluation Criteria</p>	
<p><u>NW Council Transportation Committee 8/16/18:</u> There should be partial points (vs. all or nothing) for the status of Phase 2 Engineering completion.</p>	<p>The initial staff proposal for the Phase 2 completion points was to give points only if Phase 2 was complete. Advisory members of the STP PSC suggested "ready to submit pre-final plans at 90%" as appropriate for receipt of these points, as this would give credit to sponsors that had developed plans, specifications, and estimates to a "substantial" level, but may not have formally submitted those plans for IDOT review.</p> <p>In order to fairly assess progress toward completion of Phase 2 engineering for partial points, IDOT would have to be consulted. Historically, IDOT has not had staff resources available to review plans that are not an official submittal, therefore it would be necessary to include review by IDOT as a part of the scoring criteria.</p>
<p><u>NW Council 8/21/18:</u> 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.</p>	
<p><u>NWMC 8/31/18:</u> The current project readiness criteria stipulate that projects can receive up to 10 points if they demonstrate substantial completion of phase II engineering or right of way acquisition. However, there is no sliding scale on which phase II engineering is judged to be substantially</p>	

Comment or Question	Staff Response				
<p>complete. Rather, projects either receive 5 points for having phase II engineering 85%-90% complete, or they receive no points for phase II engineering. This does not sufficiently reward communities who have still completed a substantial amount of engineering under the 85% threshold. A project for which no phase II engineering work has been completed should not score the same as a project for which a substantial amount of time and energy has been expended. This also raises a concern that this criterion will incentivize communities to substantially invest in the phase II engineering of a project in the hopes of gaining more points, only to risk seeing the project ultimately not be funded and the investment in phase II being lost.</p> <p>We propose that points should be awarded for substantial completion of phase II engineering that falls below the 85-90% threshold. Projects falling in this category should receive 2.5 points out of the possible 5 for phase II engineering completion. We suggest 50% as a threshold for receiving points, but the level of completion will of course be judged on a case-by-case basis. To that end, we also urge the committee to consider project scope and cost when judging whether to award points for phase II engineering. A project with a large scope may provide a larger benefit to the region than one with a smaller scope, yet under the current system the project with the smaller scope could be chosen over the larger project because its phase II engineering will be easier to complete. This may not require a change in the actual scores given to each project, but there should be some flexibility for</p>	<p><i>Potential action: Revise scoring based on IDOT review status:</i></p> <table data-bbox="756 352 1422 430"> <tr> <td><i>Preliminary plans submitted</i></td> <td><i>2.5 points</i></td> </tr> <tr> <td><i>Pre-final plans submitted</i></td> <td><i>5 points</i></td> </tr> </table> <p><i>Preliminary plans must meet the requirements of Chapter 63 of the IDOT BD&E Manual, section 63-1.02(b). Pre-final plans must meet the requirements of Chapter 63 of the IDOT BD&E Manual, section 63-1.02(c).</i></p>	<i>Preliminary plans submitted</i>	<i>2.5 points</i>	<i>Pre-final plans submitted</i>	<i>5 points</i>
<i>Preliminary plans submitted</i>	<i>2.5 points</i>				
<i>Pre-final plans submitted</i>	<i>5 points</i>				

Comment or Question	Staff Response								
<p>the committee to determine what "substantial completion" looks like for each individual project. Documentation should be provided indicating that project cost will be considered in the scoring for phase II engineering.</p> <p>Sample Scoring Table for Phase II Engineering</p> <table border="1" data-bbox="196 583 743 787"> <thead> <tr> <th>Level of Completion</th> <th>Points Awarded</th> </tr> </thead> <tbody> <tr> <td>0%</td> <td>0</td> </tr> <tr> <td>50%*</td> <td>2.5</td> </tr> <tr> <td>85-90%</td> <td></td> </tr> </tbody> </table> <p>*What qualifies as 50% completion is up to staff discretion. 50% is more of a placeholder meaning that substantial work has been completed, but completion of phase II engineering is not imminent.</p>	Level of Completion	Points Awarded	0%	0	50%*	2.5	85-90%		
Level of Completion	Points Awarded								
0%	0								
50%*	2.5								
85-90%									
Shared Fund: Financial Commitment Evaluation Criteria									
<p><u>Active Transportation Alliance 8/10/18:</u> Awarding points for financial commitment makes it harder for low-income, high-need communities to apply. This criteria should be eliminated.</p>	<p>This criterion is not used to determine eligibility, just to give additional funding priority if other funds have been committed. Some projects do have other funds committed, and the ranking system provides a slight advantage to them. Several other elements of the STP shared fund policies assist high-need communities.</p> <p><i>Potential action: None proposed at this time.</i></p>								
<p><u>NW Council Transportation Committee 8/16/18:</u> It is difficult to secure other sources because all programs want other funds to be committed, leading to a chicken/egg scenario.</p>									
<p><u>NW Council 8/21/18:</u> 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.</p>									

Comment or Question	Staff Response
Shared Fund: Inclusion in Plans Evaluation Criteria	
<p><u>DMMC 7/17/18:</u> 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?</p>	<p>Any publicly developed document that is the result of a planning or engineering study or effort that considered current and future transportation and mobility needs, including but not limited to those listed as examples in presentation slides and the draft application booklet, will be considered. The intent is to encourage the connection of planning to programming, which determines need and appropriate policies and projects that reflect local and/or regional transportation priorities.</p> <p>Should there be any questions regarding the use of a specific plan, staff will discuss those with the sponsor, partners, and/or appropriated council(s). If there is disagreement between staff and an applicant over what constitutes a plan, the STP PSC members will be consulted for a resolution, prior to the release of scores.</p> <p><i>Potential action: Update text, line 119: “Projects can receive up to 10 points if they are included in local or agency plans. <u>Acceptable plans are those that are subject to public review and have received local approval, including long range transportation plans, ITS plans, transit agency long range plans, capital improvement plans, and other local planning efforts, including those completed with CMAP LTA assistance. Federal requirements state that all funded projects must support implementation of the region’s long range transportation plan, and all eligible project types are supported in ON TO 2050. As such projects will not receive points for inclusion in ON TO 2050.</u>”</i></p>
<p><u>NWMC 8/3/18:</u> 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?</p>	
<p><u>DMMC 8/13/18:</u> The criteria for qualifying plans is unclear; Recommend that the local councils be the arbiter of whether a plan qualifies to ensure that local and regional priorities are given due consideration.</p>	
<p><u>NW Council Transportation Committee 8/16/18:</u> Perhaps guidance on what plans would <i>not</i> be considered, would provide clarity.</p>	<p><i>Potential action: Update text, line 119: “Projects can receive up to 10 points if they are included in local or agency plans. <u>Acceptable plans are those that are subject to public review and have received local approval, including long range transportation plans, ITS plans, transit agency long range plans, capital improvement plans, and other local planning efforts, including those completed with CMAP LTA assistance. Federal requirements state that all funded projects must support implementation of the region’s long range transportation plan, and all eligible project types are supported in ON TO 2050. As such projects will not receive points for inclusion in ON TO 2050.</u>”</i></p>
<p><u>NW Council 8/21/18:</u> 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?</p>	
<p><u>South/SW/NC/Central combined meeting 8/9/18:</u> Will multiple points be given for projects that are included in multiple plans?</p>	<p>No.</p> <p><i>Potential action: None proposed at this time.</i></p>

Comment or Question	Staff Response
Shared Fund: Transportation Impact Scores	
<p><u>DMMC 7/17/18:</u> 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?</p>	<p>As noted, cost effectiveness is included in the “improvement” component of the Transportation Impact category. However, the cost of the improvement is not germane to the other scoring categories (readiness and planning factors).</p> <p><i>Potential action: None proposed at this time.</i></p>
<p><u>NW Council Transportation Committee 8/16/18:</u> While it is understood that CMAP intends to score projects in all categories they may fit into and assign the highest score, projects that score “high” in multiple categories should be given additional points</p>	<p>All projects should be evaluated in the way most favorable to them. But since the total possible points for Transportation Impact needs to remain at 50, to accommodate points for benefits in multiple categories, the possible points for another portion(s) of the impact score would need to be reduced in order to implement the commenter’s suggestion. A definition of what a “high” score is would need to be proposed, along with a points scale.</p>
<p><u>NW Council 8/21/18:</u> 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.</p>	<p><i>Potential action: Insert text, line 101: “...and planning factors (see table below). <u>Projects that fit into multiple project types will be evaluated in each category and will be assigned to the project type with the overall highest score. Programmed projects...</u>”</i></p>
<p><u>NW Council Transportation Committee 8/16/18:</u> Benefits to important federal highways (Interstates or US Routes) from local projects are not captured in the scoring beyond the “travel shed.”</p>	<p>The travel model reflects travel on the entire federal aid network, independent of the maintenance jurisdiction or route designation.</p> <p><i>Potential action: None proposed at this time.</i></p>
<p><u>NWMC 8/31/18:</u> Currently, the transportation impact score does not directly take into account the availability of other transit options when evaluating a project. Within the existing condition/need score for road projects, there should be a factor that allocates points to projects that do not have transit alternatives located in close proximity. A simple way to measure this would be to measure the distance between the road</p>	<p>While this recommendation has some intuitive appeal, it is not in keeping with other elements of shared fund policy and CMAP funding programs. Under the CMAQ program, points are awarded for road projects that also benefit transit. Were this comment followed, it would specifically award points for <i>not</i> benefitting transit. These two funding programs should not be in conflict with one another.</p> <p><i>Potential action: None proposed at this time.</i></p>

Comment or Question	Staff Response
<p>and a parallel train or bus route or bicycle and pedestrian facility. *This distance could then be factored in along with information about pavement condition, safety, reliability, and mobility. Longer distances between a road and a parallel transit option should lead to a higher need score.</p> <p>*Bus routes located on the road in question should be disregarded.</p>	
<p><u>DMMC email 9/5/18:</u> Lines 138-140: The proposed weighting system for Transportation Impact will force projects in different categories (e.g. safety projects and bus speed improvements) to be weighted equally. Should the transportation impact of these unrelated categories be equally weighted?</p>	<p>This is an important discussion point, as the commenter is raising the question of whether, for example, a 20 percent improvement in safety in a corridor is as valuable to the region as a 20 percent improvement in bus speed in that corridor. Given the amount of discussion probably required to arrive at appropriate weightings, and the need to adhere to the STP agreement timelines, this issue should be revisited in the update for the second call for projects.</p> <p><i>Potential action: Project Selection Committee should consider as part of the regular review of the project selection methodology prior to future calls for projects.</i></p>
<p><u>DMMC email 9/5/18:</u> Lines 189-191: It is unclear how future demand is being considered in this calculation.</p>	<p>The improvement score is based on addressing current conditions, not future conditions. Estimating future conditions for each of the eight project types, with the need to measure differently for each, would introduce considerably more complexity and uncertainty. Note that future conditions will generally be considered during project design.</p> <p><i>Potential action: None proposed at this time.</i></p>
<p>Shared Fund: Rail/Highway Grade Separation Needs/Improvements Score</p>	
<p><u>NW Council 8/21/18:</u> Will school buses be included when bus counts are included in a project evaluation? If not, why not?</p>	<p>The level 2 grade crossing screening, which includes transit service as a factor, does not include school buses due to a lack of data availability throughout the entire region. While some local jurisdictions have collected this data, for a score that compares locations regionwide, all locations should have the same level and type of data</p>

Comment or Question	Staff Response
	<p>available. Should comparable data become available regionwide, it will be considered for inclusion in this criterion.</p> <p><i>Potential action: None proposed at this time.</i></p>
<p><u>DMMC email 9/5/18:</u> Line 208: It is unclear what is the specific data source for rail-highway grade crossing evaluation.</p>	<p>The change to the delay and safety elements of the Grade Crossing Screening Level 2 used to evaluate need for this project type will be used to determine the improvement.</p> <p><i>Potential action: Update text, line 208, to “The improvement to <u>the</u> delay and safety <u>components of the</u> Grade Crossing Screening Level 2 as a result of the project.”</i></p>
<p>Shared Fund: Transit Station Needs Score</p>	
<p><u>DMMC email 9/5/18:</u> Line 142: Transit station projects are to be evaluated using the Transit Economic Requirements Model. This model allows for different weightings for various criteria. Have those weights been established?</p>	<p>Transit station projects are to be evaluated using the 1 to 5 TERM rating scale, not the TERM model itself, so any additional criteria in the model do not come into play. (The purpose of the TERM model is to provide a national-level estimate of transit condition backlog based on investment over time.)</p> <p><i>Potential action: None proposed at this time.</i></p>
<p>Shared Fund: Needs Score (Road Reconstructions, Expansions, and Truck Route projects)</p>	
<p><u>DMMC email 9/5/18:</u> Lines 175-177: Different governments/agencies may have different methods for evaluation pavement conditions. How will those differences in methodology be resolved?</p>	<p>CMAQ is currently collecting pavement condition data for the entire federal-aid eligible system under a single contract region-wide. These data will be used for developing pavement condition scores.</p> <p><i>Potential action: None proposed at this time.</i></p>
<p>Shared Fund: Improvement Score (Road Reconstructions, Expansions, and Truck Route projects)</p>	
<p><u>DMMC email 9/5/18:</u> Line 223: CMAP included several new project features for road reconstructions, expansions and truck route projects. It is unclear how or why these features were selected.</p>	<p>The selected features are consistent with the CMAQ program evaluation.</p> <p><i>Potential action: None proposed at this time.</i></p>

Comment or Question	Staff Response
<u>Shared Fund: Population/Job Benefits Evaluation Criteria</u>	
<p><u>MCCOM 5/21/18:</u> 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 regional funds. 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.</p>	<p>This criterion does not necessarily favor higher density areas. Travel sheds for projects in low-density areas are generally larger than in more urban areas, as trips tend to be longer. A low job or population density may be offset by a larger travel shed.</p> <p><i>Potential action: None proposed at this time.</i></p>
<p><u>Hawthorn Woods (through Lake Council) 9/12/18:</u> Small communities aren't always "travel sheds" but absorb cut through traffic. If the criteria points are based on population, that isn't going to help suburban communities and they're going to be at a disadvantage.</p>	
<p><u>DMMC 7/17/18:</u> 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?</p>	<p>Travel sheds are determined by isolating project segments within the travel demand model using the "select link analysis" described below. The travel shed encompasses the traffic analysis zones from which the travelers using the links to reach their destinations originate and the zones containing those destinations.</p> <p><i>Potential action: None proposed at this time.</i></p>
<p><u>NWMC 8/31/18:</u> How will the travel demand model determine facility users? This is relevant for both the inclusive growth score a project receives and the population and jobs calculation for the transportation improvement score.</p>	<p>The CMAP travel model consists of four analytical steps: after breaking up the region into smaller "zones," the model (1) identifies how many trips will be generated from each zone, (2) how many trips will go to each zone, (3) which mode of transportation each trip takes, and (4) which particular set of roads or transit routes each trip</p>

Comment or Question	Staff Response
	<p>uses. Once step 4 is completed, a “select link analysis” can be used to identify the origin and destination zones of all trips using a particular transit route or road (or a proposed project). The demographics of the origin zones are used to estimate the demographics of the travelers.</p> <p><i>Potential action: None proposed at this time.</i></p>
Shared Fund: Planning Factors Evaluation Criteria (General)	
<p><u>DMMC 7/17/18:</u> What level of specificity is required in the local plans for “inclusion in plans” metric for Complete Streets, green sustainability, and transit supportive land use?</p>	<p>Examples have since been provided in the draft application booklet, which had not yet been distributed at the time this question was submitted.</p> <p><i>Potential action: None proposed at this time.</i></p>
<p><u>DMMC 7/17/18:</u> What is the rationale for not allowing “green infrastructure” points for all project categories?</p>	<p>The staff proposal attempted to balance the factors appropriate for each project type, while maintaining a total score of 25 points for each. Adding green infrastructure points to a project type would require reducing a different factor’s points.</p> <p><i>Potential action: None proposed at this time.</i></p>
<p><u>NWMC 8/3/18; NW Council Transportation Committee 8/16/18:</u> Additional specifics/guidance is needed for all planning factors, particularly green infrastructure and transit supportive land use, to best prepare our members to develop their policies and potential projects.</p>	<p>Links to background data were provided in the draft application booklet.</p> <p><i>Potential action: Staff will work on other materials to assist, similar to the Complete Streets Toolkit.</i></p>
<p><u>NWMC 8/31/18:</u> Will CMAP provide specifics on planning such as including green infrastructure?</p>	
<p><u>NW Council 8/21/18:</u> 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</p>	<p>The inclusive growth planning factor applies to all project types because of the centrality of inclusive growth in ON TO 2050 and because all project types have the potential to improve travel conditions for disadvantaged users. See additional information in responses related to the inclusive growth planning factor.</p>

Comment or Question	Staff Response
<p>growth a factor in evaluating rail-highway grade crossings?</p>	<p>The complete streets planning factor gives points both for having complete streets elements in a project as well as for a sponsor having a policy or ordinance, which is meant to help encourage local governments to adopt them.</p> <p><i>Potential action: None proposed at this time</i></p>
<p>Shared Fund: Inclusive Growth Planning Factor</p>	
<p><u>DMMC 7/17/18:</u> For the “inclusive growth” metric, how will the boundaries of the relevant geography determined? What is the dataset used for this determination?</p>	<p>In the shared fund, inclusive growth is scored based on the demographic characteristics of the users of a project, not on the geographic location of the project. The demographics of project users are determined from the CMAP travel demand model, which estimates the origin and destination of each trip on the project segment(s). Note that because the destination is factored in, the method recognizes the role job centers play in providing employment to residents across the region.</p> <p><i>Potential action: None proposed at this time.</i></p>
<p><u>DMMC 8/13/18:</u> The applicant should be allowed to establish the boundaries of the relevant geography for “inclusive growth”.</p>	
<p><u>NWMC 8/3/18:</u> 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.</p>	<p>Inclusive growth evaluation is intended to capture the importance of transportation investments to populations that struggle to get from home to jobs. As one of the three main themes of ON TO 2050, the higher point value reflects this factor’s importance to meeting regional goals. Also, all Councils in the region have disadvantaged communities.</p> <p><i>Potential action: None proposed at this time.</i></p>
<p><u>NW Council Transportation Committee 8/16/18:</u> Inclusive growth scoring favors the city of Chicago and south suburbs.</p>	
<p><u>Active Transportation Alliance 8/10/18:</u> A portion of shared funds should be set-aside for communities that meet CMAP’s definition of high-need communities for the LTA program.</p>	<p>The use of set-asides within the shared fund would dilute the consideration of the wide range of factors that are important to the region.</p> <p><i>Potential action: None proposed at this time.</i></p>
<p><u>NW Council Transportation Committee 8/16/18:</u> Is this evaluation factor something CMAP came up with, or is it used in other parts of the country?</p>	<p>It is used in other parts of the country, for example in the Minneapolis MPO (Metropolitan Council) scoring process for CMAQ and STP, which uses the measure “connection to disadvantaged populations” in its regional project solicitation.</p>

Comment or Question	Staff Response
<p><u>NW Council 8/21/18:</u> 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?</p>	<p><i>Potential action: None proposed at this time.</i></p>
<p><u>Lake Council Transportation Committee 7/26/18; South/SW/NC/Central combined meeting 8/9/18; NW Council Transportation Committee 8/16/18:</u> Race/ethnicity should not be a factor, only income. A suggestion was made [Lake] to give separate points for low income only and minority only.</p>	<p>The concept of inclusive growth used in ON TO 2050 includes both race and poverty because economic outcomes in the Chicago region frequently reflect racial disparities. For example, residents of color, particularly black residents, often experience lower incomes, higher unemployment, and longer commutes. Many of these residents must commute to jobs located far from their homes and far from frequent transit service. Making transportation investments that further inclusive growth will help the whole region succeed.</p> <p><i>Potential action: None proposed at this time.</i></p>
<p><u>NW Council 8/21/18:</u> 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?</p>	
<p><u>WCGL Member 9/4/18:</u> The definition used for communities under the Inclusive Growth Planning Factor disregards many rural communities that may fall below the poverty line because they are white.</p>	
<p><u>Fox Lake (through Lake Council) 9/12/18:</u> The Village has a concern with how Inclusive Growth is evaluated as part of the scoring with the STP Shared Fund. Of specific concern are communities that may have a large population below the poverty line, such as communities with a large population of low income families, senior citizens and/or a large amount of Section 8 housing, but this population does not include “people of color”. How would that factor in with the Inclusive Growth criteria used for the regional STP fund?</p>	

Comment or Question	Staff Response
<p>During the Lake County Paratransit Market Analysis Community meetings in January 2018, the Village of Fox Lake was shown to be one of the neediest areas for transportation needs in Lake County.</p>	
<p><u>Hawthorn Woods (through Lake Council) 9/12/18:</u> The Village has a concern with the Inclusive Growth evaluation as economically disadvantaged isn't defined by color.</p>	
<p><u>NW Council Transportation Committee 8/16/18:</u> There is concern that the evaluation does not consider whether the area being served by a project provides access to job markets.</p>	<p>As noted above, project users are determined based on both trip origins and destinations. Thus, if a project serves a job center and is used by a significant number of lower income and minority residents to access jobs, the inclusive growth method will capture that. Furthermore, the absolute number of jobs served by a project is also captured in the Population/Jobs Benefits criterion.</p> <p><i>Potential action: None proposed at this time.</i></p>
<p><u>NW Council 8/21/18:</u> 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.</p>	
<p><u>NWMC 8/31/18:</u> How will the travel demand model determine facility users? This is relevant for both the inclusive growth score a project receives and the population and jobs calculation for the transportation improvement score.</p>	<p>The CMAP travel model consists of four analytical steps: After breaking up the region into smaller "zones," the model (1) identifies how many trips will be generated from each zone, (2) how many trips will go to each zone, (3) which mode of transportation each trip takes, and (4) which particular set of roads or transit routes each trip uses. Once step 4 is completed, a "select link analysis" can be used to identify the origin and destination zones of all trips using a particular transit route or road (or a proposed project). The demographics of the origin zones are used to estimate the demographics of the travelers.</p> <p><i>Potential action: None proposed at this time.</i></p>

Comment or Question	Staff Response
Shared Fund: Complete Streets Planning Factor	
<p><u>NWMC 8/3/18:</u> The Conference supports the move to include Complete Streets policies at equal weight to Complete Streets Ordinances.</p>	<p>Noted. <i>Potential action: None proposed at this time.</i></p>
<p><u>Active Transportation Alliance 8/10/18:</u> All factors used to evaluate the transportation impact of road projects should be multimodal, rather than having a separate score for Complete Streets. If this change is not made, the points for complete streets should be increased due to the safety benefits for all users.</p>	<p>The most streamlined approach is to use factors specific to the project type as the main evaluation and separately score common factors such as complete streets. The main purpose of projects such as bridge reconstruction and road reconstruction are to allow for motorized traffic, and so the transportation impact criteria evaluate these benefits. Because the planning factors must add up to 25, other planning factors would need to be decreased in order to increase the weight of the complete streets factor. <i>Potential action: None proposed at this time.</i></p>
<p><u>NW Council Transportation Committee 8/16/18:</u> It is unclear why having policies, if projects don't have complete streets elements, will add to the project score.</p>	<p>The complete streets planning factor is meant both to encourage <i>projects</i> to have complete streets elements as well as to encourage <i>sponsors</i> to adopt complete streets policies or ordinances. However, it may not always be appropriate or feasible for a project to have complete streets elements. Best practices for developing complete streets policies include a transparent process for dealing with exceptions. FHWA guidance on accommodating bicycle and pedestrian travel named three exceptions that have become commonly used in Complete Streets policies: 1) accommodation is not necessary on corridors where non-motorized use is prohibited, such as interstate freeways; 2) cost of accommodation is excessively disproportionate to the need or probable use; 3) a documented absence of current or future need. The staff proposal would include points for projects that go through the exceptions process. <i>Potential action: Insert text, line 272-273, "...and the other half if the project contains complete streets elements or has documented an exception to complete streets policies during phase 1 or phase 2 engineering."</i></p>
<p><u>Lake Council 9/12/18:</u> Complete streets are a planning factor being used to score each project type. Current best practices in Complete Streets calls for Context Sensitive Solutions. The scoring criteria states that half of the available points will be awarded if a project has complete streets components. The LCCOM requests that if a context sensitive analysis of the project was done and it was determined that no new non-motorized facilities be added as a part of the improvement, the project receives points in the category for following Complete Streets Best Practices.</p>	

Comment or Question	Staff Response
<p><u>DMMC Trans Tech/Trans Pol combined meeting 7/26/18:</u> Suggestion to make complete streets worth 10 points across all project categories.</p>	<p>Since the planning factors have to add up to 25, other planning factors would need to be decreased in order to increase the weight of the complete streets factor.</p> <p><i>Potential action: None proposed at this time.</i></p>
<p>Shared Fund: Transit Supportive Land Use Planning Factor</p>	
<p><u>NW Council Transportation Committee 8/16/18:</u> There is concern that residential densities and non-residential building heights are not the right criteria. Suggested alternatives were pedestrian infrastructure/usage around stations/routes and consideration of destinations in proximity to stations, such as employment centers or entertainment venues. Consideration of the density at the destination of users of suburban stations (City of Chicago, for example, as the destination of Metra riders) was also suggested.</p>	<p>Transit systems work better when they serve more concentrated demand. The number of people and jobs within the station catchment area largely defines ridership potential. Thus, the main transit-supportive land use change is increasing residential or employment density near transit stations or stops, as implemented practically through zoning changes. Other things being equal, it is more beneficial to invest in bus speed and reliability improvements when municipalities along the route are committed to using their land use authority to encourage use of transit. The chief purpose of this planning factor is to encourage municipalities to plan for higher densities to support investments in transit stations and bus speed improvements.</p>
<p><u>NW Council 8/21/18:</u> It is unclear how density, parking, and zoning directly impact bus speed and reliability improvements. Can CMAP clarify the intent of this factor?</p>	<p>The role of major destinations is factored in as part of non-residential density. As for the specific measure of non-residential density, there is no perfect metric, and building height is better aligned with how modern zoning codes are written than the chief alternative, the floor area ratio (FAR). This approach also avoids complicated math when combining FAR with minimum setbacks. However, non-residential density can be difficult to represent appropriately, as the commenters allude to.</p>
<p><u>NW Council 8/21/18:</u> 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.</p>	<p>The role of major destinations is factored in as part of non-residential density. As for the specific measure of non-residential density, there is no perfect metric, and building height is better aligned with how modern zoning codes are written than the chief alternative, the floor area ratio (FAR). This approach also avoids complicated math when combining FAR with minimum setbacks. However, non-residential density can be difficult to represent appropriately, as the commenters allude to.</p>
<p><u>NWMC 8/31/18:</u> Transit supportive land uses are vital to the effectiveness of local transportation networks. However, the current means of determining transit support land uses through building height allowed by zoning is an insufficient measure of</p>	<p><i>Potential action: Insert text, line 308: "CMAP staff will also consider additional information provided by applicants that notes where potential transit users within a ½ mile of a station or stop may be higher than the zoning might suggest."</i></p>

Comment or Question	Staff Response
<p>transit supportive land use. High densities alone cannot support transit if the network does not connect to major destinations. Major destinations (colleges, shopping centers, etc.) may have low heights permitted by zoning but may have a high number of users and a high level of need.</p> <p>[examples were attached to comments]</p> <p>Potential solution. At committee discretion, projects near major destinations (colleges, manufacturing hubs, shopping centers, etc.) should be given full points.</p>	
<p><u>DMMC email 9/5/18:</u> Line 306: A project that consolidates access (e.g. a park-and-ride lot) will not get consideration for the collected users if that lot is located in an area with low-density zoning. The transit supportive land use requirements may be difficult to achieve in many communities.</p>	<p>Park-and-ride lots are neither transit station nor bus speed improvement projects.</p> <p><i>Potential action: None proposed at this time.</i></p>
<p>Shared Fund: Green Infrastructure Planning Factor</p>	
<p><u>NW Council 8/21/18:</u> 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.</p>	<p>Links to some background data were provided in the draft application booklet, however sponsors do need additional information for some of the planning factors.</p>
<p><u>DMMC email 9/5/18:</u> Line 279: CMAP failed to provide clarity on the green infrastructure category. What specific policies or project features are required to achieve these points?</p>	<p><i>Potential Action: Staff will work on other materials to assist, similar to the Complete Streets Toolkit.</i></p>
<p>Shared Fund: Council/CDOT Bonus Points</p>	
<p><u>Planning Liaison meeting 8/3/18:</u> Points should be awarded after the rest of the scoring is completed and published.</p>	<p>The inclusion of bonus points is intended to allow each subregion to indicate their highest priority project(s) among all applications. By assigning bonus points prior to receiving rankings, the points are more likely to reflect the underlying transportation preferences of the subregion. If</p>
<p><u>DMMC 7/17/18:</u> When during the process would the local councils notify CMAP of the allocation of</p>	

Comment or Question	Staff Response
<p>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?</p>	<p>bonus points are assigned after the rankings are known, they are more likely to be used to influence the rankings.</p>
<p><u>DMMC 7/17/18:</u> It appears possible that the allocation of local council/CDOT “bonus points” could be sufficient to allow an otherwise low-scoring project to receive funding. Will there be any restrictions on such an outcome?</p>	<p><i>Potential action: The timeframe for allocation of bonus points will be shown in the Program Development Schedule included in the application booklet.</i></p>
<p><u>DMMC Trans Tech/Trans Pol combined meeting 7/26/18:</u> Points should be awarded after the rest of the scoring is completed and published.</p>	
<p><u>DMMC email 9/5/18:</u> Line 309: CMAP clarified that local council bonus points will be required to be submitted before scoring of projects. This could result in “wasted” bonus points.</p>	
<p>Shared Fund: Award Limits</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>	<p>Setting such limits, particularly by geography or sponsor, is similar to pre-determined distribution or suballocation of funds and may defeat the purpose of a regional program. Additionally, a goal of the Shared Fund is to complete gaps and only select projects that will be fully funded. Setting funding limits may have the unintended consequence of preventing full funding of projects, decreasing the likelihood of projects moving forward to completion.</p> <p><i>Potential action: None proposed at this time.</i></p>
<p><u>DMMC 8/13/18:</u> There should be a maximum award size; either maximum dollar amount or share of available funds.</p>	

Comment or Question	Staff Response
<p><u>DMMC 7/17/18:</u> Will there be limits on: size of award of federal funding for an individual project, applications per sponsor, applications per council/CDOT, number of funded projects by sponsor of council/CDOT?</p>	
<p><u>NWMC 8/3/18 and 8/31/18:</u> Will there be limits on the number of applications an individual municipality or council can submit each cycle?</p>	
<p>Shared Fund: Geographic Equity</p>	
<p><u>DMMC 7/17/18:</u> Does the proposed methodology address geographic equity in any direct way? Is there an intent to monitor and/or manage this issue?</p>	<p>There is no direct scoring criterion related to geographic equity. However, the issue will be monitored. Given the scoring system and CMAP’s experience with CMAQ, it is CMAP’s expectation that over several funding cycles, the proportionate awards to each council/CDOT will be roughly equal to the proportionate requests from each council/CDOT. Furthermore, the types of projects being targeted for this program should have an impact on regional geographies far beyond the physical location of the individual projects, and therefore location-based scoring for the purpose of targeting a dollar amount or number of projects by geography is not proposed.</p> <p><i>Potential action: None proposed at this time.</i></p>
<p>Shared Fund: Evaluation Measures Data</p>	
<p><u>DMMC 7/17/18:</u> 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?</p>	<p>Static data sets that CMAP is permitted to share (based on agreements with data providers) will be made available, primarily through links in the application booklet. However, some of the data, such as travel sheds used for population/jobs benefits, are generated by running the travel demand model. It is not practical for CMAP to run a travel-shed analysis for every possible combination of segments that may make up individual projects prior to receiving applications. The model will only be run for submitted projects once applications are received. Additionally, while raw data can be provided, the need and</p>
<p><u>NWMC 8/3/18:</u> Councils and municipalities require as much information as possible on the outside evaluation data (i.e. safety</p>	

Comment or Question	Staff Response
<p>improvement score, cost effectiveness calculation) before the allocation cycle.</p> <p><u>NWMC 8/31/18:</u> Will CMAP provide information on the outside evaluation data (i.e. safety improvement score, cost effectiveness calculations) before the allocation cycle?</p>	<p>improvement scores are scaled relative to the pool of applications received; so while access to the data may provide applicants with a raw value, the actual scaled score will vary depending on the pool of applications received.</p> <p><i>Potential action: Provide links to available data sets within the application booklet.</i></p>
<p>Active Program Management: Use of Contingency Programs</p>	
<p><u>NWMC 8/3/18; NW Council Transportation Committee 8/16/18:</u> We are 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.</p>	<p>Each council, CDOT, and the region (shared fund) have a responsibility to fully utilize the allotted funding. Maintaining a contingency list is intended to enhance full use of funding by providing a “fall back” of replacement projects that can readily utilize funds. If a council and/or individual sponsor does not want to commit to keeping contingency projects active, that is their choice. However, one potential consequence of that decision may be that funds allocated to that council will be obligated by others that have contingency lists.</p> <p><i>Potential action: None proposed at this time.</i></p>
<p><u>Lake Council 9/12/18:</u> The LCCOM has concerns with the proposed contingency list as described in the draft policy document. There are concerns that enough sponsors will be willing and/or able to keep a project moving through the federal process without the guarantee of federal funding in the future.</p>	
<p><u>Lake Council 9/12/18:</u> An additional concern is that by not allowing a conformity project on the contingency list it will further limit the usefulness of the contingency list.</p>	<p>Projects that include Not Exempt work types must be included in a semi-annual conformity analysis prior to inclusion in the TIP. According to federal rules, projects cannot be included in the conformity analysis if funds have not been identified for phases beyond Phase 1 Engineering. Because the contingency program is not a guarantee of funding, projects contained in that program cannot be conformed. Additionally, contingency programs expire at the end of each call for projects cycle (line 81-82), and it may take up to six months from the time a project requests inclusion in a conformity analysis to the time when the MPO Policy</p>

Comment or Question	Staff Response
	<p>Committee approves that analysis. However, using active reprogramming, it could be possible for a project phase to be reprogrammed from the contingency program into an out year of the active program, which would meet the requirements for inclusion in a conformity analysis.</p> <p><i>Potential Action: Revise text, lines 75-77, to: “Projects requiring a conformity determination cannot be included in any contingency program, unless those projects that are not already included in the current conformed TIP <u>may be included in contingency programs, but cannot be reprogrammed into the current year of the active program after the TIP change submittal deadline for the spring semi-annual conformity analysis. These projects can be reprogrammed into an out year of the active program.</u>”</i></p>

Active Program Management: Designated Project Managers

<p><u>WCGL Member 9/4/18:</u> Page 5, under Designated Project Managers there are definitions for Technical & Financial Project Managers but then in the following paragraph it states “For each project phase utilizing consulting services, a Consultant Project Manager must also be designated.”</p> <ul style="list-style-type: none"> • Yet there is no definition of a Consultant Project Manager. • Why is a Consultant Project Manager (CPM) even needed as part of the description of the responsibilities for the Technical Project Manager (TPM) includes “... overseeing the implementation of the project, managing any consultants involved in the project, ensuring that all federal,...” ? • If the TPM is already overseeing the consultant what are the responsibilities of the CPM? 	<p>The intent is for a primary contact person to be named for each project management role. This information will become a part of the project record in CMAP’s eTIP database and will be accessible to all implementation partners, including IDOT and FHWA, so that they can direct questions about the project to the appropriate person. This information is also included on IDOT paperwork, such as the Project Program Information (PPI) form, and should be readily available. Having responsible parties formally designated helps all involved keep up with staffing changes that may occur over the life of the project. In interviews with participants in the STP program, staffing changes were brought up as an issue that may lead to implementation delays.</p> <p><i>Potential action: None proposed at this time.</i></p>
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Comment or Question	Staff Response
Active Program Management: Obligation Deadlines	
<p><u>NWMC 8/3/18:</u> 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.</p>	<p>A total of 18 months (a full FFY + six-month extension) to bring a project phase to obligation (in other words, start that phase) should be more than enough time. The quarterly status updates will serve as a guide for determining if it is appropriate for a project phase to be included in the “current year,” which is the only year that has a deadline. The reports will also allow identification of “across the board” patterns of delay caused by any reviewing agency and/or changes to state or federal policies or procedures.</p>
<p><u>KKCOM Transportation Policy 7/19/18; South/SW/NC/Central combined meeting 8/9/18; NW Council Transportation Committee 8/16/18:</u> 6 months is not a long enough extension.</p>	<p>Early in the policy development process, staff had proposed three-month extensions for engineering and right-of-way phases. In conversations regarding this early proposal, at the urging of the region’s planning liaisons, staff revised the proposal to allow six-month extensions for all phases. During those conversations, FHWA indicated that the longer the grace period, the more critical “hard deadlines with no exceptions” will become. A shorter grace period allows the region greater flexibility to react to changing circumstances.</p>
<p><u>Council of Mayors Executive Committee 8/21/18:</u> Concerned that six-month extensions are not sufficient due to delays beyond sponsor control.</p>	<p>The use of obligation deadlines is not intended to cause projects that are reasonably moving forward to “lose” funding. Instead, the deadlines are intended to ensure that implementation of individual project phases begins in a timely manner and the sponsor continues to pursue completion as quickly as possible. However, CMAP acknowledges that in cases where the sole reason for delay is due to review of agreements, a longer extension may be necessary. With Active Program Management taking effect for the Shared Fund beginning in FFY 2020, there will be an opportunity to evaluate, as a region, the effectiveness of the policies prior to their application in the local programs.</p>

Comment or Question	Staff Response
	<p><i>Potential action: Insert text, line 187: “If the end of the six-month extension period has been reached, and the phase remains unobligated solely due to agreement review, and the agreement was submitted to IDOT before August 1st of the prior year in a good faith attempt to ensure timely obligation of funds within the programmed FFY, an additional three-month extension will be automatically granted for that phase. The additional extension will be to June 30 for engineering and right-of-way phases, and to the federal authorization date for the August state letting for construction/construction engineering phases.”</i></p>
<p><u>Planning Liaison meeting 8/3/18:</u> Clarification is needed in the last sentence of footnote 3 regarding staged construction.</p>	<p>Noted.</p> <p><i>Potential Action: Update text to “...are not considered fully obligated until all stages/phases <u>under a single State Job or Federal Project Number</u> are fully obligated.</i></p>
<p><u>Planning Liaison meeting 8/3/18:</u> Requested clarifying language in line 203.</p>	<p>Noted.</p> <p><i>Potential Action: Edit text, line 203, “Requests for extensions will be reviewed by selecting body staff <u>or the selecting body</u>, in consultation with...”</i></p>
<p><u>WCGL Member 9/4/18:</u></p> <ul style="list-style-type: none"> • Obligation Actions & Milestone Deadlines should note that these are particular to the involvement of federal funding in the particular phase of the project. For example, if there are no federal funds being utilized in Phase 2, you could submit agreements to IDOT prior to DA • Under Phase 2 Engineering & Right-of Way Milestones, I don’t believe it is necessary to distinguish Design Approval as Phase 1 Design Approval. DA only happens once in the process. • Similarly, under Construction (state) Milestones, I don’t believe it is necessary to call them out as Phase 2 pre-final plans, when Phase 2 is the only time in the process when we talk about pre-final plans. 	<p>The intent of the table is to describe milestones to be met in order to obligate federal funds. If federal funds are not being used for a phase, there is not an obligation deadline, and thus no milestone to be met for the phase.</p> <p><i>Potential Action: Edit text as follows.</i></p> <p><i>Line 168 - 169: “Table 3 describes the action(s) necessary to obligate each <u>federally funded</u> phase, and the milestone deadlines that should be met in order to meet the obligation requirement.”</i></p> <p><i>Table 3 “Phase” column header: “<u>Federally Funded Phase</u>”</i></p> <p><i>Table 3 “Obligation Action” column header: “<u>Federal Obligation Action</u>”</i></p>

Comment or Question	Staff Response
Active Program Management: Active Reprogramming	
<p><u>Lake Council 9/12/18:</u> The LCCOM fully supports the staff proposal described in lines 234-236, in which a Council that has fully obligated its allotment for the fiscal year may seek additional funding from the STP Shared Fund, this staff recommendation provides needed flexibility to the local programs to deliver projects in a timely manner.</p>	<p>Noted.</p> <p><i>Potential action: None proposed at this time.</i></p>
Active Program Management: Reprogramming/Inherited Deadlines	
<p><u>DMMC 7/17/18:</u> 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 replaces.” 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?</p>	<p>Only phases programmed in the current year are subject to deadlines. If a phase is moved out of the current year (to an out year or contingency program), and another phase from a different project is moved into the current year, only the phase moved into the current year is subject to the current year deadline. If this reprogramming occurs during an extension period, the phase replacing the extended phase being reprogrammed is subject to the extension deadline. No subsequent phases, whether funded in out years or the contingency program, are subject to any deadlines as a result of the reprogramming. The only time the subsequent phases of a project are impacted by the current year phase deadlines would be if a current year phase missed the end of FFY (or extended) deadline. In those cases, the current year phase and any subsequent phases in the out years are moved to the contingency program.</p> <p><i>Potential action: None proposed at this time.</i></p>
<p><u>DMMC 8/13/18:</u> If the replacement project is obligated in the same year as the replaced project that should be sufficient.</p>	
Active Program Management: Carryover Limitations/Redistribution of Unobligated Funds	
<p><u>NWMC 8/31/18:</u> 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</p>	<p>The deadline for obligating funds carried over with an extended project phase is the same as the obligation deadline for the project phase. Any other funds that are carried over are not related to the status of individual projects (e.g., obligation remainders). Placing an expiration on unprogrammed carried over funds ensures that unobligated balances do not “pile up” within a</p>

Comment or Question	Staff Response
<p>due diligence to move a project forward, will there be an adoption of a longer period to reprogram funds?</p>	<p>single program (council, CDOT, or shared fund). The demand for this limited fund source is significant, requiring collective action from the region to ensure all available funds are used in a timely manner.</p> <p><i>Potential action: None proposed at this time.</i></p>
<p>Active Program Management: Accessing redistributed funds</p>	
<p><u>DMMC 7/17/18:</u> 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?</p>	<p>CMAP staff will determine if funds are available to accommodate requests for both cost increases and advancing phases from out years or contingency programs. Access to funds will be on a “first ready, first funded” basis. In the event there are multiple simultaneous requests and not all can be accommodated, the guidelines outlined in the APM policies document will apply (regional before local, increases before advances, construction before ROW before ENG 2, etc.). The STP PSC will have final say to resolve questions or disputes. “First ready” will be determined by the obligation date associated with the request, not by the order of the request.</p> <p><i>Potential action: None proposed at this time.</i></p>
<p><u>Lake Council 9/12/18:</u> The LCCOM requests a revision to the Shared Fund “hierarchy” as described in Lines 302-308. The LCCOM requests that local Council projects be given priority over Shared Fund projects based on their work type. The LCCOM recognizes that a local Council resurfacing project should not receive priority over a Shared Fund reconstruction project, however the LCCOM requests that a local Council reconstruction project be given priority over a Shared Fund reconstruction project.</p>	<p>The hierarchy of priority access to redistributed funds should only be utilized if there are more requests for immediate obligation than there are funds available to accommodate those requests. Because the redistributed funds may come from all across the region, and shared fund projects are regional in nature, it follows that they should be given priority for redistributed funding over local projects.</p> <p><i>Potential action: None proposed at this time.</i></p>
<p><u>Lake Council 9/12/18:</u> The LCCOM requests that staff consider a softening of the language in lines 320-321. Recognizing that the region must hold</p>	<p>Practically speaking, because requests for the use of shared funds should only be made when obligation is “imminent,” it is unlikely that an obligation will not occur. The policy, which states that future</p>

Comment or Question	Staff Response
<p>project sponsors accountable, we must also recognize that administrations, staffing, and priorities locally can change as well. The LCCOM requests that for example, a new staff or administration is not prevented from accessing the Shared Fund for the failure of a previous administration or staff to obligate funding.</p>	<p>requests from the sponsor <i>may</i> be denied, is not intended to punish current sponsor administrations for the performance of past administrations, but rather to protect all sponsors' access to the funding by ensuring accountability for requests.</p> <p><i>Potential action: None proposed at this time.</i></p>
<p>Active Program Management: Grandfathering existing projects</p>	
<p><u>DMMC 7/17/18:</u> 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?</p>	<p>This policy allows each council/CDOT to determine rules in their methodologies for grandfathering projects in their current programs into their FFY 2021-2025 programs as a part of the initial calls for projects that open in January 2020.</p>
<p><u>DMMC 8/13/18:</u> Unobligated projects in council programs on 12/31/2018 should be grandfathered into the new programs using the rules current as of 12/31/2018. The new rules should only apply to projects that receive funding from any call for projects after 12/31/18.</p>	<p>Grandfathering will be valid for the first call cycle only. All grandfathered project phases will be subject to all of the new APM rules and to each council’s individual methodologies beginning on October 1, 2020. Continuing to carry projects forward subject to different rules would be in conflict with the October 2017 agreement.</p>
<p><u>Lake Council 9/12/18:</u> The LCCOM supports the staff recommendation on the “grandfathering” of local STP projects that are currently active during the FFY2018-2020 transition period. LCCOM thanks CMAP for allowing individual Council’s the flexibility to handle the limited number of these projects consistent with their own local priorities.</p>	<p>Two potential grandfathering policies being discussed at councils are: 1. Grandfathered projects will be programmed in the FFY 2021-25 program “off the top” before new projects are added; 2. Existing projects must apply and be scored to be programmed, but they will be given bonus points for past progress not available to new project applications.</p> <p><i>Potential action: Insert text in new section at end of policies document specifying the effective date of the application of APM Polices to grandfathered projects.</i></p>
<p>Active Program Management: Use of TDCs</p>	
<p><u>NWMC 8/3/18 and 8/31/18:</u> We request clarification on the use of Toll Development Credits (TDC) and their impact on the region’s STP funds. Will the</p>	<p>While the use of TDCs may be permitted by the State (TBD), CMAP’s proposed policy would limit the use to communities in the highest need category. The use would not be automatic; the</p>

Comment or Question	Staff Response
<p>use of TDCs reduce the funds that some or all Councils will receive?</p>	<p>programming body (PSC for Shared Fund, Council/CDOT for local programs) would decide by policy or project-by-project. Using TDCs means the project will use more federal funds. That use would be programmed against that selecting body's mark and would not be "taken off the top" of the region's allotment.</p> <p><i>Potential action: None proposed at this time.</i></p>
<p>Active Program Management: Effective Date</p>	
<p><u>DMMC 7/17/18:</u> 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?</p>	<p>The Shared Fund will be subject to APM Program Development policies with the opening of the first CFP in January 2019. Project Management, Program Management, and Other Provisions take effect with the start of the first FFY of the program on October 1, 2019. Similarly, APM Program Development polices for local programs take effect in January 2020, and the balance of policies take effect on October 1, 2020. Should any project currently being implemented as part of a local program be selected for funding from the shared fund in the first call, that project would become subject to APM policies on October 1, 2019.</p> <p><i>Potential action: Insert "Effective Date" section at the end of the document containing the above text.</i></p>
<p><u>NWMC 8/3/18; NWMC 8/31/18:</u> 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.</p>	<p><i>Potential action: Insert "Effective Date" section at the end of the document containing the above text.</i></p>
<p>Agreement Provisions: Needs-Based Distribution</p>	
<p><u>DMMC 7/17/18; DMMC 8/13/18:</u> While funding is based on "need" and "performance measures", there are no assurances that the funded projects will address those needs. Without explicit cost-effectiveness scoring, this concern remains.</p>	<p>Cost-effectiveness is applied to the "improvement" score that is related to the direct benefit(s) of the project.</p> <p><i>Potential action: None proposed at this time.</i></p>
<p><u>Active Transportation Alliance 8/10/18:</u> The Chicago region is unique in the use of sub-regional programming bodies. Future agreements should require that 100% of funds are programmed by the MPO.</p>	<p>Noted. The City of Chicago, Council of Mayors, and MPO Policy Committee may elect to consider this recommendation when the STP agreement is updated.</p> <p><i>Potential action: None proposed at this time.</i></p>

Comment or Question	Staff Response
Agreement Provisions: Regional Goals	
<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>While geographic equity is a qualitative consideration in any funding, the specific goal of this federal program is to address regional performance targets and priorities of the regional long range transportation plan. Local priorities continue to be addressed through the local programs. According to the STP agreement, ON TO 2050 goals are to be addressed by the local programs, but they are a relatively small part of the scoring (25 percent) and the councils/CDOT have wide latitude in how to consider them.</p> <p><i>Potential action: None proposed at this time.</i></p>
Agreement Provisions: Adding Improvement Score to future distribution formulas	
<p><u>DMMC 7/17/18:</u> There has been 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 complete?</p>	<p>Work on the development of changes to the distribution formula to incorporate improvement to conditions has not begun. The agreement calls for this work to be complete and approved by the STP PSC by December 31, 2019. Staff anticipates beginning work on this task in late 2018/early 2019. Assistance from planning liaisons, CDOT, and other partners is anticipated.</p> <p>Because need is determined based on actual facility conditions, it follows that assessment of improvement would also be based on changes to the actual conditions since the last measurement, not on programmed improvements. Improvements may be due to STP-funded projects, or projects funded with other state, federal, local, and/or private sources.</p> <p><i>Potential action: None proposed at this time.</i></p>
General: Ensure selected projects meet the goals of the agreement and regional plan	
<p><u>NWMC 8/3/18 and 8/31/18:</u> 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.</p>	<p>While not required by the agreement, regular review of shared fund programs and local programs to ensure that federal funds are being expended in a timely manner in support of national, state, regional, and local goals makes sense.</p>

Comment or Question	Staff Response
	<i>Potential action: Establish a timeline for program reviews.</i>
General: Match requirement	
<u>Active Transportation Alliance 8/10/18:</u> Required match should be from 0-20%, using the LTA formula for defining high-need communities.	The minimum match for federal STP funds is 20%. This is not a program rule, but a part of the FAST Act. The LTA program is able to reduce match by funding projects with non-federal funds. <i>Potential action: None proposed at this time.</i>
General: Procedural	
<u>NWMC 8/31/18:</u> Will there be a process or timetable to dispute the committee's shared fund scoring?	Staff-developed scores will be presented to the STP PSC for discussion during open committee meetings. The program development timeline is being finalized and will be included in the application materials. <i>Potential action: Note opportunities for comment during the program development process in the application booklet.</i>
<u>Council of Mayors Executive Committee 8/21/18:</u> Suggested having the suburban membership of the PSC rotate with fixed length terms in order to ensure that the PSC represents the range of municipal perspectives in the region.	Designating members to represent the CoM EC is the responsibility of the CoM EC. The October 2017 agreement does not stipulate any conditions for membership beyond "3 Votes from the Council of Mayors Executive Committee." <i>Potential action: The CoM EC should discuss representation at a future meeting(s).</i>
<u>Planning Liaisons 8/21/18:</u> Requested regular reports on the balance of redistributed funds.	Staff anticipates providing regular reports to the STP PSC, Council of Mayors, and others regarding programming and obligation of funds throughout the region. <i>Potential Action: Specific procedures for tracking and reporting will be developed cooperatively with the PLs and other partners.</i>