

October 17, 2017

Ms. Teresa Favila
Assistant Deputy Director
California Transportation Commission
1120 N. St., Sacramento, CA

Dear Ms. Favila:

Thank-you for the opportunity to comment on the final draft guidelines for the Commission's SB1-funded Solutions for Congested Corridors program. You and all of the Commission staff have already incorporated a great deal of feedback, and the program is almost ready to go. There are a few areas where VTA staff do recommend some additional modifications.

Project Sponsor Eligibility

The guidelines currently state that "A regional transportation planning agency, or county transportation commission, or authority responsible for preparing a regional transportation improvement plan under Section 14527 of the Government Code or Caltrans may nominate projects for funding". The commission should consider including agencies that produce long-range, multimodal transportation plans as eligible sponsors.

Leveraging Funds

The CTC should consider allowing use of RTIP funds as match. The State's congested corridors don't confine themselves to areas where project sponsors have available resources outside the STIP. An agency's willingness to propose RTIP funds should be seen as evidence of local commitment.

Similar to the Trade Corridors Enhancements Program, the CTC should also consider including the 2017 and 2018 Federal INFRA program as one of the competitive programs from which the Commission will consider uncommitted funds. The INFRA program encourages managed lanes and toll facilities without freight connections. These project types are currently ineligible in the SB1 Trade Corridors Enhancements program.

Program Management

California's project delivery environment is extremely complex. The CTC's award and allocation policies needs to reflect that, without the side effect of making the CTC extension process the path of least resistance when a project sponsor runs into trouble. The allocation process and the award process are independent of each other. Each requires a separate opportunity for one CTC-approved extension.

- Allocation risks come from complications in completing each of the many actions required for an allocation request. Almost all major capital projects require approvals from independent agencies who have no stake in timely performance, and suffer no consequences from delays.

- Award risks come primarily from the bidding process, which cannot be initiated before the Commission's allocation vote. Public sector bidding processes are lengthy, and necessarily so to allow for minimum solicitation times, responses to questions, and considered responses to disputes. Challenges come near the end of the process, when competitors protest the selection, or the agency finds itself in a re-bid situation due to excessively high bids, non-responsive proposals, or simple lack thereof. Many award extension requests could be prevented by using a slightly longer award deadline in the first place – such as 9 to 12 months

Many thanks for the opportunity to comment on the final draft guidelines. I look forward to working with the CTC to deliver congestion relief through the Solutions for Congested Corridors program.

Sincerely,



Marcella Rensi

Deputy Director, Programming & Congestion Management