

June 24, 2022

File Number 1500000

Mr. Mitch Weiss
Executive Director
California Transportation Commission
Mitchell.Weiss@catc.ca.gov

Dear Mr. Weiss:

Subject: 2022 Transportation Corridor Enhancement Program Draft Guidelines

The San Diego Association of Governments (SANDAG) appreciates the opportunity to provide comments regarding the 2022 Transportation Corridor Enhancement Program (TCEP) Draft Guidelines.

The TCEP was created to fund freight infrastructure improvements on federally designated trade corridors of national and regional significance. The TCEP serves as an important resource to help maximize local investments, and SANDAG looks forward to continuing to partner with the California Transportation Commission (CTC) on development and implementation of TCEP-funded projects for the San Diego region.

SANDAG would like to offer the following suggestions as it relates to the draft guidelines.

Distribution

SANDAG supports the proposed programming targets and Commission staff's willingness to consider all stakeholder needs. Commission staff led a workgroup of multiple experts from throughout the state to develop the target methodology. SANDAG appreciates the opportunity to have been part of those discussions and welcomes participation in future discussions in support of a corridor-based programming approach and geographic balance for the overall program.

Matching Requirements

SANDAG appreciates that the proposed guidelines indicate that no match will be required for the statewide (Caltrans 40 percent) funds requested. SANDAG also appreciates that if the initial funding request is broken into separate projects due to project segmenting, the local match for the TCEP funds will be recalculated. This approach continues providing the flexibility needed to allow regional agencies to maximize their participation in the TCEP while providing flexibility based on specific project needs.

Leveraging Federal Discretionary Funds

SANDAG appreciates that advance funds will be considered when an applicant could use TCEP funds as a non-federal match in a federal grant application. This approach helps to increase a project's competitiveness while ensuring projects proposed for advance funding demonstrate a significant freight benefit as defined in the guidelines.

Eligible Projects

SANDAG supports that the draft guidelines allow TCEP funds to be used for the plans, specifications, and estimates; right-of-way; and construction phases. SANDAG also supports that funding for eligible projects includes installation of broadband where appropriate and projects that support multiple objectives that align with the state's climate and equity goals.

Evaluation Criteria

SANDAG supports the inclusion of accessibility and community engagement criteria for historically impacted and marginalized communities. These policies along with the addition of Title VI requirements, are in alignment with SANDAG regional priorities and help further equity in the transportation planning process.

Timely Use of Funds

SANDAG supports that the guidelines include the ability to request additional time after allocation for project delivery. In particular, SANDAG appreciates that extensions of up to 20 months may be requested under extraordinary circumstances. Given the increasing complexities associated with delivering large projects within timely use of funds provisions due to unexpected circumstances, as well as anticipated delay challenges associated with new Buy America and Project Labor Agreement requirements, SANDAG supports maximum flexibility in administering these important requirements to continually ensure successful project delivery efforts.

Project Cost Savings

SANDAG appreciates that the guidelines allow for TCEP savings to fund cost increases in any project phase. Given current inflationary pressure being experienced across the state and nation, fully-funding significant capital projects is becoming increasingly challenging. SANDAG appreciates the flexibility the guidelines propose and encourages additional discussion to ensure continued successful project delivery in partnership with the CTC.

Sincerely,



HASAN IKHRATA
Chief Executive Officer

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cc: Lee Ann Eager, CTC Chair
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