

June 24, 2022

File Number 1500000

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

Dear Mr. Weiss:

Subject: 2022 Solutions for Congested Corridors Program Draft Guidelines

The San Diego Association of Governments (SANDAG) appreciates the opportunity to provide comments regarding the 2022 Solutions for Congested Corridors Program (SCCP) Draft Guidelines.

The SCCP was created to advance projects that implement improvements to reduce congestion and achieve greenhouse gas reduction targets consistent with a region's Sustainable Communities Strategy. The SCCP 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 SCCP-funded projects for the San Diego region.

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

#### Comprehensive Multimodal Corridor Plans

SANDAG and Caltrans District 11 have a comprehensive and collaborative planning approach. SANDAG supports the CTC's proposal to require Comprehensive Multimodal Corridor Plans (CMCPs) beginning with the 2022 Program. CMCPs serve to promote a planning process that utilizes a holistic and multimodal approach to achieve a balanced transportation system consistent with the intent of SB1. The 2022 SCCP Self-Certification Form required under the 2022 SCCP Guidelines will ensure plans are prepared in accordance with SCCP Guidelines.

#### Matching Requirements

SANDAG appreciates that the proposed guidelines continue to indicate that funding leverage is desirable and will be considered in the evaluation of projects. This approach continues providing the flexibility needed to allow regional agencies to maximize their participation in the SCCP while incentivizing the use of leveraged funds. While the 2022 SCCP Guidelines do not consider advance SCCP funds, as the TCEP guidelines permit as a non-federal match in federal grant applications, SANDAG would support allowing advance SCCP funds, which would help

to increase a project's competitiveness while ensuring projects proposed for advance funding demonstrate congestion relief and greenhouse gas reduction benefits as defined in the guidelines.

### Funding Restrictions

SANDAG supports limiting the use of SCCP funds to the construction phase of a capital project included in a CMCP; projects in an adopted regional transportation plan; and projects ready to start construction by December 2025; however, SANDAG also encourages the CTC to include the environmental, right-of-way, and design phases in future cycles as a fundable component of work. While eligible projects are ready to break ground, including pre-construction components in subsequent cycles would help position other projects for future funding and support continued success of the SCCP. In addition, SANDAG encourages the CTC to consider using program savings or allowing for supplemental funds requests to fund cost increases to award projects due to current inflationary pressure, for example, as currently permitted under the TCEP guidelines.

### Eligible Projects

SANDAG appreciates that the draft guidelines encourage projects that identify and incorporate the installation of conduit and/or fiber where appropriate and feasible in strategic corridors; shared mobility projects that create alternatives to auto use, and dedicated bus-on-shoulder facilities that allow for safety and operational efficiency. SANDAG also appreciates that the draft guidelines do not limit eligible project types to those that are listed but are clear regarding ineligible types of work such as general-purpose lanes. The identified eligible projects effectively reflect the goal of reducing congestion in highly congested corridors through a balanced approach that takes community needs and impacts into consideration.

### Environmental Process

SANDAG appreciates that the draft guidelines call for environmental clearance within six months of program adoption. Allowing projects to achieve environmental clearance after program adoption provides the flexibility needed to allow regional agencies to maximize their participation in the SCCP while ensuring projects selected for funding help expedite project delivery.

### Delivery Methods

SANDAG supports the continued inclusion of design as an eligible component for funding when using the design-build or Construction Manager/ General Contractor (CM/GC) delivery methods. This provision encourages the use of innovative delivery methods that typically result in cost savings and other project development benefits. In addition, SANDAG encourages the CTC to consider other project delivery methods. Including innovative methods such as Public-Private-Partnerships (P3), progressive design-build, or other delivery methods, helps to ensure agencies have the maximum flexibility in expediting project delivery.

### Project Rating Process/Evaluation Criteria/Title VI Requirements

SANDAG supports the prioritization of jointly nominated projects; projects that advance the state's climate goals and employ multimodal and/or innovative solutions; and projects that leverage funding from other discretionary fund sources. SANDAG also supports the inclusion of accessibility and community engagement criteria for historically impacted and marginalized communities, and the inclusion of climate change and pro-housing principles. 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.

Environmental Justice Communities

SANDAG appreciates the ability to continue utilizing a regional definition for disadvantaged communities to describe how the proposed project will identify community-identified needs. Providing this type of flexibility encourages applicants to submit projects that provide meaningful and assured benefits to the communities that need it most in their respective regions.

Sincerely,



HASAN IKHRATA  
Chief Executive Officer

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cc: Lee Ann Eager, CTC Chair  
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