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December 2, 2019

Ms. Fran Inman Chair California Transportation Commission 1120 N Street, MS-52 Sacramento, CA 95814

RE: Draft 2020 Solutions for Congested Corridors Program Guidelines

Dear Chair Inman,

We would like to thank the Commission for the Draft 2020 Solutions for Congested Corridors Program Guidelines. This program is particularly meaningful to Los Angeles County, as our residents and travelers disproportionately grapple with congestion daily; Los Angeles County experiences 47% of the state's annual vehicle hours of delay. We are grateful to have the opportunity to comment on the draft guidelines. We largely support the draft language and have additional recommendations we ask the Commission to consider.

Firstly, we appreciate the effort that has gone into honing and refining the performance metrics to identify measures that are more inclusive of multimodal projects. We are pleased that Commission Staff has maintained the assessment of the severity of the congestion as well as the congestion relief from the proposed projects as their primary evaluation criteria. Doing so will help ensure projects being considered for funding are most congruent with the legislative intent of this program and the program objectives to fund those projects in highly traveled, highly congested corridors. The diverse set of project evaluation criteria and performance measures dictate that competitive projects be transformative and deliver significant benefits.

The current draft guidelines allow for small projects and small project components' environmental clearance to be completed within six months of program adoption. Recognizing that large, transformative projects are inherently complex, we recommend expanding this flexibility to all projects. This will allow all projects to get through the environmental process, while still completing this milestone well in advance of project allocations. As funding capacity for the program is in the last two fiscal years of the three-year program cycle, FY22 and FY23, this flexibility presents little risk to the Commission.

Additionally, we ask the Commission to adjust the proposed geographic equity language in Section 7 "Funding Restrictions" of the guidelines as follows:

"Consistent with Section 15 of the Guidelines, it is the Commission's intent to fund multiple projects throughout the state, with at least one project in a county with a population of 500,000 or less."

The purpose of this adjustment is to allow geographic equity within an overall approach that ensures adherence to the goals of statute.

Once again, we appreciate the effort that has been made on these guidelines to-date, and ask that you consider these recommendations for inclusion in the final draft.

Sincerely,

James de la Loza Chief Planning Officer

CC:

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