

June 3, 2024

Docket Management Facility
U.S. Department of Transportation
1200 New Jersey Avenue SE
West Building, Room W12-140,
Washington, DC 20590-0001

RE: FTA-2021-0010 Capital Investment Grant Policy Guidance Update

To Whom it May Concern:

The Community Streetcar Coalition consists of over seventy local governments, transit agencies, architectural and engineering firms, rail car manufacturers, advocacy groups, community coalitions, and other private sector entities. Several members have participated in the Capital Investment Program previously, while others are planning to submit projects in the future. Consequently, the Coalition has come together to provide feedback to the FTA regarding the latest updates to the policy guidance.

Overall, the Coalition views the changes positively and has chosen to focus on five main areas of interest:

1. Changes in breakpoints for environmental benefits;
2. Updates to cost effectiveness breakpoints;
3. The impact of supportive zoning;
4. Two additional land use measures; and
5. The rating process for project bundles

Attached is a table containing the Coalition's comments. In addition to these policy guidance updates; the Coalition wishes to highlight two other ongoing concerns:

1. The limit on federal grant funds for Small Starts grants; and
2. The use of local contingency funding

While the limits on federal grant funds are established by statute and not by policy, the Coalition wants to express its desire for FTA and lawmakers to remove the cap on the federal share for Small Starts grants.

Regarding the second issue, the Coalition sees the use of federal contingency funding as a policy that should be reconsidered in the next round of updates. The current draw down of federal contingency funding incentivizes project sponsors to increase project costs in order to realize every dollar of federal funding approved in the grant agreement. We propose that project sponsors should be rewarded for effective project management and FTA should incentivize project sponsors to keep costs low, while also realizing all federal grant dollars. We propose FTA consider prioritizing the use of all federal grant funds for the base project cost and allow contingency to be solely funded by local and/or state dollars. The Coalition believes this would encourage project sponsors to keep costs low and result in additional local dollars which could be spent on future transit projects.

Thank you for considering these comments. For further information or questions, please contact Coalition Staff at christy@streetcarcoalition.org.

Sincerely,

Christy D. Willhite



Christy Willhite, Executive Director
Community Streetcar Coalition

Dan Bower, Chair
Portland Streetcar, Inc.

FTA-2021-0010 Capital Investment Grant Policy Guidance Update Response

PROPOSED CHANGES	COMMENT
Additional Questions Posed by FTA	
The Community Streetcar Coalition has no comments to the additional questions posed by FTA	
Eligible CIG Applicants, Projects, Costs	
The Community Streetcar Coalition has no comments to the changes proposed in this section	
Getting Into and Through Steps in CIG Process	
The Community Streetcar Coalition has no comments to the changes proposed in this section	
Evaluation Criteria and Rating Process – Project Justification	
<i>Land Use</i>	
Proposing to add two measures:	
1) Community Risk	We would like to express our concern with the use of a tool that measures Community Risk using Census Tract-level information. Due to the shorter nature of Streetcar projects, should a project lie entirely within one Census Tract, the ability of the project to address the Community Risks identified may be artificially limited. Among other benefits, streetcar projects serve as critical first and last mile connectivity for millions of transit users around the country, increasing the walkshed by as much as three-fold. We would recommend including the Census tract information at least 1/3 mile from the project.
2) Essential Services within one mile of stations.	In testing the proposed tool, we found several inaccuracies in both the stated location of the proposed essential services as well as the current status of the service (i.e.: whether or not it is currently in business). Additionally, we recommend that a weighting or adjustment be made to ensure that a pharmacy would not receive the same weighting as a regional medical center. We recommend that the radius used for this measure align with the other measures – a ½ mile non-overlapping buffer. This will ease data analysis and reporting.
<i>Cost Effectiveness</i>	
Revised breakpoints to account for reduced ridership and increased costs (Note cost numerator is annualized capital cost of all capital cost)	We applaud FTA for revising the breakpoints for the Cost Effectiveness measure. We would like to reinforce the current requirement that FTA maintain updates to Policy Guidance every 2 years. We recommend that the breakpoints for Cost Effectiveness also be updated every two years. We recommend that FTA utilize the Construction Cost Index to update the Cost Effectiveness breakpoints and not broader cost indices.
<i>Environmental Benefits</i>	
FTA is proposing to update the standard factors used to calculate the other measures within the environmental benefits criterion based on updated or newly available data. This applies to air quality, energy use, greenhouse gas emissions and safety factors	While we applaud FTA for updating the factors used to calculate air quality, GHG emissions, energy use and safety benefits, we urge FTA to release a way to test these updates and better understand their effect on projects. We recommend that FTA maintain the current medium rating threshold floor at 0%, while the upper limit should be the proposed 49.9%. We believe that projects that do not provide a dis-benefit to environmental measures (i.e.: no or positive % change) should still achieve a medium rating.
<i>Economic Development</i>	
Three total measures; equally weighted	The Community Streetcar Coalition supports the proposed changes to the weighting of the Economic Development measures. We support the change in the currently posted guidance to make supportive zoning in station areas a standalone subfactor. We support the intent of this addition but would like to ensure that intentionally supportive land use policy actions (non-zoning actions) that functionally serve as zoning interventions will be sufficiently credited. "Zoning and Supportive Land Use Policy Actions" would be a better acknowledgement of these potential



FTA-2021-0010 Capital Investment Grant Policy Guidance Update Response

	transit supportive land use and zoning actions. As an example, in Kansas City they approved an Overlay District along the Main Street Extension CIG New Starts Project that identified nodes around transit stations and allowed by-right height increases to 10 stories, parking modification, etc. in identified transit supportive zones. This approved policy overlay did not formally adjust zoning but was more holistic in providing a land use policy environment that is transit supportive and in many ways is a more effective policy tool, as it can layer policies over an entire district or alignment versus zoning changes to individual parcels. Land use interventions such as "Overlay Districts and Overly Zones" and other land use police interventions that have the net effect of modifying zoning, density, and parking requirements to be transit supportive absolutely should be recognized and credited as "supportive zoning in station areas" if zoning is to be called out as a standalone subfactor.
<i>Mobility Improvements</i>	
The Community Streetcar Coalition has no comments to the changes proposed in this section	
Evaluation Criteria and Rating Process – Local Financial Commitment	
The Community Streetcar Coalition has no comments to the changes proposed in this section	
Project Justification Warrants	
The Community Streetcar Coalition has no comments to the changes proposed in this section	
Bundles of CIG Projects	
FTA provides additional language around how the bundle will create overall efficiencies of cost and schedule as well as increasing the capacity of the total transportation system	We support the idea that a bundle is intended to create overall efficiencies. We recommend clarifying that the measure of capacity is to focus on increasing system ridership while enhancing benefits defined in the revised project justification criteria.
FTA continues to require each project within a bundle advance through the CIG project and financial justification rating process individually	We recommend that, in the next surface transportation reauthorization, that FTA be enabled to review an immediate bundle as a singular project against the CIG rating criteria.

