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April 1, 2011

The Honorable Barbara Boxer
Chair, Committee on Environment
and Public Works
United States Senate
112 Hart Senate Office Building
Washington, D.C. 20510

Thank you for inviting me to speak before the hearing of your Committee on Environment and Public Works on April 6, 2011, entitled "State and Local Perspectives on Transportation." As requested, I am providing this written testimony, which will be entered into the record. On April 6, I will verbally summarize my testimony. As Director of the California Department of Transportation, I appreciate the opportunity to testify on behalf of Governor Jerry Brown and the citizens of California.

In February, I spoke at a joint hearing of this Committee and the House Committee on Transportation and Infrastructure. At that hearing, Chairwoman Boxer and Chairman Mica invited us to provide specific recommendations regarding the reauthorization of the Surface Transportation Act, which we did. Today, I want to provide you with a broader sense of the transportation issues facing our state – the most populous in the nation and the eighth largest economy in the world.

Our economy depends heavily upon an efficient, well maintained transportation system. It carries the goods, people and services that, in turn, power California – and America's – prosperity. Transportation's importance to California and to the nation cannot be overstated.

California has invested heavily at the state and local level in our transportation system. Californians have invested billions of dollars to maintain and expand our transportation infrastructure. Over the past decade, more than $40 billion in additional state funds have been authorized for transportation, including state and local roadway improvements and high speed rail.

Statewide, voters approved Propositions 1A and 1B for a combined $30 billion in transportation bonds. Another $1.5 billion in annual revenues derived from the state sales tax on gasoline were dedicated to transportation, beginning in 2003. These actions demonstrate the commitment of the state to improving its transportation infrastructure. California is also using innovative delivery and funding approaches, such as public-private partnerships and design-build, to find more cost-effective ways to deliver transportation improvements.

In addition, at the local level, voters in counties have approved local sales tax measures that together generate over $4 billion annually. These successful measures demonstrated that voters recognize the need for transportation improvements; and - if the measures are tied to specific projects and schedules - are willing to provide revenues for that purpose. Local tax-measure projects can provide many opportunities to leverage federal funds and expedite delivery through an expanded TIFIA program.

Collectively, and with additional funding made possible through ARRA, these efforts are responsible for benefits that ripple throughout the economies of every other state in the nation. More than 40 percent of containers moving into and out of America use California's highways, railroads, ports, and airports. With 12 percent of the nation's population, California is responsible for almost 14 percent of the nation's Gross Domestic Product.

Looking ahead, how can we address the infrastructure needs of California, and the nation? We all know the Highway Trust Fund isn't keeping up with needs. In California, we have analyzed the funding needed over the next 10 years to preserve our transportation

infrastructure. Just to maintain and rehabilitate our existing highway infrastructure will require an additional $74 billion, yet we anticipate there will be just $18 billion available to meet that need. For local streets and roads, the shortfall is projected to be $78.9 billion. And for the same 10-year period, the unmet transit preservation need is $14.4 billion. Clearly, traditional approaches will not be successful in meeting future needs.

Reauthorization needs to ensure the financial integrity of the Highway and Transit Trust Funds. The financial integrity of the transportation trust fund is at a crossroads. Current user fees are not keeping pace with needs or even the authorized levels in current law. The current revenue stream will not provide the revenue or stability needed, especially as new fuels enter the marketplace. The result of starts and stops in funding availability is inefficient project delivery, and wasted time and money. The next authorization will need to **stabilize** revenues and prepare the way for the transition to new methods of funding our nation's transportation infrastructure, such as the flexibility to use creative financing tools.

We need to rebuild and maintain our transportation infrastructure in a good state of repair. Conditions on California's (and the nation's) surface transportation systems are deteriorating while demand is increasing. We maintain and operate a highway system that was largely built over 50 years ago, when the traffic volumes we see today were never imagined. Funding policies at the federal, state, and local levels tend to understate the life-cycle costs of transportation infrastructure and must be revised . These combined factors of deteriorating systems, increasing demand, and inadequate funding policies adversely affect the operational efficiency of our key transportation assets, hindering mobility, commerce, quality of life and the environment.

Our economic health demands that we establish goods movement as a national economic priority. Interstate commerce is the historic cornerstone defining the federal role in transportation. The efficient movement of goods across state and international boundaries

increases the nation's ability to remain globally competitive and generate jobs. You can help by creating a new federal program and funding sources dedicated to relieving growing congestion at America's global gateways. This congestion is acting as a trade barrier and creating environmental hot spots.

Our urban areas need enhanced mobility through congestion relief within and between metropolitan areas. California is home to six of the 25 most congested metropolitan areas in the nation. These mega-regions represent a large majority of the population affected by travel delay and exposure to air pollutants. These urban areas are contributing to the funding of transportation through local sales tax measures. We ask that you develop incentives for those regions that are raising their own transportation dollars, perhaps by expanding the TIFIA loan program.

The next authorization has the opportunity to streamline project delivery. Lengthy processing times for environmental clearances, federal permits and reviews add to the cost of projects and delay needed mobility improvements for the traveling public. Given constrained resources, it is all the more critical that these clearances and reviews be kept to the minimum possible, consistent with good stewardship of natural resources.

I'd like to point out that California was the only state to fully implement the National Environmental Policy Act (NEPA) delegation pilot program authorized in SAFETEA-LU, which California began using in

2007. Through this program, Caltrans has assumed most federal responsibilities for environmental documents and now completes routine NEPA documents about 14 months earlier than before. Overall project delivery timeframes have improved as well. California recommends that this successful pilot be made permanent.

You can consolidate federal programs to improve efficiency and provide flexibility. The Administration's surface reauthorization proposal suggests consolidating 55 highway programs into five "core programs," along with other program consolidations in other areas. If this includes giving the states flexibility in making funding decisions that are appropriate for them, it is a good start to providing the flexibility we need.
We are looking for a continued, stable, and reliable long-term investment strategy from Washington that can support the transportation infrastructure necessary to continue our nation's economic supremacy. No other action by Congress could serve transportation as well, create as many jobs, or build badly needed infrastructure as effectively as that action.

We will continue working with our federal partners at FHWA, as well as our local transportation partners, to meet California's transportation needs. These partnerships have been critical to our success.

I'm grateful for the time you are taking to consider California's perspective on the transportation issues we are all facing, and I look forward to working with you in the future. Listed below are specific recommendations regarding the reauthorization of the Surface Transportation Act.

We have prepared specific recommendations in the following areas:

- Ensure the financial integrity of the Highway and Transit Trust Funds.
- Rebuild and maintain our transportation infrastructure.
- Make goods movement a national priority.
- Reduce congestion in metropolitan areas.
- Streamline project delivery and extend California's NEPA delegation.
- Consolidate federal programs.

As you can see from the volume of comments, we take seriously the need for specific recommendations for the next reauthorization. As an example, we consider it essential that the federal delegation of NEPA authority become permanent, or at least be extended. In lieu of proposing additional revenue generating mechanisms such as changes to the gas tax, we have included alternative funding recommendations.

My staff and I are ready to respond to any questions you may have on these recommendations. Please contact Mr. Brad Mettam at the above address, by telephone at (916) 654-2936 or by email at brad.mettam@dot.ca.gov if you or your staff need any additional information.

Sincerely,

CINDY McKIM
Director

Recommendations for the Surface Transportation Reauthorization Bill

Ensure the financial integrity of the Highway and Transit Trust Funds

Proposed Change	*Examples of how this would be of use..*
Increase the amount available under the TIFIA program.	The TIFIA program has provided loan guarantees to a limited number of projects, restricted primarily by the cap on the amount available.
Allow privatization of Safety Roadside Rest Areas, Park and Ride lots, and other facilities.	Public-private partnerships are needed to help deliver essential services to the traveling public.
Provide federal authority to impose tolling as a revenue stream.	States need every available revenue source to leverage state and federal funds for capacity increasing projects and other purposes.
Authorize a bond funding program, similar to *Build America Bonds (BABs).*	BABs provide states with an option to access the corporate taxable bond market, which is broader and deeper than the tax-exempt market.

Rebuild and maintain our transportation infrastructure

Proposed Change	*Examples of how this would be of use..*
Make some or all additional "stimulus" funding "ministerial" rather than "discretionary", eliminating the need to comply with NEPA and other requirements.	This would allow the rapid construction funding of existing state and local projects without having to go through Federal processes. Projects would still have to comply with state and local requirements, and all health and resource protection Federal requirements, such as the Clean Water Act and the Endangered Species Act.

Make goods movement a national priority

Proposed Change	*Examples of how this would be of use..*
Incorporate a measurement of each state's contribution to national goods movement goals as part of the federal distribution formula.	Goods movement on highways in states that act as primary goods movement conduits contributes significantly to the deterioration of the highways and the congestion around ports of entry. These states

	provide a service to the national economy at a cost in facility maintenance, repair, and replacement.
Develop competitive fund for high-priority national goods movement projects.	Existing funding mechanisms need to be revised to reflect the significance of freight movement on a national basis. Project improvements for goods movement have a positive impact on the corridor being improved as well as on a system wide basis. This would provide a mechanism to ensure that freight projects receive a higher priority and funding levels that would enhance the movement of people, goods, information and services. A national formula could be developed for programming projects and receiving resources from multiple funding sources i.e. Priority Index Number and utilize consistent cost/benefit criteria.
Include port planning in the current criteria for existing planning grants to allow for funding of Port-to-Corridor Management Plans (P2CMPs).	The funding of P2CMPs will allow local, state, federal and private sectors to coordinate and develop these plans to identify and fund projects along these P2CMPs to deliver projects, similar to California's CSMPs. In California, the four main P2CMPs are Los Angeles-Long Beach/Inland Empire, Bay Area, San Diego/Border and the Central Valley.

Reduce congestion in metropolitan areas

Proposed Change	*Examples of how this would be of use..*
Provide incentives for metropolitan congestion pricing.	Encourage the application of congestion pricing in the nation's most congested metropolitan areas by providing funding incentives.
Change 23 USC 135 Section 135(d)(1)(E) to add to this planning factor "the integration of land use and transportation, including consistency with development patterns."	This would allow states and regions more flexibility to support and provide incentives for integrated land use, transportation and housing planning that utilize the latest travel forecast data, along with the latest modeling tools, and that identify alternative/preferred scenarios that reduce congestion within and between metropolitan areas. The State of California has implemented its statewide California Interregional Blueprint, and six of the 25 largest metropolitan areas in the nation have participated in Regional Blueprint Planning efforts that consider land use and transportation while evaluating travel within and between metropolitan areas. These Blueprint programs promote the linking of

	transportation, land use and housing through the development of visions for future growth based on the latest modeling tools that identify alternative/preferred scenarios that reduce congestion within and between metropolitan areas.

Streamline project delivery and extend California's NEPA delegation

Proposed Change	*Examples of how this would be of use..*
Allow states to have permanent NEPA delegation after successful completion of pilot program and include Section 6005 Air Quality Conformity Determinations.	This would allow California, and other states in the future, to assume permanent NEPA delegation. It would permanently remove redundant reviews by both Federal Highways Administration and Caltrans. FHWA retained Air Quality Determinations under SAFETEA-LU Section 6005, but not under Section 6004. Further delegation of Air Quality Conformity determinations streamline approval of documents under Section 6005.
Allow the use of the TEA conformity exemption for historic railroad structures.	The law and EPA's conformity regulations currently exempt most TEA projects from conformity requirements, but explicitly prohibit use of the exemption for TEA projects affecting historic railroad structures. Historic issues with railroad structures should be dealt with through the standard 106 and 4(f) processes, and not through a conformity exemption, unless the project would in fact not be neutral for air quality purposes.
Make TEA more flexible.	Expand the TEA category for wildlife passage to include fish passage.
If a proposed project is included in the air quality conformity determination for a Regional Transportation Plan, no further action should be required to meet the requirements of the Clean Air Act of 1990.	Regional Metropolitan Planning Organizations are required to provide analysis on air quality conformity as part of the approval process for their Regional Transportation Plan. Because air quality conformity is best addressed at regional levels, it is a duplication of effort and ineffective for projects to require additional conformity determinations.
Allow NEPA approval if the final quality conformity determination is made before project construction.	This would allow final design to continue while additional conformity requirements are completed. Since final approval for construction could not occur during a lapse, this change would not result in any actual impacts to air quality conformity.
Remove funding plan barriers to NEPA	Allow projects to continue through NEPA approval

approval.	even if a Long Range Plan is temporarily no longer financially constrained due to the current volatile economic situation. This could be done by allowing NEPA approvals while Long Range Plans are being amended, as long as the project is proposed to remain in the amended Plan. This would avoid the delays in project delivery when world or national economic situations temporarily affect transportation funding.
Allow a state's environmental document to be adopted by the federal lead agency for purposes of NEPA compliance, if a state's environmental review has been completed prior to federalization of a proposed project.	The State of California has implemented legislation that duplicates NEPA and applies even more stringent requirements, i.e. CEQA defines a significant impact as one for which a "fair argument" can be made. Other states have similar state environmental laws. Allowing the federal lead to adopt the "mini-NEPA" document rather than preparing and approving a separate NEPA document would avoid duplication of effort. The adoption could be similar in form to a re-evaluation and would not require public circulation.
New projects located within an area which had previously completed NEPA clearances should be exempt from further NEPA and associated Federal environmental legislation reviews, if no new right-of-way is required for the construction of these projects.	If a state DOT purchased right-of way under federal authorization, new projects located within that right-of-way should not result in additional impacts to the environment. For example, if a DOT purchased a new freeway alignment with a 100 foot median, then decided to widen in the median, it would not be required to mitigate again for "habitat" if endangered species utilized that land in the future. This would include making existing right-of-way exempt from consideration as "habitat" under the Endangered Species Act. Currently, endangered species such as San Joaquin Kit Fox, Desert Tortoise, and Tipton Kangaroo Rats often utilize the medians and shoulders of busy highways as foraging habitat. While this habitat is marginal at best, the law as currently interpreted requires that agencies purchase replacement habitat for these impacts. This modification would hold agencies free from retribution for incidental harm caused by routine maintenance and construction within existing right-of-way.
Allow at-risk detailed design prior to NEPA completion	During the NEPA process, a Preferred Alternative may be identified in the Draft Environmental Impact

	Statement (EIS). Current federal regulations do not allow the use of federal funds to begin "detailed design" prior to the Record of Decision, which results in unnecessary delay in the project delivery process. Section 6002 of SAFETEA-LU, Efficient Environmental Reviews for Project Decision making, provided some relief from these restrictions, but it still limits design to only those elements that relate to environmental issues, environmental mitigation, or environmental permits. Flexibility is needed so that the state DOTs may continue to move forward with the project development process in a timely fashion using both federal and non-federal funding – at their own financial risk – prior to the finalization of the NEPA process.
Allow advanced Right-of-Way acquisition	Advanced Right-of-Way Acquisition is intended to provide for the preservation of corridors for future roadway expansion. Corridor preservation's goal is to minimize development in areas that are likely to be required to meet transportation needs in the future. Current federal environmental restrictions make it extremely difficult to identify and preserve transportation corridors for the future. Corridors must be part of a fiscally-constrained Long-Range Plan in order to use corridor preservation funds. It is often difficult to get FHWA to participate in preparing an environmental document for a project that will be built 15 or 20 years in the future. Most of the right-of-way acquired now is for widening or expansion projects on existing facilities, as opposed to projects on new alignments. In these cases, the decision regarding the location of the transportation improvement has already been made – thus, there is almost zero chance of biasing the NEPA process. Typically that right-of-way acquisitions are "environmentally neutral" events – in other words, no damage is done to the environment as a result of simply purchasing a plot of land.
Eliminate or modify the Efficient Environmental Review Process that was established under Section 6002 of SAFETEA-LU.	SAFETEA-LU created a new Efficient Environmental Review Process (Section 6002). While the intent of the section to promote early coordination was admirable, the procedural requirements of Section 6002 are duplicative of

	already existing environmental processes. This duplication has lead to less efficiency and more confusion during the NEPA process. An alternate approach would be take make the Section 6002 process optional, rather than mandatory. If Section 6002 is kept, a subsection should be added to the process that bars a participating agency from raising substantive issues during the permitting process that it should have be aware and raised during the NEPA process.
Establish a priority for infrastructure projects at federal permitting agencies that includes firm deadlines.	A significant component of the time required to deliver a project is that needed to receive the many federal permits required. This requires a significant investment of resources, and erodes the value of available funds. Federal agencies should be given a firm, limited time to provide permits, and an automatic appeal process for transportation infrastructure projects should be instituted when permit reviews exceed that time that is external to the permitting agency.
Allow program-level reimbursement ability for state's oversight of local agency projects.	The stewardship agreement between FHWA and Caltrans delegates certain oversight responsibilities of the local agencies from FHWA to Caltrans. The Stewardship agreement also states that some of these oversight responsibilities cannot be further delegated to local agencies in California. The oversight of these local agency projects cost over $35 million to California which is not reimbursed by FHWA. This is a cost that California can no longer afford. Since local programs have been identified by FHWA as a "high risk", the expectation on the oversight has only been increasing. FHWA acknowledges, these cost to be eligible for reimbursement provided the cost is charged to individual projects. Since at any given time there are about 5000 locally administered projects, charging Caltrans' oversight to these projects is not feasible. We propose to allow states to collect reimbursements for oversight on a single project designated for oversight cost.
Revise the federal transparency reporting process.	Federal Funding Accountability and Transparency Act's Sub-award Reporting requires the State to report certain data after the end of each month on ALL federally funded projects.

	The California Department of Transportation (Caltrans) has completed three cycles of report. It has been burdensome and confusing at times to comply with this new federal reporting requirement. The data submitted has the potential to be incomplete or incorrect. We feel this reporting requirement can be met more efficiently if the sub-awardee information is included in FHWA's Financial Management Information System transactions. The States will report this data at the time of requesting authorization for projects (not after the authorization). This will ensure 100 percent completeness. The data received by FHWA will be uniform throughout the nation.
Properties under 100 years of age would be exempt from evaluation under section 106 of the Historic Preservation Act.	As America ages and construction techniques improve, a greater number of properties will reach the current age of 50 years without major modifications. Continuation of this standard would significant increase the time and expense for compliance with the Historic Preservation Act. By modifying the evaluation criteria from fifty to 100 years, you would move beyond an individual person's lifetime and into the realm of history. It would save both time and resources.
Eliminate duplicate evaluation of historic properties.	The law as currently written has duplication of effort. Historic properties are evaluated and protected under Section 106 of the Historic Preservation Act and require a redundant evaluation under Section 4(f) of the Department of Transportation Act.
Exempt routine maintenance and restoration projects from Section 106 of the Historic Preservation Act.	Projects which replace existing pavement (overlays, slab replacements) would be exempt from further analysis under Section 106 of the Historic Preservation Act. These projects result in minimal additional disturbance of "native soils." This modification would result in a reduction of time and effort on routine road maintenance.
States need the ability to do programmatic advance mitigation for natural resource impacts based on mutually approved modeling, rather than having to connect mitigation costs to already designated projects in federal plans.	By allowing states to develop and implement a statewide advance mitigation program, states could (a) reduce project delays, (b) reduce mitigation costs and (c) improve mitigation quality. Greater flexibility to do programmatic advance mitigation, rather than project specific, in the next authorization would facilitate this innovation.

Consolidate environmental mitigation negotiations.	Once NEPA is completed and a Biological Opinion issued by US Fish and Wildlife Service, any modifications to Endangered Species listings or refinements to project footprint would not require the issuance of a new Biological Opinion. FHWA or their designee via delegation would provide USFWS with an administrative amendment which would include additional provisions to address any modifications to the project. USFWS would not be required to perform any action, other than acknowledgement of the amendment. Any projects changes which require a supplemental NEPA document would not apply to this provision. US Fish and Wildlife Service negotiates a specific mitigation ratio based upon the quality of impacted habitat. At the time the Biological Opinion is issued, less than 30% of design work is completed. Often minor refinements will result in changes within the area of impacts, i.e. originally it was 5 acres and now it is 6.5 acres. This change in area would require that formal consultation with USFWS be reopened and a formal amendment to the Biological Opinion issued. As the NEPA lead agency, it is appropriate for FHWA or its designee to prepare an administrative amendment which modifies the impact area and increases the mitigation required to reflect the ratios agreed in the original Biological Opinion. This would save time and effort at both agencies and solidify the agreements made during the NEPA process.
Man made water conveyance systems should be exempt from consideration as "waters of the U.S."	Currently canals and ditches can be considered as "waters of the U.S." under section 404 of the Clean Water Act. Moving a concrete lined ditch could trigger the NEPA 404 process and result to greater impacts to historic and natural resource in an attempt to avoid impacts to these features. This change would reduce time and costs associated with project delivery.
Streamline the Federal Transportation Improvement Program (FTIP) Amendment process.	Current regulations require that many relatively minor changes to project cost, scope, or schedule require time consuming and paperwork-intensive amendments. This can occur as a result of relatively minor changes to project limits (as little as over a tenth of a mile), or changes in project cost (as little

	as $5 million, which is a small percentage of a large project). Expanded use of administrative amendments would save significant time and effort.
Change the period of the FTIP from four years to five.	Current regulation requires the FTIP/FSTIP to cover 4 years and be updated at least every four years (most states update every two years, to have a pool of programmed projects to draw on). If the period of the FTIP/FSTIP were increased to 5 years, with an update at least every four years, it would cut in half the workload of Metropolitan Planning Organizations and states for updates.
Adopt provisions that allow projects that are funded through multiple federal programs to use only the rules, restrictions and reporting requirements of the largest contributing program.	Individual project funding packages are sometimes made up of several different sources; each applied to the portion of the project that is appropriate for that source. Each source has its own set of rules, schedules, restrictions and reporting requirements that quickly complicate project delivery.
Provide clarification under Section 4(f) of the Department of Transportation Act that for public properties to be considered as a 4(f) property under recreational use, the primary function of the property must be recreation. This modification would specifically apply to portions of State and National Parks and Forests which are not primarily used for recreational activities.	Currently school playgrounds are often determined to be 4(f) properties because they allow public recreational activities during non-school operation. The use of schools for "recreational" activities is secondary to their primary function, but because of this use impacts to parking lots and other school properties is often deemed a 4(f) impact. In addition to this, our National Parks are served by highway systems. Often minor maintenance work, including rehabilitation can result in 4(f) impacts even when the only impact may be realignment of an existing driveway.
Current environmental policy includes "No net loss to wetlands". Allow for enhancement to existing wetlands to be counted as "mitigation" for impacts to wetlands.	If a project impacts a wetland of marginal quality, current mitigation would include acquisition of "credits" at a bank which has created wetlands by expansion of existing systems, or involve creation/expansion of wetlands at another location. This proposal would expand the potential to include "enhancement" activities to count towards wetland impacts more explicity. If you impacted an acre of wetlands you could restore 5 acres of poor quality to good quality via a management plan. This process would help improve the overall quality of existing wetlands and encourage DOTs to adopt management programs which Army Corps of Engineers could approve to gain "credits" towards future impacts.

Broaden and extend the option to use warranties in highway construction contracts.	Currently, federal regulations allow for warranties to cover specific *products* or *features* of a construction project (such as the pavement), but are not allowed to cover an entire project. Recently, as part of changes made to federal regulations to accommodate design-build contracting, the warranties section of the Code of Federal Regulations was amended to allow "general project" warranties on design-build projects on the National Highway System, which covers all parts of a construction project. In addition, projects developed under a public-private agreement may include warranties that are appropriate for the term of the contract or agreement, which could be many years. These allowances have not been made for traditional design-bid-build projects, which are still restricted, as noted above, to specific products or features. While general project warranties will likely not be used on all traditional design-bid-build projects, their use could encourage innovation in construction processes or the products that are used since the potential for failure would be covered by the warranty. Finally, even the general project warranties allowed for design-build projects are permitted only for short periods of time, or as the regulations state, "generally one or two years." Unfortunately, one to two years is not typically long enough to determine if a roadway or bridge structure has been built correctly. A more appropriate minimum length of time for a warranty would be in the range of 5 to 10 years.
Allow federal funds to be used for mitigation banking/advanced mitigation.	For example, TEA shares could be used to fund advanced mitigation and projects could reimburse those funds when capital funds are available. This change would allow for expedited permitting under existing laws/regulations and would provide immediate relief without requiring any changes to Federal funding levels.
Remove environmental and R/W requirements for any Non-infrastructure Projects	For example, the Safe Routes to School (SRTS) Program consists of infrastructure and non-infrastructure (NI) programs, and both programs are currently delivered using the process for typical construction projects. However, the NI Program is a program that provides for the education,

	encouragement, enforcement, and evaluation of SRTS programs in local communities. These types of activities are non-construction work that should not require NEPA clearance or right of way certification as currently required. Delivery of the NI program can be streamlined by handling it similar to FHWA State Planning and Research, Partnership Planning and FTA State Planning and Research Grants which are discretionary grants awarded through a grant application solicitation process similar to the SRTS-NI Program.
For projects under $3 million, use a one component process for issuing authorization to proceed.	This change would provide authorization for preliminary engineering, right-of-way, and construction in a single action. Because this would only apply to small projects, it would expedite the process and allow the projects to move between phases easily.

Consolidate federal programs

Proposed Change	*Examples of how this would be of use..*
California supports the consolidation of existing Federal Surface Transportation Programs to focus on ten programs as recommended by the National Surface Transportation and Revenue Study Commission (Commission). We also support increased flexibility for project eligibility and funds transferability among the ten programs and across different US DOT administrations using needs-based criteria.	There are currently 108 programs under 5 administrations. The Commission recommended consolidating into ten programs. Additional flexibility is also needed to allow projects under the ten programs be funded to achieve national objectives. The current system, to "flex" funds, between the modal administrations is cumbersome and often results in project delay. This process should be streamlined, so that funds can immediately be used for projects meeting required criteria. More flexibility is also needed to transfer funds among the 10 programs.