



September 30, 2024

The Honorable Carl Guardino
Chair, California Transportation Commission
1020 N Street
Sacramento, CA 95814

Re: Draft State Highway Operation and Protection Program Guidelines

Dear Chair Guardino,

On behalf of the Madera County Transportation Commission (MCTC), the Merced County Association of Governments (MCAG), and the Tulare County Association of Governments (TCAG), we write to express our collective support for the draft guidelines for the State Highway Operation and Protection Program (SHOPP) that California Transportation Commission (Commission) staff is currently ushering through the public process in preparation for Commission action later this year.

The SHOPP is an essential program that helps regions like ours deliver a safe, efficient, multimodal, and well-maintained state highway system (SHS) for our communities and the economic activities and services that utilize surface transportation infrastructure to move goods and people throughout the state. Overall, we find that the draft SHOPP guidelines make appropriate updates – both substantive and technical – that will allow regions like ours to work with the state to improve the SHS and meet performance targets for core assets.

In recognition of the unique characteristics of each region in the state, the SHOPP has taken a flexible approach that accounts for regional needs while still allowing the state to prioritize projects that help meet its asset management goals. We find the draft SHOPP guidelines retain this important flexibility. Further, the draft guidelines do not arbitrarily prohibit SHOPP projects from contributing to larger regional and SHS corridor goals. Specifically, we support retention of existing SHOPP policies that allow us to deliver projects using both SHOPP and other fund sources, including State Transportation Improvement Program (STIP) funds. Policies that allow agencies to deliver multiple goals, save taxpayers hundreds of millions of dollars, and reduce construction related impacts on the traveling public and workforce that risk their lives daily should be *encouraged*.

By way of example, the SR 99 Delano to Pixley project in Tulare County **saved approximately \$60-80 million** by combining a maintenance project with STIP dollars to convert temporary lanes to permanent lanes thereby closing one of the remaining gaps on the corridor. In Madera and Merced counties, there were missed opportunities in the past decade to combine maintenance and capital projects too. Caltrans just completed two SHOPP projects on SR 99 in Atwater and Merced that created temporary lanes that could have been converted into permanent lanes and close two more gaps in the system. This conversion **would have saved at least \$300 million**, prevented the

traveling public from having to endure another disruptive project, and reduced cumulative impacts of construction and use of materials.

Our organizations estimate that another \$250 million could be saved by using this strategy on future SR 99 gap closure projects. These costs savings ultimately help the state deliver additional projects – improving the condition of the SHS system and helping to achieve our multimodal, safety, climate, and economic goals in a more efficient and cost-effective manner. To be clear, under this strategy, no SHOPP dollars are used for any capacity or widening work but by building off a maintenance project, we can sequence other projects to save money, time, and improve quality of life in our communities more quickly.

For these reasons, we support the draft SHOPP guidelines. Should you have any questions regarding our feedback on the draft SHOPP guidelines, please contact Kiana Valentine who represents our agencies on SR 99 corridor matters (kiana@politicogroup.com or (916) 266-3892).

Sincerely,



Stacie Guzman
Executive Director
Merced County Association of Governments



Ted Smalley
Executive Director
Tulare County Association of Governments



Patricia Taylor
Executive Director
Madera County Transportation Commission