

Commission Background Paper 8B-01

FTA Process Pertaining to Major New Fixed Guideway Capital Project Development and Funding

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Introduction

This paper is part of a series of briefing papers to be prepared for the National Surface Transportation Policy and Revenue Study Commission authorized in Section 1909 of SAFETEA-LU. The papers are intended to synthesize the state-of-the-practice consensus on the issues that are relevant to the Commission's charge outlined in Section 1909, and will serve as background material in developing the analyses to be presented in the final report of the Commission.

This paper discusses the Federal Transit Administration's (FTA) processes for developing and funding major new fixed guideway capital projects. The process and findings in this paper do not apply to, nor do they reflect, the new "Small Starts" process, intended for smaller new transit capital projects – generally of \$250 million or less in cost.

Background and Key Findings

The information and findings presented in this paper are extracted from the *Annual Report on New Starts: Proposed Allocations of Funds for Fiscal Year 2007*, "Advancing Major Transit Investments through Planning and Project Development" dated January 2003, *Guidance on New Starts Policies and Procedures* dated May 16, 2006, and the *New Starts Program Assessment Interim Report* by Deloitte Consulting LLP dated August 18, 2006. This information and findings are based on project data available in November 2005. Key findings include:

- The New Starts project planning and development process is an intensive effort to systematically develop, evaluate and rate candidate projects in order that the most ready and worthy projects are recommended for the limited amount of Section 5309 New Starts funds.
- The project development process for a proposed New Start may take as little as 5 years from early planning studies to FFGA, or it may take as long as 20 years. The reasons for this disparity in time are many, and may include uncertainties in local political support for the project, environmental or financial issues, or even engineering issues that may only arise during the environmental or preliminary engineering phases.
- FTA is reviewing its project planning and development and oversight procedures to assure appropriate consideration of uncertainties, risks, and other issues, while expediting and/or streamlining the project review process to the extent practicable. Earlier FTA involvement in project planning is intended to minimize the necessity for project sponsors/grantees to redo project studies and analyses.
- The President's Budget for FY 2007 proposed \$1,466 million for the capital investment grant program (New Starts) under Section 5309. Of this total, \$1,229.48 million has been recommended for 16 existing, two pending, and five proposed Full Funding Grant

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Agreements (FFGA). Hence, 84 percent of the President's Budget for the New Starts program has been allocated to projects that have successfully completed the New Starts project development process or are anticipated to have completed the process prior to or during FY 2007.ⁱ

New Starts Project Planning and Development Process

The New Starts planning and project development process reflects a continuum of policy development, technical studies, and decision-making activities, and consists of three major phases: alternatives analysis (AA); preliminary engineering (PE); and final design (FD). Successful completion of this project planning and development culminates in execution of a Full Funding Grant Agreement (FFGA) for project construction.

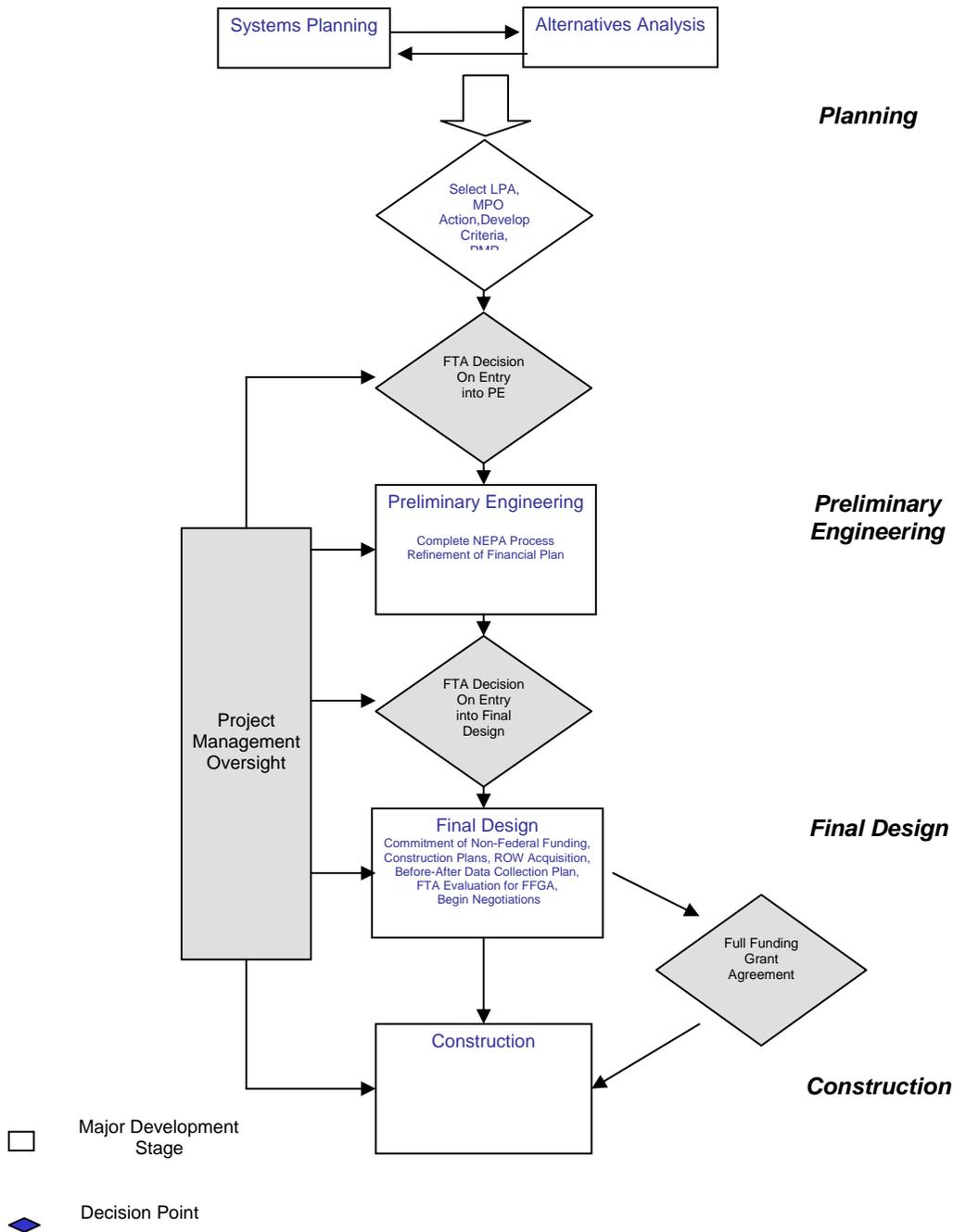
Section 5309 New Starts funds are discretionary, unlike other FTA capital grant programs. Accordingly, the planning and project development process plays a critical role in the shaping of these major transit capital investments and FTA's decisions to fund them via an FFGA. SAFETEA-LU requires that FTA approve the advancement of all projects pursuing Section 5309 New Starts funding into the preliminary engineering and final design phases of project development. The bases for these FTA project development approvals are the determination that candidate projects are indeed ready to advance into the next phase of development, and the evaluation of a candidate project's performance against the New Starts criteria (discussed later in this paper). Contrary to New Starts projects, capital projects developed under other FTA grant programs are only subject to the grants management (and reporting) process and do not require FTA approvals for their project development advancement. Although the same terminology may be used across FTA's capital programs to designate a project's development phase, only the New Starts program has specific conditions and requirements for each project development phase.

FTA notes that its intent is to add value throughout the process, rather than simply "injecting" itself in the project development process at the point of approving a project's entrance into preliminary engineering or final design. Accordingly, FTA provides responsive technical assistance and improved tools to help local stakeholders generate the information necessary to support effective local decision-making. FTA recognizes, and emphasizes, the importance of objective and defensible transportation planning and subsequent project development efforts to facilitate local decision-making and ongoing environmental, engineering, and design management, and its early and ongoing partnership with local agencies and stakeholders to assist in this process. Early FTA involvement minimizes the required expense of resources in the development of the information needed by FTA to provide project approvals.

In June 2006, FTA hired Deloitte Consulting to perform a detailed analysis of the New Starts program with particular focus on reviewing the project development process. FTA continues to move towards improving accountability, transparency and consistency of the New Starts program, a key finding of the Deloitte study. In May 2006, FTA issued Guidance on New Starts Policies and Procedures, which the study acknowledges has already addressed some of the key issues it has identified.

Figure 1 presents the New Starts Project Planning and Development Process. A brief discussion of the steps in this process is provided on the following pages.

Figure 1
New Starts Planning and Project Development Process



Alternatives Analysis

To be eligible for Section 5309 New Starts funding, candidate projects must have been proposed from an alternatives analysis (AA) that evaluates all reasonable modal and alignment options for

addressing mobility needs in a given corridor. AA may include the undertaking of a Draft Environmental Impact Statement (DEIS) required by the National Environmental Policy Act of 1969 (NEPA). The purpose of the AA is to identify and compare the costs, benefits, and impacts of an array of transportation alternatives as a means of providing local decision-makers with the information necessary to determine and implement the most appropriate transportation solutions in priority corridors. Broad consensus is reached on the type of improvement(s) that best meets the locally defined goals and objectives for the specific corridor. The alternatives considered are subject to various analyses of the pertinent issues in order to make an intelligent selection of a preferred transportation design concept and scope from the alternatives available.

Key elements of the alternatives analysis are: to describe the transportation problem in the corridor; to specify an evaluation framework for assessing the performance of potential alternatives that would address the problem; to define the alternatives to be considered; and then to evaluate the alternatives in terms of how they best meet local goals and objectives, and have the most realistic opportunity for funding. The outcome of this process is the selection of a “locally preferred alternative” which then is added to the Metropolitan Planning Organization’s fiscally constrained Long Range Plan.

Although FTA does not “approve” any aspect of the alternatives analysis, FTA requests the opportunity to review and comment upon specific elements of the study in order to: (1) assist local agencies in addressing technical and procedural issues early in the study process; (2) ensure that FTA requirements for AA are met; and (3) gain sufficient understanding of the resulting project to support any FTA decision to advance it into PE. This is particularly helpful in the selection of the New Starts baseline alternative, which requires FTA acceptance and is used as the basis for subsequent New Starts evaluations and ratings. FTA now uses its Project Management Oversight (PMO) program during AA to obtain critical feedback about project scope, feasibility, budget, and scheduling to allow early recognition of potential problems in project planning and development. Early identification allows these problems to be addressed at minimal cost of time and other resources. Schedules and costs for conducting an alternatives analysis study vary widely, from one or two years to up to five years or more. The time required to perform project planning is essentially a local matter, depending on the complexity of the corridor and its travel patterns, the availability of models and data, the number of alternatives being studied, the sensitivity of potential environmental impacts, the scale of the public involvement process, local technical capabilities, and the willingness and capacity of participating local agencies to devote the necessary staffing and financial resources. The required planning analyses provide the necessary information to stakeholders and decision-makers to select a locally preferred alternative for further engineering and design.

Preliminary Engineering

Upon completion of alternatives analysis, the project sponsor must obtain FTA approval for entry into preliminary engineering (PE). During the PE phase of project development, local project sponsors refine the design of the locally preferred alternative to the extent necessary to complete the NEPA process, taking into consideration all reasonable design options. PE results in better project definition and produces reliable estimates of project costs, benefits, impacts and risks. FTA emphasizes the quality and reliability of information attained during this phase as it is utilized in making critical project funding and procurement determinations carried forward into final design and construction. Hence, the project definition, i.e., scope, cost and schedule, is

close to being finalized during PE. SAFETEA-LU contains several sections that indicate Congress's keen interest in minimizing cost increases between stages of project development. If the information generated in New Starts preliminary engineering is to be reliable as the basis for making funding decisions for proposed New Starts projects, the final New Starts preliminary engineering cost estimate and financial plan should have very little likelihood of changing significantly in final design. Therefore, FTA places a cap on the FFGA New Starts funding amount at the point of approval to enter into final design. This does not mean, however, that all design must be completed in preliminary engineering. Rather, it means that the cost estimating process should specifically identify the main components of the project and add sufficient contingencies to cover the remaining design and cost uncertainties that will be addressed in final design and/or construction.

Key elements of preliminary engineering are:

- Identifying all environmental impacts and making adequate provisions for their mitigation in accordance with NEPA;
- Designing all major or critical project elements to the level that no significant unknown impacts relative to their costs or schedule will result;
- Completing all cost estimating to the level of confidence necessary for the project sponsor to implement its financing strategy, including establishing the maximum dollar amount of the New Starts financial contribution needed to implement the project; and
- Solidifying local funding commitments to the project.

In summary, preliminary engineering advances the project definition to the point where major uncertainties and risks associated with all project requirements, design and markets have been eliminated, resolved, mitigated, or delineated in a mitigation plan formally approved by FTA. To achieve these results, during PE project sponsors produce a project management plan to establish the approach, policies, procedures, roles and responsibilities for undertaking the project; undertake engineering surveys and studies to ascertain construction needs and requirements; identify and/or initiate all required real estate transactions, and utility, railroad and other third party agreements; and define all required contract or other procurement packages. This approach will, in most instances, require a different perspective on the work performed and costs eligible for Federal reimbursement than has traditionally been associated with preliminary engineering under the New Starts program. This process generally takes between 15 and 30 months. Not all projects, however, complete preliminary engineering, as some drop out of the New Starts pipeline, based on, for example, an inability to secure the local financial commitment, reconsideration of other alternatives in the corridor, or inclusion of cost prohibitive elements; these same factors may also contribute to extending preliminary engineering as the project sponsor seeks to address them.

Concurrently with refinement of project definition, the project sponsor must develop and/or update critical documentation and plans whereby FTA can determine the project sponsor's technical capacity and capability to undertake project development and implementation. Additionally, the project sponsor must also demonstrate adequate progress towards realizing acceptable New Starts ratings; these are the thresholds for certain criteria which are raised during the course of project development. FTA utilizes its Project Management Oversight program contractors to ensure that the engineering and other project development efforts progress

according to FTA requirements and that the project sponsor is adequately preparing for the final design stage of development.

Final Design

Final design is the last phase of project development during which the project sponsor prepares for construction. FTA approval to enter final design authorizes the project sponsor to undertake construction preparation activities such as utility relocations, right-of-way acquisition, development of detailed specifications, preparation of final construction plans, development of construction cost estimates, and development and/or solicitation of bid documents. Also during final design, the project definition is completed through further refinement, and any remaining uncertainties or risks associated with minor design scope and the procurement process are eliminated. The completion of project design also includes appropriate reallocation of project contingencies within the total budget commensurate with project requirements and market conditions. All third party agreements required for completion and/or operation of the project are negotiated and executed. The project management plan is further refined to incorporate the contingency and risk management requirements determined by FTA, and commitments of all non-New Starts funds specified in the financial plan are secured. A plan for the collection and analysis of data needed to undertake a “Before and After Study” is also developed. This process generally takes 9 to 15 months.

Finally, the project sponsor negotiates the specific terms and conditions for award of an FFGA that authorizes project construction. The FFGA includes: the physical and elemental descriptions of the project; the payment schedule of New Starts funds; the project schedule detailing construction, testing and start-up activities; the project budget defining all contingencies, vehicle procurements, and capital reserves, if applicable; the history of prior grants and major project milestones; and identification of the project’s environmental record. FTA also commissions a readiness report through the PMO program and an independent financial capacity assessment through the Financial Management Oversight (FMO) program to declare that the project sponsor is suitable to undertake the project construction via an FFGA. These FFGA preparation activities generally take between three and six months, depending on project complexity.

New Starts Project Evaluations

49 USC 5309(e)(1)(B) requires that New Starts projects “be justified based on a comprehensive review of (their) mobility improvements, environmental benefits, cost effectiveness, and operating efficiencies.” 49 USC 5309(e)(1)(C) further requires that there be adequate local financial support for New Starts projects. FTA defined several measures that address these project justification and local financial commitment criteria in its *Final Rule on Major Capital Investment Projects*, December 2000. FTA has published guidance that summarizes these measures and describes how FTA uses them to evaluate New Starts project at each stage of development. These criteria requirements are in addition to FTA’s standard capital program requirements that the project sponsor must demonstrate the technical, legal and financial capacity to undertake development of the proposed project.

FTA analyzes the information submitted by project sponsors and assigns a rating of *High*, *Medium-High*, *Medium*, *Medium-Low*, or *Low* to each of the individual project justification criteria and to the measures for local financial commitment. These criteria/measure-specific

ratings are then combined into summary ratings for both project justification and finance. These summary ratings are then combined into an overall project rating, which currently uses a three rating spectrum of *High*, *Medium* and *Low*. FTA assigns a summary project justification rating based on consideration of the ratings applied to the following project justification criteria: cost effectiveness, transit supportive land use and future patterns, mobility improvement, operating efficiencies, and environmental benefits. FTA assigns a weight of 50 percent each to both the cost effectiveness and land use criteria in order to establish a summary project justification rating. When the average of the cost effectiveness and land use ratings falls equally between two ratings, the mobility improvements rating is introduced as a “tiebreaker.” If well documented, and considered by FTA to be an unusually significant benefit to a proposed project that is not otherwise captured in the other New Starts criteria, “other factors” may increase a summary project justification rating by no more than one step. Consistent with congressional intent, as established by SAFETEA-LU, FTA will give particular attention to well documented and justified economic development impacts in its evaluation of “other factors” for candidate New Starts projects.

For the summary finance rating, FTA considers the project’s ratings for the capital and operating plans, as well as the non-Section 5309 New Starts share of project costs. The capital financial rating and operating financial rating are based upon the status of the funding proposed in the project’s financial plans, the completeness of the financial plan, and the financial capacity of the project sponsor to undertake the major capital investment. FTA designates the funds proposed in each financial plan as existing, committed, budgeted, or planned for the proposed major capital investment and ongoing operations and maintenance costs of the system. Ratings for the non-New Starts share of a project’s financial plan reflect FTA’s desire to leverage program funding across as many meritorious projects as possible. Congress has established a maximum share of 60 percent of New Starts funding towards the cost of any New Starts project. Consequently, the lower the New Starts share of costs, the higher the rating for this measure.

The table on the next page presents the pipeline of projects considered in the FY 2007 *Annual Report on New Starts*, their total capital costs, requested New Starts funding, and rating summaries. The average New Starts funding share of the 24 projects was 51 percent of total project costs for a total of \$12,371.7 million.

Summary project justification ratings and finance ratings are used to determine overall project ratings (a three rating spectrum of *High*, *Medium* or *Low*) according to the following decision rule:

- **High:** Projects must be rated at least *medium-high* for both finance and project justification;
- **Medium:** Projects must be rated at least *medium* for both finance and project justification; and
- **Low:** Projects not rated at least *medium* in both finance and project justification will be rated as low.

Summary of FY 2007 New Starts Ratings

			Total Funding in Millions			Project Rating		
			Capital Costs (YOE)	Requested Funding for New Starts	Pct of Capital Costs	Overall	Finance	Justification
Phase: Pending FY 2006 FFGA								
State	City	Project						
NY	New York	Long Island Rail Road East Side Access	\$7,779.3	\$2,632.1	34%	Medium	Medium	Medium-High
PA	Pittsburgh	North Shore LRT Connector	\$393.0	\$217.7	55%	Medium	Medium	Medium-High
Phase: Final Design								
CO	Denver	West Corridor LRT	\$593.0	\$290.6	49%	Medium	Medium-High	Medium
NC	Raleigh-Durham	Regional Rail System	\$809.9	\$485.4	60%	Low	Medium Low	Medium-Low
OR	Portland	South Corridor I-205/Portland Mall LRT	\$557.4	\$334.4	60%	Medium	Medium	Medium-High
OR	Washington County	Wilsonville to Beaverton Commuter Rail	\$117.3	\$58.7	50%	Medium	Medium	Medium
TN	Nashville	East Corridor Commuter Rail (1)	\$41.0	\$24.0	59%	Exempt	Exempt	Exempt
TX	Dallas	Northwest/Southeast LRT MOS	\$1,406.2	\$700.0	50%	Medium	Medium-High	Medium
UT	Salt Lake City	Weber County to Salt Lake City Commuter Rail	\$611.7	\$489.3	80%	Medium	Medium-High	Medium
Phase: Preliminary Engineering								
CA	Sacramento	South Corridor LRT Extension	\$197.1	\$98.6	50%	Medium	Medium	Medium
CA	San Francisco	Central Subway	\$1,412.5	\$762.2	54%	Medium	Medium	Medium-High
CT	Hartford	New Britain-Hartford Busway	\$335.5	\$167.8	50%	Medium	Medium	Medium
DE	Wilmington	Wilmington to Newark Commuter Rail Improvements (1)	\$54.9	\$24.9	45%	Exempt	Exempt	Exempt
FL	Miami	North Corridor Metrorail Extension	\$914.7	\$457.3	50%	Medium	Medium	Medium
MN	Minneapolis-Big Lake	Northstar Corridor Rail	\$265.2	\$131.0	49%	Medium	Medium	Medium
NY	New York	Second Avenue Subway MOS	\$4,947.8	\$1,300.0	26%	Medium	Medium	Medium-High
PA	Harrisburg	CORRIDORone Rail MOS(1)	\$87.0	\$24.9	29%	Exempt	Exempt	Exempt
PA	Philadelphia	Schuylkill Valley MetroRail	\$2,588.9	\$2,071.1	80%	Low	Low	Low
RI	Providence	South County Commuter Rail(1)	\$43.7	\$24.9	57%	Exempt	Exempt	Exempt
TX	Houston	North Corridor Rapid Transit MOS	\$359.7	\$179.8	50%	Medium	Medium	Medium
TX	Houston	Southeast Corridor Rapid Transit MOS	\$354.4	\$177.2	50%	Medium	Medium	Medium
VA	Norfolk	Norfolk LRT	\$203.7	\$99.8	49%	Medium	Medium	Medium
VA	Northern VA	Dulles Corridor Metrorail Project - Extension to Wiehle Avenue	\$1,840.1	\$920.0	50%	Medium	Medium	Medium
WA	Seattle	University Link LRT Extension	\$1,720.0	\$700.0	41%	High	Medium-High	Medium-High

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Project ratings are intended only to reflect the “worthiness” of a project, not the “readiness” of a project for an FFGA or other funding recommendation. Projects must be rated overall as *Medium* or higher to be approved to advance into preliminary engineering or final design, or to be considered for a Full Funding Grant Agreement. Further, projects must be rated as *Medium* or better for the cost effectiveness criterion to be recommended for an FFGA, unless exempted.

It cannot be overemphasized that project evaluation is an on-going process. FTA evaluation and rating occurs annually in support of budget recommendations presented in the *Annual Report on New Starts* as well as when projects request FTA approval to advance in the project planning and development process. Consequently, as proposed New Starts projects proceed through the project development process, information concerning costs, benefits, and impacts is refined and the ratings updated to reflect new information. Although New Starts projects are no longer evaluated and rated once an FFGA has been executed, FTA continues to monitor their construction, budgets and schedules for sufficient progress.

Full Funding Grant Agreements

FTA and sponsors of New Starts projects enter into a multi-year contractual agreement that formally establishes the maximum level of Federal financial assistance and outlines the terms and conditions of Federal financial participation in the project’s delivery. For projects requiring \$75 million or more in New Starts funding, the agreement is called a Full Funding Grant Agreement (FFGA). The FFGA defines the project, including cost, scope, and schedule; commits to a maximum level of New Starts financial assistance (subject to appropriations); establishes the terms and conditions of Federal financial participation; defines the period of time for completion of the project; and helps FTA and the project sponsor manage the project in accordance with Federal law.

The FFGA assures the grantee of predictable Federal financial support for the project, while limiting the exposure of the Federal government to cost increases that may result if circumstances at construction are different than project design, engineering, and/or project management processes may have anticipated. While FTA is responsible for assuring itself that planning projections are based on realistic assumptions and that design and construction follow acceptable industry practices, it is the responsibility of project sponsors to properly manage, design, engineer and construct projects.

For projects requiring less than \$75 million in New Starts funding with a total project cost of less than \$250 million, the agreement is called a Project Construction Grant Agreement (PCGA). FTA is currently developing the Small Starts PCGA development process that is the subject of rulemaking.

Under Section 5309(d) of SAFETEA-LU, an FFGA for the construction of a New Starts project may be made only if the Secretary determines that the proposed project:

- is authorized for final design and construction (under SAFETEA-LU Section 3043); and
- has been rated as *medium*, *medium-high*, or *high* in consideration of project advancement from alternatives analysis to preliminary engineering or from preliminary engineering to

final design and construction, based on the results of the alternatives analysis, the project justification criteria, and the degree of local financial commitment.

Prior to execution of the FFGA, FTA provides the Secretary of Transportation, the Office of Management and Budget, and the Congress the opportunity to review the FFGA and supporting documentation, and makes its staff available for briefings and/or presentations regarding the project and the FFGA to these reviewing bodies. By law, the Congress must be given 60 days' notice prior to award of a FFGA.

Principals for New Starts Funding Recommendations

FTA funding recommendations are the result of its extensive project development and evaluation processes. However, achieving the project development and evaluation thresholds is not a guarantee of a funding recommendation. Eligible projects may be recommended for multi-year funding in the President's budget only if budget authority is available and the project's proposed scope, cost estimate, and budget are considered final. In addition, notwithstanding its overall project rating, it is FTA policy to recommend for funding only those projects that achieve a rating of at least *medium* for cost effectiveness, unless the project has been specifically exempted from this policy.

When recommending annual funding allocations among proposed New Starts projects, FTA applies the following general principles:

- Any project recommended for new funding commitments should meet the project justification, finance, and process criteria established by 49 U.S.C 5309(e) and be consistent with Executive Order 12893, *Principles for Federal Infrastructure Investments*, issued January 26, 1994.
- Existing FFGA commitments should be honored before any additional funding recommendations are made, to the extent that funds can be obligated for these projects in the coming fiscal year.
- The FFGA defines the terms of the Federal commitment to a specific project, including funding. Upon completion of an FFGA, the Federal funding commitment has been fulfilled. Additional project funding will not be recommended. Any additional costs beyond the scope of the Federal commitment are the responsibility of the grantee, although FTA works closely with grantees to identify and implement strategies for containing capital costs at the level included in the FFGA at the time it was executed.
- Funding for initial planning efforts, such as alternatives analysis, is no longer eligible for Section 5309 funding under SAFETEA-LU, but may be provided through grants under the Section 5303 Metropolitan Planning or Section 5307 Urbanized Area Formula programs or from the newly created Section 5339 Alternatives Analysis program.
- Firm funding commitments, embodied in FFGAs, will not be made until projects demonstrate that they are ready for an FFGA, i.e., the final design process has progressed to the point where the project scope, costs, benefits, and impacts are considered firm and final.
- Funding should be provided to the most worthy investments to allow them to proceed through the process on a reasonable schedule, to the extent that funds can be obligated to such projects in the upcoming fiscal year. Funding decisions will be based on the results of the project evaluation process and resulting finance, justification, and overall ratings.

All FTA funding recommendations are subject to the annual appropriation of New Starts and other Federal funds by Congress.

Endnotes – Additional Information

- ⁱ A total of \$101.86 million, or seven percent of the program budget, was proposed for five projects, four of which were anticipated to be in final design by the Spring of 2006, pending resolution of outstanding issues. These four projects were not advanced in the project development process to the point of being considered for an FFGA at the time the President's Budget for FY 2007 was prepared, but demonstrated that they were making progress towards consideration for an FFGA in the near future. Each of these projects was rated pursuant to Section 5309 New Starts policy guidance, and received an overall rating of *Medium* or higher and possessed a *Medium* or better cost effectiveness rating or was exempted from the requirement for a *Medium* cost effectiveness rating.
- The fifth project included in the preceding budget recommendation was the Largo Metrorail Extension, which completed an FFGA in FY 2005 and began revenue service in December 2004. Section 3043(a)(31) and 3043(j) of SAFETEA-LU authorized the inclusion of an additional 52 rapid rail cars in the Largo Metrorail Extension FFGA. By this mandate, FTA included the Largo Metrorail Extension in this funding category, even though the original FFGA had been completed and revenue service for the project had begun.
- In addition to the preceding project recommendations, funding recommendations were made for: the new Small Starts program in a total of \$100 million; and specific ferry projects, statutory funding to support the work of the Denali Commission, and New Starts project management oversight activities in a total of \$34.66 million.
- Beyond the specific project and/or program funding recommendations, there were another thirteen projects in the New Starts pipeline with a total of \$4,629.1 million New Starts funds being requested by the project sponsors, 316 percent of the total FY 2007 New Starts program budget request. These pipeline projects were in the preliminary engineering stage of project development and, thus, were too early in development to warrant any of the funding considerations discussed above.