Agenda Item 5a

METROPOLITAN
TRANSPORTATION
COMMISSION

Joseph P. Bort MetroCenter
101 Eighth Street
Oakland, CA 94607-4700
TEL 510.817.5700
TDD/TTY 510.817.5769
FAX 510.817.5848
E-MAIL info@mtc.ca.gov
WEB www.mtc.ca.gov

Memorandum

TO: Legislation Committee

DATE: September 4, 2015

FR: Executive Director

W. I. 1131

RE: Overview of the Senate-passed DRIVE Act

DRIVE Act Summary

Senators involved in federal transportation policy had a very busy month in July. Senate Bill 1647 (Inhofe), the DRIVE Act — Developing a Reliable and Innovative Vision for the Economy — was approved by the Senate Environment and Public Works (EPW) Committee on July 15, then amended and passed by the full Senate just two weeks later by a vote of 65-34 (as H.R. 22). The 1,034 page bill authorizes funding for six years, but identifies sufficient funds to support only the first three years. As such, our analysis in this memo is limited to those first three years — FY 2016-2018.

While there was a fleeting hope that the House might take up the Senate bill and enact a multi-year transportation act before the summer adjournment, this proved too heavy a lift so, yet again, we are operating under another stop-gap extension, this time authorizing the federal surface transportation program through October 29, 2015.

Summary

Overall, the key structure and policy provision in the EPW Committee version of the DRIVE Act we reported on in July are continued in the Senate-enacted bill. The structure of the well-established highway and transit programs, many of which have been on the books for decades now, are maintained while some of the policy changes made by the Moving Ahead for Progress in the 21st Century (MAP 21), enacted in 2012, are expanded upon. For instance, the Surface Transportation Program and Congestion Mitigation and Air Quality Program (STP/CMAQ) — which form the mainstay of the One Bay Area Grant program — are maintained, but a few changes related to formulas and funding eligibility are proposed, as noted in detail in Attachment 1. Unfortunately, the bottom line result of these changes could trigger a decrease in STP funding for the Bay Area of about 6 percent in FY 2016 compared to FY 2014 but this is somewhat offset by an increase in CMAQ funding.

Also offsetting the reduction in STP funding is a change made to the Transportation Alternatives Program (TAP). Funding for TAP is increased by 4 percent in FY 2016 over current levels and the share distributed by population is raised from 50 percent to 100 percent, doubling the region's guaranteed share. After the increase to $850 million in FY 2016, however, TAP funding is held flat thereafter.

The most significant changes made by the DRIVE Act are arguably the establishment of funding for a National Freight Program, an array of project delivery/environmental streamlining provisions, and the incorporation of rail policy and funding into the surface transportation act for the first time.

Funding for Bay Area

When the increase in the suballocated portion of TAP funding is taken into account, the Bay Area's share of suballocated highway formula funding would grow from approximately $160 million in FY 2015 to $164 million in FY 2016, reaching $170 million in FY 2018[1].With respect to transit funding, the region would receive an increase of 6 percent in funding, from $399 million in FY 2015 to $424 million in FY 2016 with the largest increase in the State of Good Repair Program. Attachment 2 provides detailed funding levels for the Bay Area and California.

National Funding

The bill provides modest increases in funding for highways and transit. Surprisingly, while highway funding would be 10 percent higher by FY 2018 than FY 2015, transit funding grows by 13 percent. (According to *Eno Transportation Weekly*, one need only look at this fact to see why there was little chance the House would adopt the Senate's bill without modifying it.)

Steve Heminger

SH: rl
J:\COMMITTE\Legislation\Meeting Packets\Legis2015\09_Legis_Sept 2015\5a_DRIVE Act Summary.docx

[1] Estimating the impact of the DRIVE Act on the Bay Area is challenging due to uncertainty about certain discretionary decisions that could be made by Caltrans to augment regional funding statewide. To hold regional funding steady in the wake of changes to the Surface Transportation Program formula made by MAP 21, Caltrans steered $22 million more than required to regions in FY 2013 and FY 2014. This was an entirely discretionary decision on the part of Caltrans. Given this, our estimate for the region's share of federal funds does not presume this policy continues, though staff will certainly continue to advocate for the maximum share of STP funds to be suballocated regionally.

Summary of DRIVE Act, H.R. 22

Funding

To support the proposed funding levels in the DRIVE Act, the bill transfers $45.6 billion from the General Fund to the Highway Trust Fund (HTF) to fill the gap between proposed expenditures and forecast HTF receipts. These General Fund costs are offset by a number of different mechanisms, referred to as "pay fors" in Washington speak. They include the sale of 101 million barrels of oil from the Strategic Petroleum Reserve, provisions related to estate tax reporting, and changes to the interest rate banks earn from deposits in the Federal Reserve. Some of the original proposals included in the Senate EPW Committee’s version of the bill were dropped prior to the bill’s passage in the Senate. As time goes on, opposition is also growing against those that remain.

There is also significant disagreement between the House and the Senate on the best way to pay for a bill. Whereas Senate Finance Committee Chairman Orin Hatch supported the shotgun approach used in the Senate bill, House Ways and Means Committee Chairman Paul Ryan favors funding the bill through broad corporate tax reform that includes voluntary repatriation of offshore profits. This fundamental dispute over the “pay fors” makes resolving differences by October 29 challenging even before more substantive policy disagreements are taken into consideration.

FEDERAL HIGHWAY PROGRAM

Bill Delivers on a National Freight Program

The DRIVE Act responds to the growing call by the business community and state, regional and local transportation agencies for a *funded* National Freight Program. While MAP 21 established a framework for national freight policy by establishing a national freight network and recommending states adopt freight plans, there was no money behind it. The DRIVE Act includes formula and competitive funding for freight projects and, in a positive step, significantly broadens the federal freight focus from highways to a multimodal freight system. While this is a victory of sorts, it is a (not surprising) disappointment that the bill includes no dedicated freight-specific funding source, but instead changes the existing FHWA formula programs to accommodate freight.

The bill includes these other notable freight policy elements:

- Establishes a National *Multimodal* Freight Network comprised of connectors, corridors, facilities of all freight modes.
- Adds a new category “critical urban freight corridors” to the elements of the National Highway Freight System. For urbanized areas over 500,000 such corridors shall be identified by the metropolitan planning organization (MPO), in consultation with the state. For urbanized areas below 500,000, the state shall designate such corridors, in consultation with the MPO.
- Requires states to establish a State Freight Advisory Committee within two years of enactment as a condition of receiving funding for the program and develop a freight plan. Under MAP 21, this was optional.
- Revises definitions related to the existing “National Freight Network” to clarify that they refer to a National *Highway* Freight Network (NHFN). Expands the NHFN from 27,000 miles to 30,000 and allows for re-designation every five years, instead of 10. Each re-designation may add an additional 5 percent of miles.

Two New Freight Funding Programs

- **National Highway Freight Program**
  - This program receives almost $1 billion in FY 2016, growing to almost $2 billion by FY 2018. Each state's share is equivalent to its share of all highway formula apportionments.
  - For states whose primary highway freight system comprises 3 percent or more of the national total mileage on the Primary Highway Freight System funds must be spent on projects on 1) the primary highway freight system; 2) critical rural freight corridors or 3) critical urban freight corridors. For states below the 3 percent threshold, funds may be spent on any component of the National Highway Freight Network.
  - The bill caps at 10 percent the share of funds that may be spent within the boundaries of public and private freight rail, water facilities (including ports) and intermodal facilities for projects that provide surface transportation infrastructure necessary to facilitate intermodal transfer and access to the facility.

- **Assistance for Freight Projects**
  - This multimodal, competitive $200 million/year freight program is for projects consistent with the DRIVE Act's Multimodal Freight Policy Goals, including enhancing economic competitiveness by improving reliability and reducing congestion in the freight transportation system and improving productivity for domestic businesses.
  - Projects are selected by the Secretary of Transportation. Congressional notification of project selection is required 72 hours prior to public notification with information justifying the project selection decision.
  - The bill sets a minimum grant threshold of $10 million and a maximum of $100 million, with exceptions for rural areas.
  - The bill caps the federal share at 80 percent and gives priority for projects that require federal funds to complete the funding plan.

Surface Transportation Program

- The bill reduces STP's share of FHWA formula funds (what remains after the National Freight Program, CMAQ, Metropolitan Planning and TAP takedowns) from 29.3 percent to 29 percent.
- Provides that 15 percent of each state's STP funding be spent on non-National Highway System bridges, with 50 percent to be spent on non-federal aid highways. Whereas in MAP 21, this set-aside was applied specifically to the *state's* half of STP funding, now the takedown is made "off the top." This results in a significant cut to the portion of STP funding that is suballocated on the basis of population. The bill makes a noteworthy change to terminology used to identify a roadway or bridge as in need of repairs. Specifically, the bill replaces the term "structurally deficient" with "being in poor condition."
- Somewhat offsetting the impact of this change, the bill increases the share of the remaining STP funds that are apportioned on the basis of population from 50 percent to 55 percent. Nevertheless, the 15 percent off-system bridge set-aside represents an overall reduction of suballocated STP funding from 50 percent of STP to 46.8 percent, a drop of 6.5 percent.

- Nationally, STP funding takes a minor 1 percent cut in FY 2016, followed by a 2 percent growth rate thereafter. But because of the 15 percent set-aside taken off the to, the Bay Area's STP funding would decline from approximately $81 million in FY 2014 to $77 million in FY 2016, a drop of 5.5 percent. STP funding would not recover to pre-DRIVE Act levels within the three-year time-frame of the bill. These reductions could be partially offset by discretionary action taken within California to shift additional STP funds to regions, as was done after the enactment of MAP 21. They could also be offset by growth in the CMAQ and TAP programs, as noted below.
- The bill retains flexible project eligibility, adding the installation of vehicle-to-infrastructure communication equipment as a new category.

Congestion Mitigation & Air Quality

- The bill makes some potentially significant policy changes related to CMAQ. Specifically, for areas out of attainment for fine articulate matter (PM 2.5), including the Bay Area, the bill requires that states and MPOs give priority to projects that reduce "directly emitted PM 2.5 emissions, including diesel retrofits." The bill further states that "*to the maximum extent practicable, PM2.5 priority funding shall be used on the most cost-effective projects and programs that are proven to reduce directly emitted fine particulate matter*." This could undermine the region's flexibility with respect to CMAQ programming as the intent is to focus CMAQ funds on direct, tailpipe, engine-related projects as opposed to transportation improvements which also may conflict with state GHG emission reduction targets and CMAQ funding to *indirectly* reduce PM2.5 by reducing vehicle trips.
- The bill also clarifies that CMAQ funds may be used not only for attainment of ambient air quality standards but also to maintain standards in an attainment area.
- The bill provides that port-related freight operations may be eligible for CMAQ funds.

Transportation Alternatives Program

- The DRIVE Act take redirects the state share of funding under the Transportation Alternatives Program to local governments so that 100 percent of TAP funding would be directed by localities versus 50 percent under current law. The bill authorizes $850 million for TAP annually.

Assistance for Major Projects Program (AMP)

- The bill authorizes a new highway-focused mega project competitive program with projects selected by the Federal Highway Administrator. This replaces the current TIGER Program which has been operated by the Office of the Secretary. While the Senate EPW Committee version of the bill required Congressional approval of a final list (giving Congress the role of winnowing down a much larger submittal), the version approved by the full Senate removed this provision.
- The AMP is authorized at $250 million in year 1, reaching $350 million by year 3. Requests must be a minimum of $50 million for a project with a cost of at least $350 million.
- To qualify for AMP funding, the FHWA Administrator must find the project is: 1) consistent with national goals; 2) will improve the performance of the national surface transportation network regionally or nationally; and 3) will either generate economic benefits, reduce long-term congestion, increase the speed, reliability and accessibility of the movement of people or freight or improve safety.

- No state may receive more than 20 percent of funds in a single year.
- No more than 20 percent of AMP funds may be spent on non-highway projects.

Highway Safety Improvement Program

Funding for the HSIP took a significant hit in the DRIVE Act relative to other programs. In addition, the program eligibility was broadened to include installation of vehicle to infrastructure safety projects and projects that provide separation between pedestrians and motor vehicles.

Tolling

The bill amends federal tolling statutes to more broadly allow tolling on Interstates as long as the number of toll-free, *non-high occupancy vehicle (HOV) lanes*, excluding auxiliary lanes, remains the same after the construction. The bill also removes a distinction between interstate and non-interstate lanes with respect to allowing HOV lanes to be converted to express lanes. Under current law, only HOV lanes on the interstate system are expressly authorized to impose tolls. The bill also requires that private buses serving the public be given equal access to toll facilities on the same terms as public buses.

Transportation Infrastructure Finance and Innovation Act (TIFIA)

The TIFIA program takes a substantial cut in the bill from $1 billion in FY 2015 to $300 million thereafter. From a practical standpoint, this may have little impact since the program has been significantly undersubscribed. The bill incorporates some positive changes to TIFIA, broadening project eligibility to allow project sponsors to seek financing for a suite of projects, not just a single project, reducing bond rating requirements, and authorizing Transit Oriented Development projects and the purchase of land for habitat conservation as eligible projects. On a related note, the bill authorizes $12 million for a Regional Infrastructure Accelerator Program from the General Fund for a program to assist public agencies in accelerating TIFIA-eligible projects.

Vehicle to Infrastructure Equipment and Intelligent Transportation Systems

In an interesting development that could portend major changes to our transportation system, the bill allows the installation of vehicle-to-infrastructure communication equipment to be eligible for NHPP and STP funding. The bill also authorizes DOT to establish a $30 million competitive national grant program to accelerate ITS projects from existing ITS funding.

PLANNING PROVISIONS

The bill clarifies that for the purpose of meeting the requirement in Section 134 of Title 23 (added by MAP 21) that a metropolitan planning organization must include a representative of a transit operator on its board, a person may serve in a dual capacity as both a transit representative as well as a representative of a local municipality. This change is consistent with MTC's opinion that we already comply with this provision.

The bill requires MPOs make intermodal facilities dealing with intercity buses and vanpools part of our long-range plans. In an acknowledgment of the increasing vulnerability of the nation's transportation system to the changing climate, the bill broadens the scope of the metropolitan planning process to require consideration of projects and strategies that will "improve resilience and reliability of the transportation system" as a goal of long-range plans.

Performance Measures

Related to performance measures, the bill requires the FHWA Administrator to develop datasets and analysis tools to help MPOs, states and FHWA carry out performance management requirements and allocates $10 million for this purpose. The bill also establishes a grant program "for achievement in transportation for performance and innovation. The program is designed to provide grants to reward achievement in "transportation performance management" and the implementation of strategies that achieve "innovation and efficiency. States, local government, MPOs and other entities are eligible and the program is authorized at $150 million annually from the General Fund.

Complete Streets: Design Standards Broadened to Allow for Local Flexibility

The DRIVE Act contains an important change sought by the National Association of City Transportation Officials to provide more flexibility in design standards for federally-funded projects. Specifically, it includes a provision enabling local jurisdictions to use different roadway design guides than its state DOT uses, if the locals are the project sponsor. Additional language is included to require the federal standards to address the needs of all roadway users, including non-motorized.

Electric Vehicle Charging

The bill requires US DOT to designate national electric vehicle charging and natural gas fueling corridors from a list of nominees suggested by state and local officials.

TRANSIT PROVISIONS

Overall, transit funding fares well in the DRIVE Act, with the Federal Transit Administration's overall authorized levels growing from $10.7 billion in FY 2015 to $12.7 billion in FY 2018. For the Bay Area, our overall transit formula funding would grow from $399 million in FY 2015 to $424 million in FY 2016, reaching $446 million in FY 2018. In terms of our Transit Capital Priority program, the bill would provide $76 million more than our current estimates for the FY 2016-18 timeframe.

State of Good Repair

This program — which the Bay Area receives the largest share of compared to other transit formula programs — receives the biggest increase of all the transit formula programs. Funding grows from $2.2 billion in FY 2015 to $2.5 billion by FY 2018, an increase of 17 percent. For the Bay Area, funding increases 12 percent from FY 2015 to FY 2016, from $171 million to $193 million. Out year growth is not as dramatic, with funding reaching $201 million by FY 2018.

Urbanized Area Formula & Growing & High Density States

This program remained intact with few changes, one being a requirement that the grant recipient maintain their equipment and facilities in a state of good repair. The bill also gives the Secretary the discretion to grant temporary and targeted operating assistance to large urbanized areas that have a three-month unemployment rate greater than seven percent. Further, it allows section 5307 funds to be used to finance the operating cost of equipment and facilities for two consecutive fiscal years. Overall, the Bay Area's share of this funding would grow from approximately $208 million to $212 million.

Capital Investment Grants (aka "New Starts")

This program also receives a major boost in the DRIVE Act, growing from $1.9 billion in FY 2015 to $2.4 billion, an increase of 26 percent.

- The Small Starts definition was revised upwards so that a project requesting $100 million or less qualifies (up from $75 million) with a total cost of $300 million (up from $250 million).
- The definition of a core capacity project was expanded to include more state of good repair types of projects.
- Removes references to "land-use patterns" from the criteria for grants.
- Establishes a pilot project to expedite project delivery for projects seeking a federal funding level of 25 percent or less.
- Defines a "core capacity improvement" as a project that increases capacity of a corridor by at least 10 percent, which may include projects designed to make substantial progress on state of good repair.
- Authorizes grants for projects that provide both intercity passenger rail and public transportation improvements.
- Projects requesting 25 percent or less in federal funds receive a streamlined review process.

Bus & Bus Facilities

The bill keeps the current Bus and Bus Facilities formula program intact, while adding a new competitive program at $180 million in FY 2016, growing to $190 million by FY 2018. Funding for the Bus and Bus Facilities formula program grows from $429 million in FY 2015 to $495 million in FY 2018, a 15 percent jump. Much bigger increases are proposed in the out years, with the FY 2021 funding level set at $626 million. For the Bay Area, funding would stay roughly flat at $13 million in FY 2016, reaching $15 million by FY 2018.

Buy America

The bill raises the percentage of domestic rolling stock required from 60 percent to 70 percent by 2020 and makes changes relative to iron and steel content requirements. It also requires the Federal Transit Administration Secretary to provide public documentation for every rejection of a Buy America waiver request. The American Public Transportation Association along with transit vehicle manufacturers and major component suppliers have expressed concerns about both the domestic content changes and provisions on iron and steel.

Leasing Rules

The bill relaxes the rules with respect to leasing transit vehicles to allow for "innovative leasing opportunities."

Rail

The DRIVE Act is notable for including a rail title, covering Amtrak and rail safety requirements. Typically, Amtrak funding and safety requirements are dealt with in stand-alone legislation, as was done by the House earlier this year. The bill includes increased funding for passenger rail, including authorizations of funding for state grants, and significant improvements to the Railroad Rehabilitation and Improvement Financing (RRIF) program. The bill also authorizes additional funding for positive train control (PTC) implementation grants and RRIF loans, and extends the deadline for PTC systems to the end of 2018.

Other key rail-related provisions include:

- Requires Amtrak to submit to Congress a five-year asset plan and five-year business plan every year.
- A requirement that Amtrak report to Congress within one year on options to enhance economic development and accessibility around its stations.
- Authorization of operating assistance grants to restore routes to regions underserved by public transportation and to foster economic development.
- Authorizes DOT to issue competitive grants to fund projects that ease backlog of repairs for intercity rail projects where the federal share does not exceed 50 percent.

Project Delivery

The bill contains a number of different provisions related to project delivery streamlining, including:

- o Indexing to the Consumer Price Index the minimum funding levels for projects to be categorically excluded from the National Environmental Policy Act
- o Requiring DOT to provide a written response with respect to the environmental review process.
- o Requiring establishment of an online database for reporting on progress of reviews, approvals and permits related to NEPA. adjusting for inflation the dollar thresholds for projects that qualify for Categorical Exclusions
- o Allowing for greater reliance on documents prepared during the planning process
- o Improving collaboration between the lead agency and the participating agencies
- o Allowing U.S. DOT agencies to adopt environmental documents produced by another U.S. DOT agency if the projects are substantially the same
- o The bill includes a proposal by MTC staff to extend to FHWA a policy similar to the "letter of no prejudice" policy applicable to grant programs administered by the Federal Transit Administration whereby a project sponsor is allowed to incur costs for preliminary engineering/environmental review activities prior to the project receiving federal approval *at their own risk*. This option could cut the timeframe for federally funded projects by at least two to three months.

Estimated Funding to California & the S.F. Bay Area from Senate-Enacted DRIVE Act, H.R. 22

Statewide Funding	FY 2014 Actuals	FY 2015 Est.	FY 2016	FY 2017	FY 2018	FY 2018 vs. FY 2014	Average 3-Year Annual Growth
Surface Transportation Program (STP)	$ 887,888,994	$ 887,888,994	$ 878,114,221	895,361,000	914,095,695	26,206,701	0.99%
Congestion Mitigation & Air Quality (CMAQ)	$ 437,076,772	$ 463,637,790	$ 463,277,051	$ 472,376,000	$ 482,260,220	$ 45,183,448	1.33%
STP/CMAQ Subtotal	$ 1,324,965,766	$ 1,351,526,784	$ 1,341,391,272	$ 1,367,737,000	$ 1,396,355,915	$ 71,390,149	1.10%
Transportation Alternatives Program (TAP)	$ 73,307,997	$ 73,307,997	$ 75,999,000	$ 75,999,000	$ 75,999,265	$ 2,691,268	1.22%
Subtotal Suballocated Programs	$ 1,398,273,763	$ 1,424,834,781	$ 1,417,390,272	$ 1,443,736,000	$ 1,472,355,180	$ 74,081,417	*1.11%*
National Highway Performance Program	1,930,325,220	1,930,325,220	1,968,187,047	2,006,843,537	2,048,835,179	*$ 118,509,959*	2.01%
National Freight Program	--	--	92,438,109	134,035,259	184,876,219	*NA*	
Highway Safety Improvement Program	196,843,319	196,843,319	166,398,473	169,966,765	173,842,916	*$ (23,000,403)*	-3.68%
Rail-Highway Crossings Program	15,280,331	15,280,331	15,280,331	15,280,331	15,280,331	*$ -*	0.00%
Metropolitan Planning	48,492,758	48,492,758	49,737,973	51,266,986	53,006,403	*$ 4,513,645*	3.01%
Grand Total Formula Programs	**$ 3,542,468,412**	**$ 3,542,468,412**	**$ 3,709,432,470**	**$ 3,821,129,223**	**$ 3,948,196,228**	**$ 405,727,816**	*3.68%*
Bay Area Funding	FY 2014 Actuals	FY 2015 Est.	FY 2016	FY 2017	FY 2018	FY 2018 vs. FY 2014	Average 3-Year Annual Growth
Federal Highway Administration							
Surface Transportation Program (STP)	$ 81,737,955	$ 78,080,916	$ 77,221,323	$ 78,738,004	$ 80,385,532	$ (1,352,423)	0.99%
Congestion Mitigation & Air Quality (CMAQ)	$ 67,773,591	$ 71,892,171	$ 71,836,234	$ 73,247,127	$ 74,779,785	$ 7,006,194	1.33%
STP/CMAQ Subtotal	$ 149,511,546	$ 149,973,087	$ 149,057,557	$ 151,985,131	$ 155,165,317	$ 5,653,771	1.15%
Transportation Alternatives Program (TAP)	$ 9,851,500	$ 9,851,500	$ 14,587,686	$ 14,587,686	$ 14,587,686	$ 9,336,186	16.03%
Grand Total	**$ 159,363,046**	**$ 159,824,587**	**$ 163,645,244**	**$ 166,572,817**	**$ 169,753,003**	**$ 10,389,957**	**2.03%**
Federal Transit Administration							
Urbanized Area Formula (5307/5340)	$ 208,984,999	$ 208,447,779	$ 212,000,000	$ 216,680,000	$ 223,740,000	$ 14,755,001	2.39%
State of Good Repair (5337)	$ 170,320,038	$ 171,411,774	$ 192,580,000	$ 196,660,000	$ 200,950,000	$ 30,629,962	5.55%
Bus & Bus Facilities (5339)	$ 13,072,341	$ 13,020,000	$ 13,110,000	$ 13,400,000	$ 15,070,000	$ 1,997,659	5.12%
Senior & Disabled (5310)	$ 4,544,537	$ 4,317,000	$ 4,403,000	$ 4,501,000	$ 4,603,000	$ 58,463	2.16%
Rural Transit (5311)	$ 1,907,560	$ 1,598,000	$ 1,629,000	$ 1,665,000	$ 1,703,000	$ (204,560)	2.14%
Grand Total	**$ 398,829,475**	**$ 398,794,553**	**$ 423,722,000**	**$ 432,906,000**	**$ 446,066,000**	**$ 47,236,525**	**3.82%**

Source: FHWA Tables Estimating DRIVE Funding provided by Caltrans

1) FY 2014 and FY 2015 TAP Estimates are based on average of 3-year funding received.