

One Bay Area Grant Program CMA Comments

- The OBAG program has been under development since summer of 2011 and the CMAs have generally been supportive of the OBAG grant and understand its relationship to advancing the Sustainable Communities Strategy.
- There have been several versions released for review to the CMAs and the public, and each iteration has included significant policy, financial and inventory requirements that have a strong focus on supporting the SCS, which is under development and planned to be adopted with a certified EIR in April 2013.
- The CMAs have worked collaboratively and closely with MTC staff providing feedback on each version of the OBAG grant.
- However, the most recent version of OBAG released on May 5th, has extensive requirements for the CMAs to fulfill that are not in the purview of the CMA responsibilities, and are specifically related to housing, which is more appropriately a function of ABAG.
- Our roles and responsibilities as CMAs are to manage and make investments in transportation projects and programs that address congestion, improve access and expand mobility.
- The OBAG grant as currently proposed doesn't have any transportation related criteria in the funding formula for STP/CMAQ funding allocations. The transportation funding components have been abandoned and completely replaced with housing criteria for funding allocations.
- This cycle of OBAG should be focused on a transition period between the adopted T-2035 RTP goals, which largely focus on Fix-it-First, and a new SCS focused program as proposed for Plan Bay Area.
- More specifically, this cycle of OBAG should do the following:
- ***Make this funding cycle a transition period to allow jurisdictions time to develop local policies to support the proposed OBAG requirements***
 - The CMAs need to have adequate time to develop good quality policies in collaboration with our local jurisdictions so they can have buy in and the CMAs can make effective funding and implementation decisions.

- For example, MTC could work closely with the CMAs over the coming year to develop effective policies that will ultimately result in greater achievement of the goals intended by the OBAG grant, rather than a rushed process.
- ***Allow the Complete Streets requirement to be fulfilled in the form of a General Plan amendment, policy, or other enforceable action at the discretion of the jurisdiction's governing body that meets the intent of the complete streets requirement, and allow it to be adopted by July 2013.*** We appreciate that a resolution is allowed in the current version, but request more time to fulfill this requirement.
- ***Change the PDA Investment and Growth Strategy into a PDA Transportation Investment Strategy***
 - In the current OBAG proposal, we are concerned that the timeframe for development of a PDA Investment and Growth Strategy is not realistic and many of the requirements are beyond the roles and responsibilities of CMAs. CMAs have no jurisdiction over housing elements or local development regulations. Developing a detailed PDA transportation investment strategy by the end of the OBAG cycle will allow enough time for the detailed work that is necessary.
 - The current proposal to require a percentage (70% or 50% depending upon the county) of OBAG funds to be spent in PDAs is an adequate short-term requirement to obtain PDA-focused investments. The results of this PDA-focused spending can be measured and reported upon at the end of the OBAG period.
 - Allow this to be defined locally and accept previous locally adopted Growth strategies.
 - It is requested that MTC continue working with local jurisdictions to develop a workable process and to provide adequate time and resources to do so; the current timeframe to complete this work is unrealistic.
- ***Allow projects that already meet the intent of the OBAG program to be advanced now***
 - Several of the CMAs have projects ready now that meet the intent of the OBAG program and the funding requirements of STP/CMAQ funds, and should be allowed to move forward now, and not be held up by policies that will take time to develop. This should include allowing projects that meet the OBAG intent to move forward even if a jurisdiction does not currently meet the OBAG requirements.
- ***The adoption of the OBAG program as it currently is written will create difficult challenges for delivery of projects and programs and could result in significant delays.***
- ***These issues need to be resolved so we can ensure we are delivering high quality and effective transportation investments to the public, based upon sound policies and practices.***