



Memorandum

TO: Planning Committee

DATE: January 5, 2018

FR: Executive Director

W.I. 1311

RE: MTC Resolution No. 4316: Community-Based Transportation Planning (CBTP) Program Guidelines

Based on feedback at last month's Planning Committee meeting, the committee deferred action on this item until January to address some questions and better align the CBTP Program with the Lifeline Transportation Program, also slated for Commission consideration this month.

Background

Launched in 2002, the CBTP Program evolved out of two regional studies completed in 2001: one on the Lifeline Transportation Network (LTN), and the other on Environmental Justice (EJ). The LTN study identified travel needs and challenges in low-income communities, and recommended establishing a regional program to fund community-based planning in disadvantaged communities. Similarly, the EJ study identified the need for MTC to support local planning efforts in low-income communities.

Since 2002, the CBTP Program has provided roughly \$2.6 million in funding for over 40 collaborative planning processes in low-income communities¹ across the region. These processes have:

- Meaningfully engaged residents and other stakeholders, including community and faith-based organizations, local jurisdictions, transit operators, county Congestion Management Agencies (CMAs) and MTC; and
- Resulted in plans that include locally-identified transportation needs, solutions and priorities.

Each plan reflects the following three goals and objectives of the regional program:

- Emphasize resident participation in the plan development process;
- Foster collaboration between residents, community organizations, local jurisdictions, transit operators, CMAs and MTC; and
- Build local capacity by engaging community-based organizations throughout the process.

¹ MTC defined low-income communities as Communities of Concern even though the CoCs are identified using many other factors such as race/ethnicity, age (over 65 years), disability, rent burden, linguistic isolation, and vehicle ownership.

Planning Grants

MTC has funded multiple cycles of CBTP grants. Starting in the 2002-2003 cycle, MTC funded five CBTPs,² as a pilot. CMAs received \$60,000 in State Transit Assistance (STA) funds for each CBTP for resident engagement, needs assessment, and developing a priority list of projects within the planning area. Projects identified in CBTPs were eligible to compete for funding through MTC's Lifeline Transportation Program.³ Over two more cycles, MTC funded 35 CBTPs at \$60,000 each⁴.

In November 2015, the MTC Commission set aside \$1.5 million from the second round of the One Bay Area Grant (OBAG) Program for a fourth cycle of CBTPs.

Draft guidelines for the 2017-2021 cycle of the CBTP Program are included as Attachment A of MTC Resolution No. 4316 for review and comment. A summary of the key elements and revisions to the guidelines include:

- Funding distributed by low-income population to each county with a minimum of \$75,000 and a maximum of \$300,000;
- More flexibility to coordinate with other planning efforts, and develop CBTPs across multiple CoCs;
- New use it or lose it provisions to ensure plans are delivered in a timely manner;
- New requirements for local match and set asides for community engagement;
- More flexibility for CMAs to designate additional disadvantaged communities for CBTP activity to reflect local conditions after consideration and approval by MTC;
- New requirement for CMAs to establish a steering committee to include social service agency and CBOs or non-profits to ensure a collaboration and inclusive CBTP planning process; and
- New requirements for CMAs to update the needs assessment components of CBTPs every five years and to track and report progress on implementation of projects and programs identified in CBTPs.

The CBTP Guidelines reflect strategies that incorporate public feedback related to community engagement, steering committee, and reporting requirements. This includes incorporation of: inclusive engagement to low-income populations including recommended financial incentives, a new steering committee requirement, and enhanced monitoring and evaluation to better track implementation of CBTP priorities. The Commission will be considering guidelines in January for both the Lifeline Transportation Program and the CBTP Program, with the Lifeline Transportation Program guidelines on the Programming and Allocations Committee agenda.

2 The 2001 Regional Transportation Plan (RTP) designated forty one CoCs.

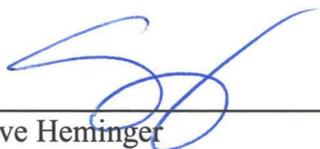
3 For more information on MTC's Lifeline Transportation Program, see: <https://mtc.ca.gov/our-work/fund-invest/investment-strategies-commitments/transit-21st-century/lifeline-transportation>

4 TAM funded the CBTP in Novato, as it is not an MTC-designated CoC.

A map of CoCs from PBA 2040 is included in Attachment A of MTC Resolution No. 4316. The map reflects 2014 American Community Survey (ACS) data on the individual functions that contribute to CoCs, which was the most current data available when the map was prepared for PBA 2040. ACS 2016 data was recently released and the map has not yet been updated to reflect this most recent data. Staff will report back to the Planning Committee with an updated map showing the 2016 data at a future meeting. The list of CBTPs funded through the previous three cycles is included as Attachment B to this memo.

Next Steps

Staff is requesting the Planning Committee refer MTC Resolution No. 4316 – the draft guidelines, for the 2017-2021 cycle of the CBTP Program, included in Attachment A of MTC Resolution No. 4316 – to the Commission for approval.



Steve Heminger

Attachments:

- Attachment A: Public Comment Received
- Attachment B: List of Funded and Completed CBTPs (2002 to 2017)
- MTC Resolution No. 4316, 2017-2021 CBTP Program Guidelines
- Presentation

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Proposed Key Changes to Lifeline Guidelines

The Metropolitan Transportation Commission (MTC) must meet its commitment to advance regional transportation equity under Plan Bay Area 2040 by addressing mobility and public transportation access needs of low-income and other underserved Bay Area residents. In particular, we urge MTC to revise the existing guidelines to the Lifeline Transportation (Lifeline) Program and the Community-based Transportation Planning (CBTP) Program so that MTC could fulfill this commitment. The following principles and associated key recommended changes to the two program guidelines correspond with and elaborate on recommendations included in the 6 Wins Network Proposal (Proposal) that we shared in March 2017 (last updated in August 2017).

Principles

Principle 1: Engage and build leadership by low-income and communities of color. Low-income and other underserved residents are the experts of their own transportation needs. Therefore, building robust community engagement and leadership will fulfill Lifeline’s purpose of funding “community-based transportation projects” that “result in improved mobility for low-income residents,”¹ and similarly the CBTP Program’s purpose of meeting “transit needs in economically disadvantaged communities”.² Such engagement has the potential to develop capacity and civic leadership among community members to engage in transportation decision-making.

Principle 2: Ensure community decision-making. Low-income residents and other underserved residents and community-based organizations (CBOs) and/or non-profit organizations that work with these residents must also have decision-making power in every step of implementing both programs, including process design, needs assessment, project development, and project selection.

Principle 3: Ensure that low-income and underserved residents determine priorities. Lifeline funds should be spent on projects that address the current priority needs and investments identified by low-income and other underserved residents under a recent CBTP or equivalent planning process.

Principle 4: Require transparency and accountability in process and outcomes. Information about each stage of the Lifeline and CBTP process should be publicly available and accessible by low-income and underserved residents. This will enable community oversight in accordance with Principles 1 through 3 and provide a mechanism for agency reflection, accountability, and improvement.

Principle 5: Build relationships between residents and government. A more participatory Lifeline program will bring community residents, CBOs, and local and regional government staff together in ways that deepen trust and the practice of democracy.

¹ Metropolitan Transportation Commission. *Lifeline Transportation Program Cycle 4 Guidelines*, at p.3.

² Metropolitan Transportation Commission. *Community-based Transportation Planning Program Guidelines*, at p.1.

Specific Recommendations

We are pleased to see that MTC is updating guidelines for both programs to encourage and incentivize congestion management agencies (CMAs) and other relevant stakeholders to adopt a Participatory Budgeting (PB) process for implementing the two programs. (MTC should include an appendix outlining how the PB process can be used for each program as we have proposed.) For those CMAs that do not use PB, we recommend that MTC adopt the following key recommendations – please see our Proposal for a more complete discussion of all recommendations:

Lifeline Guidelines

1. **Community Engagement Plan.** Require CMAs to adopt and implement a Community Engagement Plan with at least 3 best practices that will result in maximum participation and leadership by low-income residents and CBOs that work with these residents. (See language we have proposed in Appendix 2 (Section d) of the current Lifeline guidelines.)
2. **Community Prioritization.** Require CMAs to prioritize for funding projects ranked highest by low-income residents in CBTPs or through other equivalent local planning that have been completed within the past five years. (See proposed language in Appendix 2 (Section b).)³
3. **Reporting Requirements.** Require CMAs to report on performance metrics for each project, in particular whether the project has primarily resulted in mobility or transportation access for low-income people, as well as the specific proportion of project beneficiaries that are low-income. Community engagement plans and funding reports should be posted on MTC and CMA websites. (See proposed language in Sections 16, Appendix 2 (Section e), and a new section on reporting requirements.)

CBTP Guidelines

1. **Consultants must be CBOs and/or non-profit organizations.** Require CMAs to conduct CBTP planning in partnership with CBOs and/or non-profits that work with low-income and other underserved residents as consultants, and to prioritize contracts with CBOs and/or non-profits (as opposed to for-profit consultants). CBOs should receive funding for participating in the planning process. The 10% of CBTP planning funding that MTC proposes to set aside for community engagement should be reserved for CBOs that work directly with low-income and other underserved residents. (See proposed language in Sections 4 and 6 of the 2002 CBTP guidelines.)
2. **Steering Committee.** Require CMAs to work with CBOs and/or non-profits to establish a Steering Committee to design and oversee a collaborative CBTP planning process. The majority of Steering Committee members must be low-income and other underserved residents, and CBOs that work with these residents. (See proposed language in Sec. 8.)
3. **Community Engagement Plan.** Parties responsible for CBTP planning must adopt a Community Engagement Plan with a minimum of 3 best practices for involving low-income residents and CBOs that work with these residents. The Community Engagement Plan must include a process for ranking low-income and other underserved residents' needs, and prioritize associated project into tiers based on the needs identified by these residents. (See proposed language in Sec. 8.)
4. **Action Plan.** Require CMAs to create an action plan for implementing all projects within five years of the completion of CBTPs. The action plan should include specific implementation timelines and a list of viable funding sources for each project identified to have the highest priority level. (See proposed language in Section 8, in particular the paragraph on the primary elements of a CBTP.)

³ In addition, the project selection criteria on project goals, community-identified priority, and community engagement criteria must have greater weight in Lifeline project selection than the management capacity, cost-effectiveness, and project budget criteria. (See language we have proposed in Section 11 and Appendix 2.)

Attachment: List of Funded and Completed CBTPs

	<i>Community of Concern</i>	<i>County CMA</i>	<i>Year Funded</i>	<i>Amount</i>	<i>Year Completed</i>
1	Ashland/Cherryland	ACTC	2002-01	\$60,000	2004
2	Richmond/San Pablo	CCTA	2002-01	\$60,000	2004
3	Napa	NVTA	2002-01	\$60,000	2004
4	East Palo Alto	C/CAG	2002-01	\$60,000	2004
5	Dixon	STA	2002-01	\$60,000	2004
6	West Oakland	ACTC	2004-05	\$60,000	2007
7	Monument Corridor Concord	CCTA	2004-05	\$60,000	2007
8	Canal District/San Rafael	TAM	2004-05	\$60,000	2007
9	Gilroy	VTA	2004-05	\$60,000	2007
10	South/West Berkeley	ACTC	2004-05	\$60,000	2007
11	East Oakland	ACTC	2004-05	\$60,000	2007
12	Pittsburg/Bay Point	CCTA	2004-05	\$60,000	2007
13	Tenderloin/Little Saigon	SFCTA	2004-05	\$60,000	2007
14	Mission/Geneva	SFCTA	2004-05	\$60,000	2007
15	Roseland-Santa Rosa	SCTA	2004-05	\$60,000	2007
16	Daly City/Bayshore	C/CAG	2004-05	\$60,000	2008
17	Cordelia	STA	2004-05	\$60,000	2008
18	Vallejo	STA	2004-05	\$60,000	2008
19	Downtown Martinez	CCTA	2004-05	\$60,000	2009
20	Marin City	TAM	2004-05	\$60,000	2009
21	Milpitas	VTA	2004-05	\$60,000	2009
22	East San Jose	VTA	2004-05	\$60,000	2009
23	Bayview/Hunters Point	SFCTA	2004-05	\$60,000	2010
24	Alameda	ACTC	2008-09	\$60,000	2009
25	Southwest Healdsburg	SCTA	2008-09	\$60,000	2009
26	Guerneville/Monte Rio	SCTA	2008-09	\$60,000	2009
27	North Vacaville	STA	2008-09	\$60,000	2010
28	Central Sonoma Valley	SCTA	2008-09	\$60,000	2010
29	North Central San Mateo	C/CAG	2008-09	\$60,000	2011
30	South of Market	SFCTA	2008-09	\$60,000	2012
31	S. San Francisco/San Bruno	C/CAG	2008-09	\$60,000	2012
32	Central/East Fairfield	STA	2008-09	\$60,000	2012
33	Alviso/Shoreline/Sunnyvale	VTA	2008-09	\$60,000	2013
34	Potrero Hill/Inner Mission	SFCTA	2008-09	\$60,000	2015
35	Chinatown/North Beach/Treasure Island	SFCTA	2008-09	\$60,000	2015
36	Novato ¹	TAM	-	\$0	2015
37	Rodeo/Crockett/Hercules	CCTA	2008-09	\$60,000	2017
38	Western Addition/Fillmore	SFCTA	2008-09	\$60,000	2017
39	East Santa Clara	VTA	2008-09	\$60,000	2019
40	East Brentwood	CCTA	2008-09	\$60,000	Not started
41	Mountain View	VTA	2008-09	\$60,000	Not started
42	South San Jose/Morgan Hill	VTA	2008-09	\$60,000	Not started
			Total	\$2.6 M	

¹ Funded by TAM through OBAG. Not an MTC-designated CoC.

Date: January 24, 2018
W.I.: 1311
Referred by: Planning

ABSTRACT

Resolution No. 4316

This Resolution adopts program guidelines for the 2017-2021 cycle of the Community-based Transportation Planning Program.

Date: January 24, 2018
W.I.: 1311
Referred by: Planning

RE: Community-based Transportation Planning Program Guidelines - 2017-2021 Cycle

METROPOLITAN TRANSPORTATION COMMISSION
RESOLUTION NO. 4316

WHEREAS, the Metropolitan Transportation Commission (MTC) is the regional transportation agency for the San Francisco Bay Area pursuant to Government Code Section 66500 *et seq.*; and

WHEREAS, the Lifeline Transportation Network and the Environmental Justice Reports as components of the 2001 Regional Transportation Plan, identify transit needs in economically disadvantaged communities throughout the San Francisco Bay Area and recommend the initiation of community-based transportation planning as a first step to address them; and

WHEREAS, MTC established guidelines to launch and implement the Community-based Transportation Planning (CBTP) Program in 2002 in response to the recommendations outlined in the Lifeline Transportation Network and the Environmental Justice Report; and

WHEREAS, the CBTP Program has provided roughly \$2.5 million in funding for over 40 collaborative planning processes in low-income communities¹ across the region since 2002; and

WHEREAS, lessons learned through the CBTP Program since the guidelines were first established in 2002 warrant updating the guidelines in advance of a new CBTP funding cycle; now therefore be it

RESOLVED, that MTC approves the guidelines for the 2017-2021 cycle of the CBTP Program, as set forth in Attachment A of this Resolution; and be it further

RESOLVED, that Attachment A of this Resolution may be amended from time to time.

¹ MTC defined low-income communities as Communities of Concern even though the CoCs are identified using many other factors such as race/ethnicity, age (over 65 years), disability, rent burden, linguistic isolation, and vehicle ownership.

METROPOLITAN TRANSPORTATION COMMISSION

Jake Mackenzie, Chair

The above resolution was adopted by the
Metropolitan Transportation Commission
at a regular meeting of the Commission held
in San Francisco, California, on January 24, 2018.

Community-Based Transportation Planning Program Guidelines - 2017-2021 Cycle

The following guidelines shall apply to the 2017-2021 Community-Based Transportation Planning (CBTP) Program:

1. **Program Goals** – in developing the CBTPs, the County Congestion Management Agencies (CMAs) must address the following two goals of the regional program:
 - Improve access and mobility for low-income communities, for commute as well as non-commute trips; and
 - Engage residents and community organizations in conducting the analysis and shaping the recommendations.

In addition, CMAs are encouraged to consider non-traditional solutions to meet travel needs of low-income communities. Non-traditional solutions may include car share, bike share, ride-sharing, van- and/or car-pooling, and on-demand, flex-route transit, among others.

2. **Funding allocation** – each county shall receive a CBTP planning grant based on its share of the region’s low-income population² (U.S. Census American Community Survey, 2015). The grants shall be limited to a maximum funding amount equal to 20 percent of the total funds, or \$300,000, and a minimum of \$75,000. The total funding available for the CBTP program is \$1.5 million through the second round of the One Bay Area Grant Program (OBAG 2.0). Of this total, \$35,000 shall be set aside by MTC for conducting a program evaluation in 2021. County allocations are laid out in the table below.

Table 1: Proposed CBTP Funding Allocation

County	Population – Low-Income Share	Low-Income – Share in Region	Low-Income Population	Funding Proportional to Low-Income Population	Adjusted CBTP Grants (max. \$300,000 and min. \$75,000 per county)	
Alameda	27%	23%	426,642	\$337,987	\$300,000	20%
Contra Costa	25%	15%	272,721	\$216,051	\$215,000	14%
Marin	20%	3%	49,052	\$38,859	\$75,000	5%
Napa	28%	2%	38,553	\$30,542	\$75,000	5%
San Francisco	27%	12%	225,756	\$178,845	\$175,000	12%
San Mateo	21%	8%	155,274	\$123,009	\$120,000	8%
Santa Clara	23%	22%	415,848	\$329,436	\$300,000	20%
Solano	30%	7%	122,735	\$97,231	\$95,000	6%
Sonoma	29%	8%	142,693	\$113,042	\$110,000	7%
Bay Area	25%	100%	1,849,272	\$1,465,000	\$1,465,000	100%

Source: U.S. Census American Community Survey, 2011-2015, 5-year average, MTC analysis

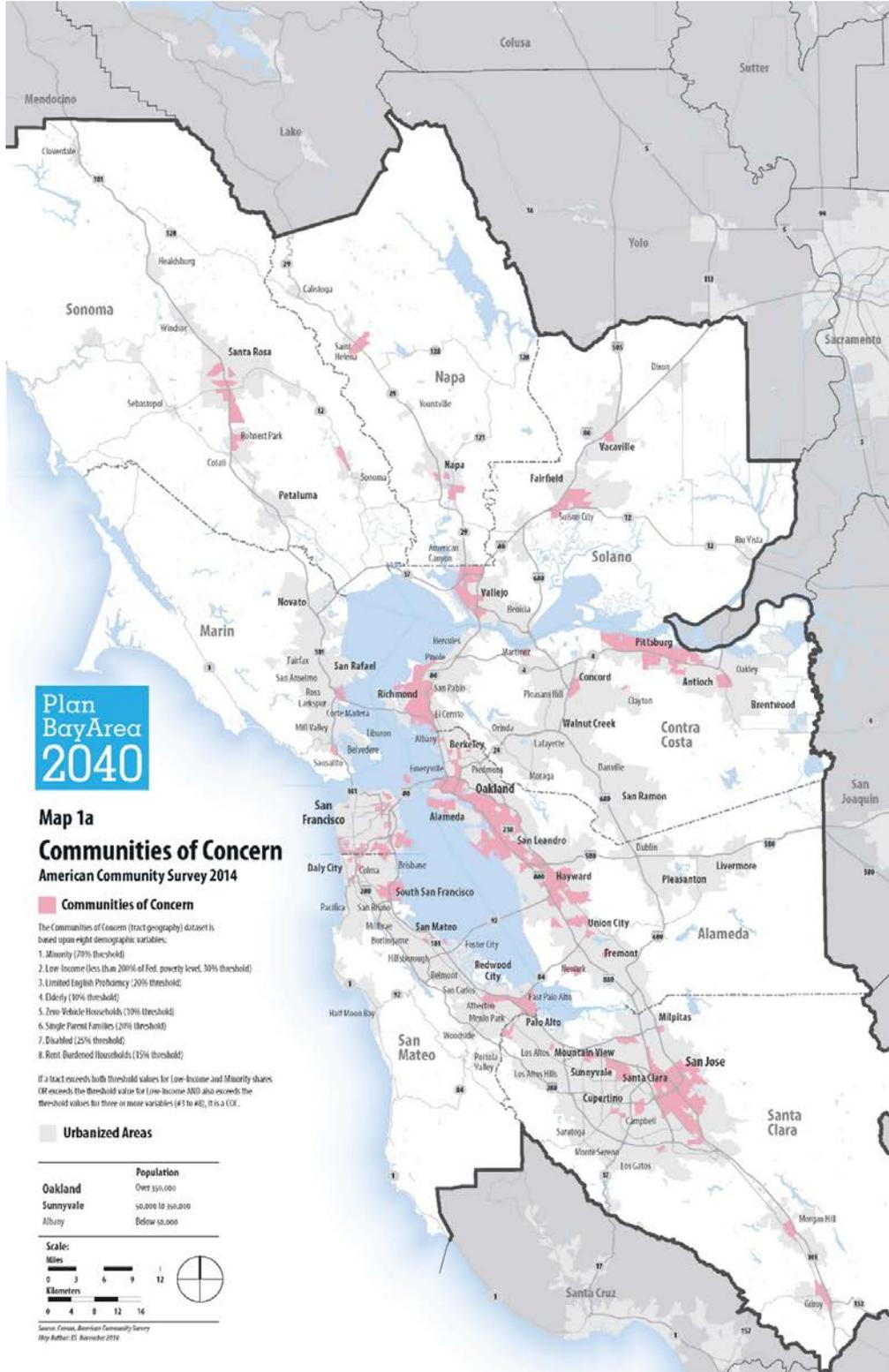
² Population in households earning less than 200 percent of the federal poverty level in 2015.

3. ***Coordination with other planning efforts*** – CMAs may combine CBTPs for more than one CoC, or develop a countywide plan for all CoCs. CBTPs may be developed as part of an existing planning effort (for e.g., planning for Priority Development Areas, county-wide investment and growth strategy, county-wide transportation program, or local jurisdiction general or specific plan). All program guidelines for the 2017-2021 CBTP Program shall still apply to the CBTP component of these planning efforts. If developing standalone CBTPs per CoC, CMAs may spend no more than \$100,000 of the planning grant on each plan.
4. ***Steering Committee*** - CMAs must establish a steering committee that includes social service agency and CBO and/or non-profit representatives to ensure a collaborative and inclusive CBTP planning process.
5. ***Use it or lose it provision*** – CMAs shall administer the CBTP program and must initiate the planning process for each plan within nine months of executing a grant agreement (or MoU amendment) with MTC, and adopt the plan within three years of initiating the planning process. Any funds not used within this time period shall be repurposed by MTC at its discretion for other CBTPs.
6. ***Local match*** – CMAs must provide a ten percent match for the CBTP planning grants, which may be in the form of in-kind staff time (source of CBTP funding is the State Transit Assistance program).
7. ***Incentives for community engagement*** – CMAs are highly encouraged to set aside up to 10 percent of the planning grant towards direct financial support to local community-based organizations (CBOs). This funding may be used by the CBO(s) to provide services (for e.g., translation, outreach or meeting coordination) and/or to participate in the planning process (for e.g., as stipends).
8. ***Eligible uses*** – eligible uses for CBTP planning grants include, consultant services, direct costs or stipends associated with plan development and adoption, stakeholders engagement, and, if applicable, an implementation plan. The individual plans must be developed for MTC-designated CoCs (see map of CoCs below). CMAs may designate additional transportation disadvantaged areas (TDAs), which would also be eligible for CBTP planning grants after consideration and approval by MTC staff. The criteria for identifying additional TDAs must include at least one of the following three demographic characteristic: income, age (youth or seniors) and disability. In the North Bay, CMAs may designate areas affected by recent wildfires as a TDA. CMAs must designate TDAs before executing a grant agreement (or MoU amendment) with MTC.
9. ***Prioritizing planning areas*** – CMAs are encouraged to prioritize CBTPs for areas that do not currently have a plan, areas where the plan is more than 5 years old, and areas that have the highest concentration of low-income populations.
10. ***Key components and deliverables*** – CBTPs must include key components and deliverables identified in Table 2 below. Some components may be rolled into a broader effort (for e.g., outreach and engagement for a general plan update could count towards component A.). All components may or may not be completed at the same scale (for e.g., a countywide baseline conditions analysis and needs assessment for all CoCs may be followed by separate recommendations for each CoC).

Table 2: Key Components and Deliverables for CBTP Plans

<i>Plan Components</i>	<i>Guidance and Description</i>
<i>A. Outreach and Engagement</i>	Identify key stakeholders (for e.g., partner agencies, CBOs and disadvantaged/ under-represented populations), describe outreach activities (for e.g., interviews, workshops, forums, focus groups, surveys, and polls), develop multi-lingual collateral materials (for e.g., newsletters, flyers, and website), and document residents and community feedback.
<i>B. Baseline Conditions</i>	Create a map of the planning area (showing community facilities and amenities, major transportation infrastructure, regional context, CoCs, and if applicable TDAs), summarize demographic characteristics (current conditions and recent trends, if relevant), document existing transportation services (by mode, spatial distribution and temporal characteristics), etc.
<i>C. Needs Assessment</i>	Identify key local, sub-regional and regional destinations for residents and workers in CoCs and TDAs (for e.g., job centers, medical and community facilities, grocery stores, etc.), gaps in existing transportation services and infrastructure to access these destinations, and barriers to filling these gaps, etc.
<i>D. Recommendations</i>	Identify potential solutions, innovative approaches, or best practices from other regions; address the role of emerging technologies; and develop a prioritized list of initiatives, projects and/or programs, etc.
<i>E. Implementation</i>	Develop an implementation plan for key recommendations, as needed.
<i>F. Monitoring and Evaluation</i>	Develop a process and institute a mechanism to track progress and funding provided for implementation (for each initiative, project and/or program), establish monitoring protocols, etc.

Plan Bay Area 2040 Communities of Concern Map



An aerial topographic map of a region, likely a valley or basin, showing a river winding through the landscape. The terrain is shaded in various tones of blue and grey, indicating elevation changes. Urban areas are visible as clusters of small, light-colored shapes. The map is oriented vertically, with the river flowing from the top right towards the bottom left.

Community-Based Transportation Planning Program

Planning Committee

January 12, 2018

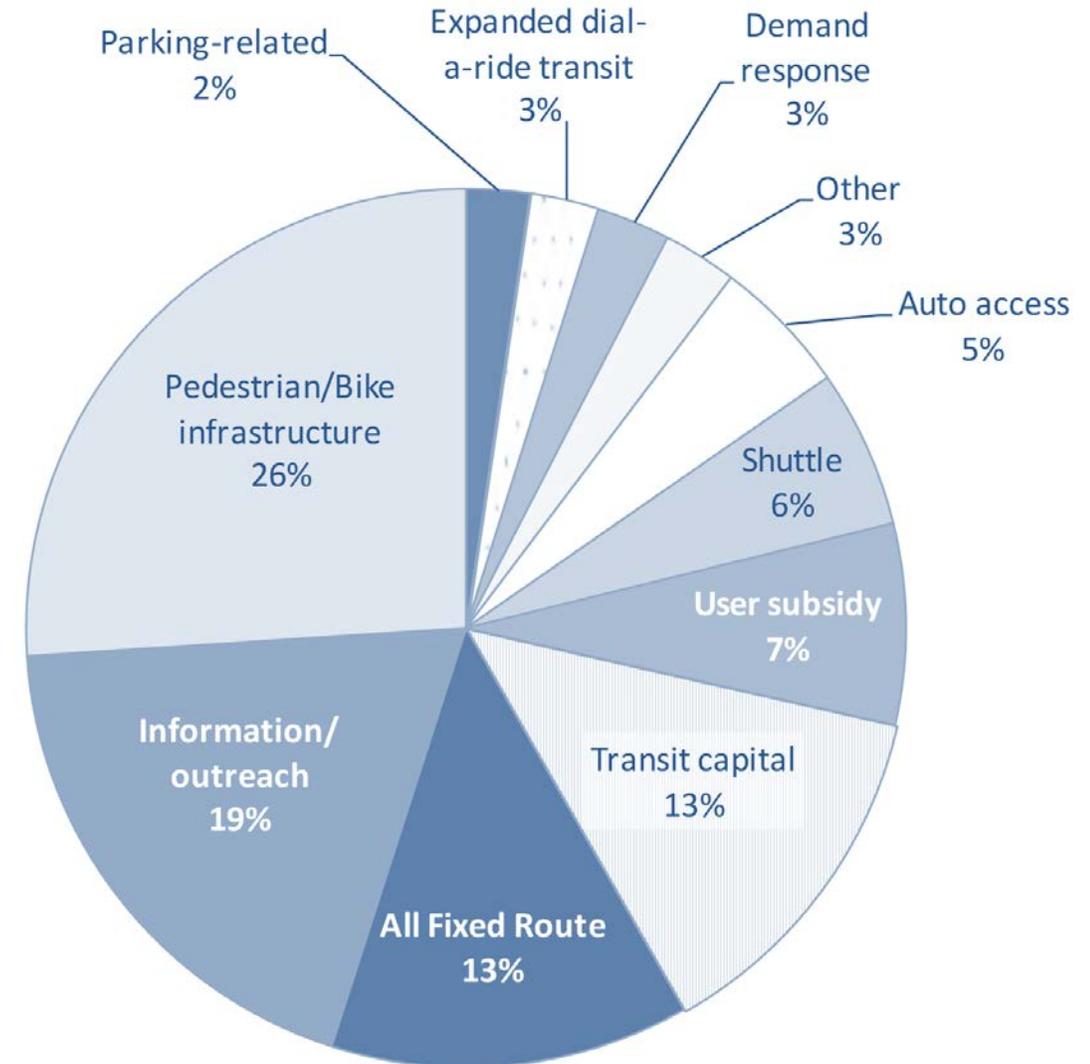
Background

- Established in 2002 along with the Lifeline Transportation Program.
- Funds planning in MTC-designated Communities of Concern.
- Emphasizes meaningful community outreach and engagement.
- Identifies projects/programs that improve access and mobility for low-income residents.
- Administered by CMAs.



Accomplishments

- Funded plans in over 40 communities, with approximately \$2.6 million in grants.
- Improved understanding of access and mobility needs of low-income residents.
- Built capacity among partners to plan for and deliver improved services.
- Informed funding allocation for the Lifeline Transportation Program.



Areas for Improvement

- *Funding* – the program provided \$60,000 per plan though most cost more than \$75,000.
- *Flexibility* – CMAs/cities were not able to integrate CBTPs into local planning initiatives such as PDA plans.
- *Resident Engagement* – community-based organizations could have played a stronger role in outreach activities.
- *Defining CoCs* – CMAs were not able to designate additional disadvantaged communities to reflect local conditions.
- *Understanding Needs* – some CBTPs did not tackle the broader access and mobility needs of low-income residents.
- *Timeline* – six plans took more than five years to complete while three have not yet started.
- *Tracking Implementation* – county plans only reference CBTPs.

Updated Guidelines

- Clearer and simpler program goals;
- Flexibility to coordinate with other planning efforts;
- Flexibility to combine CBTPs across multiple CoCs;
- Steering committee to include social service and CBO/non-profit representation;
- Use it or lose it provision;
- 10 percent local match requirement;
- 10 percent set aside for community engagement;
- Ability to designate additional disadvantaged areas after consideration and approval by MTC (including fire-affected areas in the North Bay);
- Commitment to regularly update the needs assessment component; and
- Commitment to track project/program implementation.



Source: East Bay Times



Source: Safe Routes to School, Marin

Funding Allocation

County	Population – Low-Income Share	Low-Income – Share in Region	Low-Income Population	Funding Proportional to Low-Income Population	Adjusted Grants (max. \$300,000 and min. \$75,000)	
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Source: U.S. Census American Community Survey, 2011-2015, 5-year average, MTC analysis

Next Steps

<i>Milestones</i>	<i>Timeline</i>
Programming and Allocations Committee considers Lifeline Transportation program	January 10, 2018
Planning Committee (review)	January 12, 2018
MTC Commission (approval) (also related Lifeline Transportation Program)	January 24, 2018
Funding Available (per OBAG 2)	October 2018
Anticipated Start Date	January 2019
Anticipated Completion Date	December 2020

