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Ohio House Finance Committee House Bill 23

Interested Party Testimony
February 21 and 22, 2023

Northeast Ohio Areawide Coordinating Agency (NOACA) Grace Gallucci, Executive Director and CEO

Chair Edwards, Vice Chair LaRe, Ranking Member Sweeney and members of the Ohio House Finance Committee – thank you for the opportunity to submit written testimony on House Bill 23, the state’s transportation budget.

I am the Executive Director and CEO of the Northeast Ohio Areawide Coordinating Agency (NOACA), the federally designated metropolitan planning organization (MPO) that conducts transportation and environmental planning for Cuyahoga, Geauga, Lake, Lorain, and Medina Counties. On behalf of NOACA, I appreciate the opportunity to submit written testimony expressing our concerns about several items:

- Language prohibiting a bicycle lane in the middle of a street or highway in a municipality with a population of more than 300,000 residents
- Language requiring that interstate highway interchanges exist every 4.5 miles with regard to adjacent municipal corporations meeting specific population characteristics
- Language creating the Rural Highway Fund and transferring \$1 billion into the fund (with 80% used to finance projects on rural state highways and 20% designated for local governments as local matching funds for TRAC eligibility)
- Language ensuring that any loan to a municipal corporation eligible for Ohio Department of Transportation’s (ODOT’s) Small Cities Program, from the State Infrastructure Bank, must be a zero-interest loan.

While NOACA would welcome additional ODOT guidance and best practices on bicycle infrastructure, we have concerns about a stringent regulatory approach that denies local citizens and local officials the ability to make decisions in the best interest of their communities. In particular, this provision appears to jeopardize the Superior Midway project in the City of Cleveland. My agency, NOACA, has facilitated planning and provided substantial funding to advance this project over the course of many years, with input from the City of Cleveland, local residents, local business interests, and local bicycle organizations. The Superior Midway project is included in NOACA’s federally-mandated Long Range Plan, eNEO2050, and the region’s Transportation Improvement Program (TIP) – both of which are the result of many hours of public engagement and consensus-building throughout Northeast Ohio. Local governments, by their very nature, are in the best position to assess the needs of their communities.

NOACA also has concerns about language requiring the existence of interstate highway interchanges among certain adjacent communities, and believes this approach infringes on the decision-making authority of local elected officials. MPOs, like NOACA, were established by federal law to enable consensus-building among communities and local elected officials in order to facilitate a regional approach to transportation planning and funding, and to address needs that are specific to a given region. The proposed language would appear to attempt to overrule this consensus-based approach, as

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established under federal law. This language instead prescribes a specific outcome based on very specific metrics. In fact, the language would appear to circumvent processes that already exist, including ODOT and Federal Highway Administration (FHWA) requirements that an Interchange Justification Study be completed prior to the development of new interstate highway interchanges, as well as NOACA's Board-adopted interchange policy.

Thirdly, NOACA has concerns about language creating the Rural Highway Fund and transferring \$1 billion into the fund (with 80% used to finance projects on rural state highways and 20% designated for local governments as local matching funds for TRAC eligibility). NOACA represents urban, suburban, and rural communities, and believes that they must be treated with fairness. Urban, suburban, and rural interstates are all important components of the state interstate system, and no specific funds should be designated for any particular part of this system. If anything, an equitable system would simply use vehicle miles traveled (VMT) to allocate funding for all interstates, regardless of location. And if there's a particular need in a specific place, ODOT already has the means and mechanisms to address any situations or needs that might arise.

Finally, NOACA is concerned about language that proposes zero-interest loans from the State Infrastructure Bank would be available to municipal corporations eligible for ODOT's Small Cities Program – those with populations from 5,000 to 24,999 that are not located within a MPO's boundaries. NOACA believes there is no compelling reason to provide special consideration to these cities that is not also available to all Ohio cities (and other government entities such as port authorities, metro park districts, transit authorities, counties, and townships) that may also use the State Infrastructure Bank. NOACA represents governmental jurisdictions of all shapes and sizes. In the interest of fairness, NOACA believes that all governmental jurisdictions should be entitled to equal treatment with regard to loan programs.

Thank you for your consideration of this testimony; I appreciate the opportunity to testify on behalf of NOACA