



SAN FRANCISCO
PLANNING DEPARTMENT

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Subject: San Francisco Comments on Draft Plan Bay Area

Dear Ken and Miriam:

Congratulations on this important milestone in the release of Plan Bay Area, the Bay Area's first combined Sustainable Communities Strategy/Regional Transportation Plan as required under Senate Bill 375 (SB 375). The Plan is an important step in transforming the Bay Area into the livable and sustainable region we aspire it to be, and we wish to thank you and your staff for an inclusive process and strong plan.

As the plan approaches adoption in July, we offer the following comments, including the aspects of Plan Bay Area that San Francisco is most appreciative of being included in the plan, as well as discussion of forward-looking actions that San Francisco wishes to partner with the region on in implementing Plan Bay Area.

- **San Francisco is grateful for commitment of regional discretionary revenue to several transportation project and program investments, which are identified as high-performers in the plan and/or are critical to improving transportation and land use coordination.** These include:
 - ***Naming of the Downtown Extension of Caltrain and Van Ness Bus Rapid Transit as among the region's next New Starts and Small Starts priorities, respectively.*** These projects were both identified as high-performers by the region and exemplify the type of projects that achieve SB 375 goals. We also note San Francisco has other candidate projects for these fund sources and encourage the region to give greater weight to performance relative to the Federal Transit Administration's criteria over geographic equity in considering future regional priorities for New or Small Starts given the intense national competition for these limited discretionary funds.

- ***Committing discretionary revenue to seven high-performing projects that would benefit San Francisco and the region (i.e. BART Metro Program, Treasure Island Congestion Pricing, Downtown Congestion Pricing Pilot, Transit Effectiveness Project, Caltrain Service Frequency Improvements and Electrification, Van Ness Bus Rapid Transit, and Better Market Street).*** The performance-based approach of the plan is a sound one to ensure the region invests cost effectively given limited resources, and we look forward to partnering with the region in advancing these local priorities that will help achieve both local and regional goals.
- ***Creation of the OneBayArea Block Grant Program that ties transportation investment to housing and affordable housing production and planning.*** According to Plan Bay Area, San Francisco is expected to grow by more than 92,000 housing units and 190,000 jobs by 2040. We are very supportive of this effort to tie transportation funding to good land use planning and affordable housing policies, and thank MTC and ABAG for advancing it through Plan Bay Area.
- ***Commitment of \$500 million to the Transit Performance Initiative,*** the first-ever equivalent to the regional Freeway Performance Initiative created during the 2035 Regional Transportation Plan.
- **San Francisco wishes to partner with the region in implementing regional programs:**
 - ***Transit Performance Initiative:*** San Francisco stands out among the top two cities for both amount of housing and job growth expected in Plan Bay Area by 2040, and San Francisco's transit mode share is already outstandingly high relative to the region (according to the American Community Survey 34% of San Franciscans commute by transit as compared to a Bay Area average of 10%, and a similar differential exists for non-commute trips). Transit crowding is a well-known issue today in San Francisco, in particular for Muni and BART service, and the amount of growth expected would exacerbate this issue. As a result, we are supportive of the Transit Performance Initiative program with its goal of better leveraging the substantial investment in our existing core transit infrastructure, and encourage MTC to work with San Francisco and other core cities to begin planning work to develop a strong pipeline of Transit Performance Initiative projects to address this need.
 - ***Freeway Performance Initiative:*** Historically, San Francisco has not been included in the regional Freeway Performance Initiative, yet San Francisco's freeways (I-80, US 101, I-280, Central Freeway) experience notable congestion and would also benefit from investments to better manage the existing capacity. While the type of interventions may be somewhat different for San Francisco (e.g. they may focus on closing or re-purposing closely spaced on-/off-ramps for transit/carpools rather than ramp metering), we feel this "flavor" of a more multi-modal-focused intervention that balances freeway and local arterial performance is applicable to the Freeway Performance Initiative and wish to partner with MTC in studying these efforts such as through the San Francisco freeway performance initiative study recently proposed for funding via a Caltrans Planning Grant.

- ***Climate Investment Strategy:*** We are supportive of the commitment to continue funding the innovative climate grant program. San Francisco is making good progress implementing projects funded through the first round of this program and is excited to learn lessons of success from projects advanced around the region. We note that many aspects of the proposed climate investment strategy have not benefited from much discussion at the regional level in terms of the methodology used to estimate their effectiveness, cost effectiveness, or program scope details. This is particularly relevant to the clean vehicles feebate, the smart driving strategy, the vehicle buy-back and plug-in or electric vehicle purchase incentives, and regional electric vehicle charger network. We encourage the region to provide ample time to discuss these programs in greater detail before programming funding to them. While technology improvements are an important aspect of meeting the regional greenhouse gas reduction goals, it is important to weigh what the appropriate public versus private sector role should be in advancing and sustaining these strategies, in particular considering that these strategies do not provide the same co-benefits (e.g. congestion reduction, public health benefits, safety benefits) as demand management strategies.

- **San Francisco wishes to partner with the region on legislative advocacy to support Plan Bay Area implementation.** Of particular importance for the city are:
 - **Authorizing a successor tax increment financing tool to replace the loss of redevelopment.** In San Francisco, former redevelopment areas such as the Schlage Lock development site have experienced a tremendous setback as a result of the loss of redevelopment. A replacement funding mechanism is essential if San Francisco is to achieve the housing goals detailed in Plan Bay Area and our own existing plans.

 - **Authorizing new sources of transportation revenue at the federal, state, regional and local levels.** San Francisco, and the region as a whole, have significant funding shortfalls remaining. Of particular concern and importance is the longstanding backlog in state of good repair and transit operations needs. After Plan Bay Area investments, we estimate our shortfall in San Francisco for these needs at over \$6 billion.

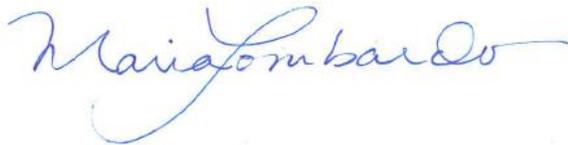
- **Going forward, San Francisco urges the region to continue to tightly link land use and transportation policy, to expand its efforts to mitigate risk of displacement, and to further develop the region's pricing initiatives.**
 - We commend MTC and ABAG on this Sustainable Communities Strategy which focuses two thirds of the region's growth in transit-oriented Priority Development Areas, and which commits federal transportation funds to support these plans through the OneBayArea Grant program. We do remain concerned about the Plan's equity performance and the issue of displacement risk, however. This issue is of particular concern to San Francisco, where the city's Priority Development Areas largely overlap with the city's Communities of Concern. We appreciate the work underway through the Regional Prosperity Plan and encourage the region to continue pursuing tools and policies on this front, and to engage local jurisdictions in

the process. These efforts also include development of the Lifeline program and working toward greater transit service provision and coordinated fare policies in the region.

- San Francisco appreciates the region's support for our proposed pricing program and we recognize that our success in realizing these plans relies on partnerships with the state and region. We also look forward to greater participation in the development of the regional Express Lane network and freeway management policy, as we embark on a visioning process for the freeways that traverse San Francisco. While the pricing definition of the Environment, Equity, and Jobs scenario was a nominal one cent vehicle miles travelled fee, we do think it is important for the region to continue study of pricing as a demand management tool in future corridor-wide and region-wide planning efforts..

We thank MTC and ABAG for the opportunity to provide comments on the Draft Plan Bay Area and look forward to partnering on implementation.

Sincerely,



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cc: Commissioners Campos, Cohen, Halsted, Mar, Wiener
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