



SAN FRANCISCO
PLANNING DEPARTMENT

SFMTA | Municipal Transportation Agency

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Subject: San Francisco Comments on Initial Vision Scenario and Alternative Scenarios

Dear Doug and Ken:

We appreciate the important work that you and your colleagues undertook to develop the Initial Vision Scenario (IVS) for the Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), and for presenting that work to our City leaders and our community. We are writing to offer the following comments on this and the next phase of RTP/SCS work, the analysis of the Alternative Scenarios.

- 1. The IVS's growth allocation for San Francisco is ambitious, and will require policy discussion as well as significant regional discretionary funding to realize.** While San Francisco is supportive of this pioneering and ambitious regional planning effort, the region should not take for granted the significant level of growth that is planned for San Francisco. In order to accommodate the transportation impacts of planned growth, San Francisco needs a greater share of regional discretionary funding than we have received historically. In order to address other related impacts of growth on existing communities, San Francisco requires planning and policy support to ensure open space, child care, neighborhood services, community stability, quality of life, and other community needs. Our ability to accommodate more growth depends heavily on the support that the region provides, and will require creative identification of additional sources of transportation funding and new non-transportation funding sources. We look forward to working with you to identify and quantify these necessary funds.
- 2. The region should advance discussion of a funding program that incentivizes sustainable and equitable growth.** We are pleased to learn that MTC and ABAG are developing a Sustainability Block Grant proposal to support implementation of the SCS. We thank you for beginning this discussion of how regional transportation funding policy might be linked with regional land use policy. We offer the following factors as ones that should

underpin any mechanism that distributes regional transportation funding within the region:

- **Nexus with transit system demand:** In San Francisco and other core urban areas where demand is high, significant investment in transit capital and operations is needed, both to maintain the infrastructure in a state of good repair and to accommodate additional demand.
- **Nexus with scale and quality of Priority Development Areas:** As we have said before, all PDAs are not created equally. PDA Assessment work must consider the overall amount of growth being planned, how much of that growth is affordable housing, the level of transportation and transit development, and the amount of local contribution, such as local and private matching investment.
- **Nexus with affordable housing production:** This principle should consider a jurisdiction's track record for affordable housing development and preservation, and/or the number of lower income housing units that is planned. It could also consider the policies the jurisdiction has put in place that indicate a higher likelihood of meeting affordable housing goals, such as inclusionary zoning.
- **Nexus with performance:** Since the goal of the block grant program is to help achieve the performance targets for the RTP/SCS, performance and cost-effectiveness should be incorporated into the expectations set for local agencies, and include clear regional expectations regarding local programming decisions as well as a robust monitoring and evaluation plan.

3. The land use distribution in each Alternative Scenario should consider growth (and the transportation investments to support them) according to equity principles. There is a perceived tension between land use distributions that arrange future development to minimize greenhouse gas emissions, and those that comply with "fair share" principles of requiring all communities to provide housing to serve all income levels. However, we believe refinements from current regional plans can improve on both outcomes. Equity outcomes can be improved by:

- Prioritizing a housing distribution that results in increased income diversity among multiple Bay Area place types, and not just in the most urbanized areas;
- Prioritizing growth in low crime areas to improve public health. Areas with high crime rates tend to have higher death rates, and higher overall linkages to ill-health; and
- Linking housing distributions, particularly affordable housing distributions, to "complete communities;" i.e. those places with amenities such as high quality transit and other transportation options, high quality schools, and accessible neighborhood services.

We would note this requires that the discussion regarding distribution of housing by income level begin concurrent to Alternative Scenario development, rather than after a RTP/SCS Preferred Scenario is selected in November 2011, as currently proposed.

In addition, we encourage the region to focus on improving outcomes for low-income

households, for all Alternative Scenarios, in particular for performance target areas where the initial IVS Equity Analysis indicates that low-income households do not experience the same level of benefit as high-income households, such as transportation affordability. We request additional information on the IVS Equity Analysis of performance target outcomes for low-income vs. high-income households and Communities of Concern.

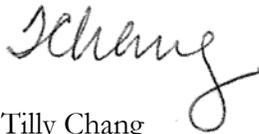
4. **Identify the affordable housing public investment shortfall in each of the Alternative Scenarios.** There is widespread recognition that without new sources of public subsidy or financing mechanisms for affordable housing, the region will be unable to house the region's entire population by income level. Absent new funding mechanisms, the region risks overestimating our anticipated progress towards GHG emission reductions and equity outcomes. Therefore, we suggest that to accompany the Alternative Scenarios, the region develop an estimate of the public investment cost, and the anticipated stream of public funds that are available to support affordable housing over the next 25 years. In this way, the first SCS can identify the difference between the funding need and amount available, to produce the region's stock of affordable housing. This would help frame the effort in a similar way to the "financial constraint" requirement for transportation investments and develop the public awareness needed to seek additional funding to accomplish these goals.
5. **The Alternative Scenario concepts should be defined by first selecting and modeling a land use distribution's transportation impacts, and then pairing the transportation network and policy initiatives that are responsive to that land use distribution.** In short, we believe a corridor-level analysis of alternative land use distributions with a baseline transportation network is necessary to inform development of a supportive transportation network and set of policies for each alternative. We encourage the region to utilize this analytical approach to develop the Alternative Scenarios. Such analysis may reveal the need for a more robust transportation pricing policy in order to achieve reductions in vehicle travel given a more suburban distribution of housing and jobs, or it may reveal the need for a different set of transit expansion projects to complement the "More Urban" scenario than those prioritized in Transportation 2035. We believe this approach is an improvement over the partial "mix and match" exercise proposed. The suggestion to combine reduced intensity of land uses with the Transportation 2035 investment strategy seems particularly unsuitable for meeting SCS goals. Corridor-level analysis is a challenging task to tackle at the regional level, and we are happy to participate actively in analysis of San Francisco corridors. Please see Appendix One for additional detailed comments on the Alternative Scenarios framework and analytical approach.
6. **The Alternative Scenarios should provide a basis for regional advocacy towards new sources of revenue and legislative reforms.** We encourage MTC and ABAG to use the RTP/SCS to advocate for new revenue opportunities, through a vision element that would identify projects and programs beyond resources currently available which would support implementation of the SCS. Of particular interest to San Francisco are: 1) new transportation revenue sources to address chronic transit operating and infrastructure State of Good Repair (SOGR) shortfalls, and 2) stable non-transportation revenue sources to assist in affordable housing production, creating complete communities, and stabilizing communities who are faced with growth. MTC/ABAG should also use the SCS to advance robust funding strategies, including road user fees. We look forward to working with you to

identify and advocate for new legislative and revenue opportunities such as these.

We also encourage the region to champion legislative changes that will facilitate implementation of the SCS, such as preserving and reforming local jurisdiction redevelopment infrastructure financing tools, reducing barriers to affordable housing and transit oriented development projects, expanding use of public-private partnerships, and increasing funding available through the Strategic Growth Council. Of particular importance is the need to harmonize regional initiatives such as the Bay Area Air Quality Management District's CEQA thresholds, and the Bay Conservation and Development Commission's adaptation planning efforts, with the RTP/SCS.

We thank you for the opportunity to provide comments on the IVS and look forward to participating in refinement of the Alternative Scenarios and subsequent phases of the RTP/SCS.

Sincerely,



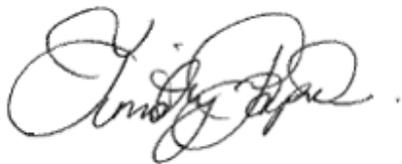
Tilly Chang
Deputy Director for Planning, San Francisco County Transportation Authority



Sarah Dennis Phillips
Acting Director of Citywide Planning, San Francisco Planning Department



Doug Shoemaker
Director, Mayors Office of Housing

A handwritten signature in cursive script, appearing to read "Timothy Papandreou".

Timothy Papandreou
Deputy Director for Planning and Sustainable Streets, San Francisco Municipal Transportation
Agency

Attachments (1)

cc: Commissioners Avalos, Campos, Cohen, Mar, Mirkarimi, Weiner
Kate Howard, Johanna Partin, Mayor's Office
Jean Roggenkamp, BAAQMD
JLM, MEL, AL, RH, AC, ZB, LB, Chron, File: SCS

Attachment 1: Detailed Feedback on Alternative Scenarios Framework and Analytic Approach

We think the three alternative land use distribution framings are on the right track. And, although we find the “Most Urban” framing most aligned with San Francisco priorities, we encourage the region to consider changes to the “More Urban” scenario to improve upon the distribution of growth, which, while more dispersed than “Most Urban” could still concentrate growth more strongly along the regional transit corridors. We recommend the following three-step approach to the Alternative Scenario phase of the Regional Transportation Plan/Sustainable Communities Strategy.

Step 1: Define and Model Alternative Land Use Distributions with a Baseline Transportation Network. For this step, we recommend limiting the baseline transportation network to only those projects that are considered committed and were fully funded by committed funds in Transportation 2035. This will allow the independent impacts of land use on performance targets to be compared across scenarios.

Step 2: Analyze Transportation System Performance at Corridor Level for Each Land Use Scenario. In order to define a transportation network and policy changes responsive to the land use, corridor-level analysis should be undertaken. We recommend defining a limited set of key regional corridors. The two inter-regional corridors of greatest importance to San Francisco include the Transbay corridor (including BART and the Bay Bridge) and the Peninsula corridor (including US 101, I-280, Caltrain, and regional express bus). We suggest considering corridor-level metrics including: total trips by mode, transit crowding, vehicle miles of travel, and the ratio of auto to transit travel time.

Step 3: Design Transportation Network and Policy Initiatives to Address Corridor Performance. Corridor metrics should be used to identify the transportation investments and policies that best advance SCS goals, assuming a given land use distribution. And, to further isolate the effect of transportation capital investments and demand management policies, we propose holding a base level of maintenance investment constant across Scenarios. For example, the land use alternative that shifts employment towards housing located in the Outer Bay, will require different transportation investments and policies depending on whether this pattern generates shorter vs. longer trips, and the mode split of these trips. We also suggest analyzing the research on induced leapfrog development and the potential for shorter trips in the short term to convert to longer trips over time.

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