



SAN FRANCISCO
PLANNING DEPARTMENT

SFMTA | Municipal Transportation Agency

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Subject: Comments on Draft Performance Targets for the Sustainable Communities Strategy

Dear Ted, Doug, and Ken:

Thank you for providing an inclusive process to develop the Draft Sustainable Communities Strategy Performance Targets. We recognize the significant amount of staff effort that is needed to facilitate the Performance Measures Ad Hoc Committee meetings, and appreciate the thorough and transparent process undertaken to consider a large number of potential measures and targets.

The City and County of San Francisco's planning, transportation, housing, and public health agencies agree that the targets generally reflect the right measurement areas, however there are several significant areas where we suggest specific new or modified measures. Most notably:

1. The housing and equity targets are not sufficient to measure the impacts that different scenarios will have in addressing the needs of low-income individuals.
2. We offer more comprehensive measures of transportation system effectiveness, that focus on the number and quality of transportation choices for households, among other considerations.
3. The transportation State of Good Repair (SOGR) targets should be weighted based on demand.
4. The economic vitality target needs a clearer focus that ties it to the overarching objectives

of improving the transportation/land use connection.

5. Targets tied to environmental and health outcomes, such as the targets for PM_{2.5} collisions, and “active transportation” could be improved in several ways.

With these high-level points in mind, we offer the following comments and revisions to the targets.

1. **Modify Target 2 to, “House 100% of the region’s housing need by income level without displacing low-income residents and while increasing opportunities for low-income housing in all areas.”**

We appreciate the modified housing target proposed in the 12/7 Performance Measures ad hoc packet to consider displacement impacts, however we suggest additional modifications to it. Policy decisions that affect housing must be guided by experiences from the past, and must fit within strong legal mandates, such as Fair Housing Law. As place of residence is a strong determinant of access to goods and services, health resources, school quality, employment opportunities, and related socioeconomic outcomes, the SCS should address equity goals at a neighborhood level by improving the opportunities available to people in low-income brackets. With that goal in mind, we suggest modifying the housing target to include reducing geographic disparities by increasing income diversity in predominantly high-income and moderate-income neighborhoods.

2. **Replace Target #3 with “Reduce by X% concentrations of PM_{2.5} without exacerbating geographic disparities in PM_{2.5} concentration within the region”**

We propose shifting the focus of this measure from an exposure-based perspective to a definition based on concentrations. Given the growing recognition of air quality conflicts between busy roadways and infill development, careful consideration should be given to how the measure and methodology will represent trade-offs between regional emissions reductions and local adverse effects. It is also critical that the methodology, measures, and targets be consistent with the BAAQMD CEQA thresholds guidance and other State and Federal regulatory guidance. Specifically, an exposure-based target would necessitate a methodology that factors in the positive impact Community Risk Reduction Plans under development would have in mitigating exposure. In addition, given that the 11 percent reduction in premature deaths used as a numerical basis for the proposed target is contingent on *all* sources of PM_{2.5} being reduced to achieve the economy-wide federal standard, the methodology would require a forecast of emissions from *all* sources of particulate matter. For these reasons, we suggest a concentration-based target is more appropriate for the SCS. In addition, we believe it is more appropriate for the numerical basis for the target to reflect the more stringent State standard for PM_{2.5} rather than the federal standard. Finally, it is also important to avoid any growth in geographic disparities in pollutant exposure. For these reasons, we suggest a target to “reduce by X% particulate matter concentrations”, where X% is the percentage reduction required of the transportation sector to meet the State ambient standard.

3. **Modify Target 4 to, “Reduce by 50% the number of injuries and fatalities from all collisions for each mode of transport” and work to refine the methodology to forecast injuries and fatalities disaggregated by mode.**

Disaggregating by mode is important to avoid shifting the burden of injury and fatality from one mode to another. Focusing on all injuries dilutes safety for the most vulnerable road users.

From an equity perspective, this approach would also be protective of most vulnerable road users, including pedestrians and cyclists, who are also more likely to be low-income, transit dependent populations. The Federal Highway Administration has published recommended methodology for conducting pedestrian injury predictive modeling and there are other published approaches for collision forecasting which incorporate changes in traffic and pedestrian volumes, mode shifts, and non-linear effects. We would be glad to work with the regional agencies to refine the methodology for this target.

4. Replace Target #5 with, “Increase the walk and bicycle mode share for all trips by X%”

We prefer a mode share-based target to a travel time-based target because it is a more direct and intuitive measure of benefit. Recognizing the importance of this target's basis in public health outcomes, we suggest the target's numeric basis be an increase in trips comparable to about 1 non-motorized trip per person per day. Additionally, we are very supportive of MTC/ABAG's intention to complement non-motorized mode share analysis from the model with post-processing to reflect investments that cannot be modeled, such as Safe Routes to School.

5. Add Target #7b, “Increase the share of low, very low, and extremely low income households residing within 45 minutes of their job.”

We are supportive of Target #7, to “Decrease the combined housing and transportation costs of low and lower-middle income individuals,” but believe an additional equity target is necessary to advance the goal of improving opportunities available to very low, low, and moderate income households, including opportunities to live in neighborhoods with easy access to employment as well as resources like quality schools, efficient transportation, safe neighborhoods, and healthy food. We recognize that there is no reliable method to forecast a target that considers access to schools, safe neighborhoods or healthy food; in lieu of that, we suggest that access to employment begins to address this goal area.

6. Replace Target #8 with Targets #8a, “Increase by X% the share of jobs in high quality transit-served locations” and #8b, “Increase by X % share of housing in high quality transit-served areas”

Target #8, as originally proposed, “Increase by 10% the number of workers within 45 minutes of employment centers” could have critically counterproductive measurement outcomes. Absent a drill-down by mode, the target will bias the measure towards prioritizing roadway investments because motor vehicles are usually the fastest mode. This makes the misleading assumption that simply residing near a job center means that the journey-to-work commute will be shorter in such a multi-centric, job-dispersed region as the Bay Area. In addition, we are skeptical that the methodology for the target proposed in the 12/7 ad hoc packet, “Increase gross regional product by X%” will capture tradeoffs between different scenarios' land use distributions and transportation investments/policies. Moreover, it is unclear to what extent land use and transportation policy drive factors important to a region's or sub-region's productivity, compared with business regulations and other quality of life factors. Future SCS's may benefit from some research into this area. In the meantime, we agree that land use and transportation contribute to economic vitality by offering competitive accessibility, and the alternative targets we suggest “Increase by X% the share of jobs in high quality transit-served locations” and “Increase by X

% share of housing in high quality transit-served areas” will prioritize scenarios where accessibility is greater.

- 7. We suggest Targets #9a, “Increase the number and quality of travel choices as measured by an improvement in accessibility by X%, particularly for auto and/or transit captive groups” and #9b, “Ensure that transit supply is adequate to accommodate transit demand (load factors of no more than 1.0)”**

As the area most directly affected by the investment and policy decisions made in the regional transportation plan, transportation system effectiveness should be a core goal of the SCS, and we strongly believe this should be one of the most robust areas of performance measurement in the SCS. In order to prioritize scenarios that increase the number of attractive transportation choice to users, we offer Target #9a, “Increase the number and quality of travel choices as measured by an improvement in accessibility by X%, particularly for auto and/or transit captive groups” This could be calculated from the log sum of the mode choices in the travel demand model. Another way to capture this accessibility would be by measuring the number of employment or recreational opportunities available within a given radius to a household, through the destination log sum model. We believe these measures are superior to the travel time by mode target proposed by MTC/ABAG because they consider accessibility in a more comprehensive way.

Secondly, target #9b, “Ensure that transit supply is adequate to accommodate transit demand (load factors of no more than 1.0)” would serve to correct a serious shortcoming in past regional planning efforts. Absent a transit capacity-constrained model (which we are currently nearing completion of developing for our regional travel demand model SF-CHAMP), examining load factors allows for a reality check on the assumptions of modeled transit ridership. As the region’s central core transit trunk is at capacity, it is likely that – absent adequate investment – transit riders would be turned away. In these cases, careful post-processing of model results will be needed to estimate the final mode choices of these travelers.

- 8. We suggest weighting Target 10 “Maintain the Transportation System in a State of Good Repair” (SOGR) by demand to reflect the relative importance of maintenance of different parts of our transportation system.**

While we support the region’s fix-it-first policy, we recognize the need to prioritize even within this important area of our regional investment policy. Achieving SOGR in the future may require prioritizing some infrastructure and consciously letting other infrastructure become the purview of local investment policy. To help prioritize the region’s needs, we propose focusing on infrastructure that is more regionally significant and/or experiences much higher levels of usage on a day-to-day basis. This principle should be reflected in Target 10 by weighting each measure based on future demand.

- 9. Modify Target #10c to make explicit the weighting of transit capital age by asset value, “Reduce average transit asset age, weighted by asset value, to 50% of useful life”, and we offer additional comments on the transit State of Good Repair targets.**

We appreciate the suggested transit state of good repair methodology refinement over that used in Transportation 2035, to weight asset age by the replacement cost, thus emphasizing the most

costly assets which are hardest to replace. We request making this methodology change explicit in the target. Additionally, while the proposed target is an acceptable measurement for the high-level purposes of SCS performance measurement, we wanted to point out that the target departs from our municipal transit state of good repair goals, which focus on prioritizing replacement of assets beyond their useful life that have the highest impact to transit operations, and investing in asset replacement strategies with the lowest possible lifecycle costs. We encourage further discussion on potential targets that reflect and forecast life cycle costs to complement the 50% of useful life target. At a minimum, we hope this can be considered as an indicator area and that the policy can be further developed in subsequent discussions about regional investments to achieve a better transit state of good repair

Thank you for considering our comments. We look forward to discussing them further at the December 7 ad hoc meeting as well as at a future Regional Advisory Working Group meeting.

Sincerely,



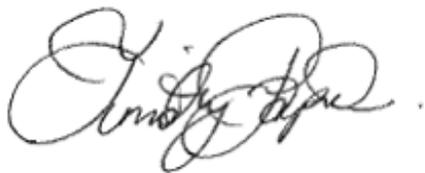
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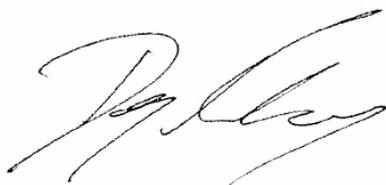
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