



May 18, 2010

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Subject: Comments on Regional Advisory Working Group April 28, 2010 meeting and materials

Dear Ted, Doug, and Ken:

City and County of San Francisco agencies appreciate the opportunity to provide input on the materials provided for the first Regional Advisory Working Group (RAWG). ABAG and MTC are embarking on a tremendously important effort to curb transportation's contribution to climate change and we look forward to participating in this process over the coming years. We offer the following joint comments on the agenda items from the first meeting on behalf of City and County of San Francisco agencies.

1. More information on how 2009 Regional Transportation Plan (RTP) scenario findings relate to Assembly Bill 32 Global Warming Solutions Act of 2006 (AB 32) goals and Scoping Plan is necessary to inform target-setting process

In order to provide input on the question of an appropriate greenhouse gas emissions (GHG) reduction target for the region, we request additional information on how the per capita metric for the 2009 RTP 2005, 2035, and 2035 "best scenario" metrics translate to absolute changes in GHG emissions relative to 1990 levels, as well as to the 2020 goal set by AB 32. The Scoping Plan identified 5 million metric tons (MMT) as a conservative estimate of what might be achieved statewide as a result of Senate Bill 375 (SB 375). Please clarify what portion of this is expected to be achieved in the Bay Area for the range of targets under consideration. How do the three percent and eleven percent high-end RTP scenarios perform in terms of absolute GHG load as well as per capita emissions? Understanding

these metrics will help us propose a target that makes a good-faith effort towards achieving the legislative goals of AB 32, which we believe means at least reversing the trend of increasing GHGs.

2. We suggest alternative performance metrics

We appreciated the lively discussion on performance objectives at the first RAWG meeting. As several RAWG members expressed at that meeting, we are concerned by various metrics under consideration. In regard to the discussion around metrics related to Economy, we agree with the concerns about focusing on the proposed use of the vehicle hours of delay/capita (VHD/capita) metric under the “Economy” principle. We also do not agree with the use of “employment growth” as a measure of Economy. The SB 375 Sustainable Communities Strategy (SCS) takes job growth as an input and is not focused on growing jobs as an output.

We believe, and international best practice dictates, that reducing the overall energy intensity per passenger VMT and the aggregate total VMT should be the overarching climate, air quality and energy efficiency goals for the region, state and nation. While we cannot regulate the technology and energy propulsion systems, we can focus on demand management and strategic capacity from sustainable modes (transit, bicycle, and walking linked to compact development) to support the reduction in vehicle and propulsion energy intensity. We offer the following additional performance objectives related to the transportation system’s performance and a more efficient development pattern for the region:

- Decreasing ratio of average transit to auto travel times for trips in a given market(s)
- Decreasing peak to off-peak ratio for travel time for trips in a given market(s)
- Decreasing average trip lengths
- Increasing transit mode share

It is also striking that the metrics for Economy do not explicitly consider the financial implications on the private sector, particularly in the realm of housing production. Although we are aware that the model is not set up to assess these issues, the model at least needs to find some way to measure the potential impacts or likelihood of success in shifting market forces for real estate development in particular in the near term vs. medium and long-term. This is the equivalent of “the financially constrained alternative” that is required for the publicly funded world of transportation.

In regard to equity, we would note that transportation metrics are not the only or most important metrics to consider. The impact of the system on travel time and/or cost for lower-income or transit-dependent individuals are good measure for transportation equity. There needs to be at least one explicitly non-transportation focused metric for equity that focuses on the implications of the housing development pattern for lower-income people and federally protected classes. We suggest that we consider the issues of access to quality schools as a basic measure, although increased/decreased racial segregation may also be a useful metric.

The above suggestions and comments are initial suggestions for performance metrics; however, we will continue to collaborate amongst our agencies to provide further feedback.

3. Refinements are needed to the proposed regional/local Sustainable Communities Strategy (SCS) preparation process

We look forward to discussing the six-step local/regional process for the preparation of the SCS at the next Congestion Management Agencies (CMA) Director's meeting or a future RAWG meeting. Based on our understanding of this process as outlined in the packet, we do have some suggested modifications to the process.

- *The growth distribution discussion must be tied to the infrastructure adequacy and investment discussion.* Currently, development of transportation investment scenarios appears to be proposed at the latter stages of the six-step process. We believe it is important to discuss the investment principles regarding growth up front in order to provide the proper context for decision-making. In recent ABAG projections series, the core cities of San Francisco, Oakland and San Jose alone account for 42% of the region's growth. This represents a significant increase in housing and jobs over the next 25 years for areas that face a host of challenges including local infrastructure, transit capacity infrastructure, and subsidy available for affordable housing. The existing levels of investment from local, state and federal sources are woefully insufficient to accommodate the growth needs we expect to take on. Any consideration of growth assignments should be tied to recognition of the need to prioritize infrastructure and network improvements in those areas.
- *Transportation scenarios should be developed and tested concurrently with land use scenarios.* SB 375 requires better coordination between transportation and land use. The law recognizes that there are significant interactions between land use and transportation and that better coordination is needed. However, the Bay Area process as outlined, first attempts to optimize land use in Steps 1, 2, and 3, and then introduces transportation in Step 4. We suggest developing several scenarios that vary on both the transportation and land use dimensions together starting in Step 1, and then making iterative modifications to both the growth distribution and the transportation network until outcomes are optimized based on performance objectives. We believe this process is more consistent with the intent of SB 375. In addition, as noted above, it is challenging to gauge the usefulness of a financially "blind" land use strategy in setting the land use scenario if the plan actually needs to result in reduced GHG emissions.
- *Input from local agencies should begin in Step 1.* We would like the opportunity to provide input before the regional agencies finalize the exploratory growth distribution (Step 1). It seems that after Step 1, changes to the distribution will only occur within the sub-region. We believe it is important to consider a range of growth distributions and transportation networks that vary at the regional level. After Step 1, it appears that there are no opportunities for changes outside of the sub-region.

In addition, it would be helpful if these six steps could be mapped to the "Planning Process: Phase 1 Detail for 2010" timeline to help us understand how this process ties into the larger

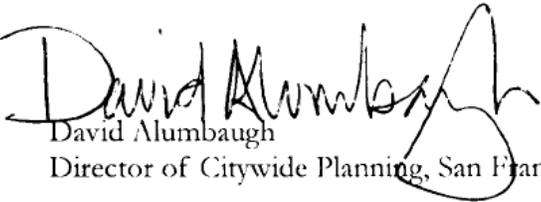
planning process.

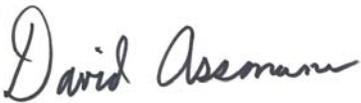
4. We suggest a future RAWG agenda item on how performance measurement will be used to inform investment decisions.

The Performance Assessment Report for the T2035 Plan set an important precedent in using performance analysis to guide investment decisions. Using a more refined and robust travel demand forecasting model, this approach could be strengthened in the upcoming SCS/RTP planning process. Our agencies are working together to complete an update to the Climate Action Plan (CAP) for the land use and transportation sector within San Francisco by the end of the year. The transportation CAP will focus on cost-effective GHG reductions. We urge ABAG/MTC to adopt a similar approach in prioritizing investments in the RTP and hope we can discuss this at a future RAWG meeting. Focusing on the most cost-effective GHG reduction strategies that take into account demand management in the next RTP will increase the likelihood that the region could reverse the trend in increasing aggregate GHG increases from the transportation sector.

Thank you for considering our comments. We look forward to participating in the RAWG and working together with MTC, ABAG, and other stakeholders to reduce transportation's contribution to climate change in the Bay Area.

Sincerely,

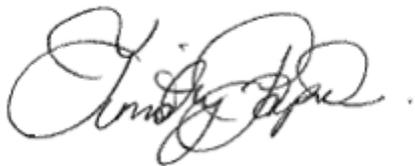

David Alumbaugh
Director of Citywide Planning, San Francisco Planning Department



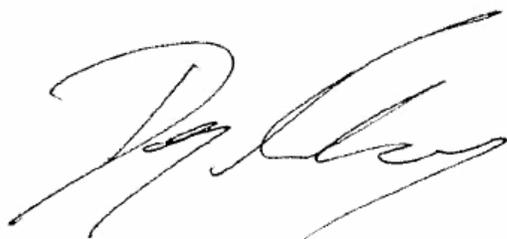
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cc: JLM, MEL, ALA, BC, LB, Chron, File: SB 375