



SAN FRANCISCO
PLANNING DEPARTMENT

SFMTA | Municipal Transportation Agency



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June 30, 2010

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Subject: Comments on Regional Advisory Working Group May 25, 2010 meeting and materials

Dear Ted, Doug, and Ken:

City and County of San Francisco agencies appreciate the opportunity to continue to provide input on the Regional Advisory Working Group agenda items. We recognize the amount of time and effort the regional agencies have already devoted to local government outreach. This high level of coordination is essential to success in developing the Bay Area's first Sustainable Communities Strategy. We offer the following joint comments on the agenda items from the second meeting on behalf of City and County of San Francisco agencies.

Significant policy change is necessary to realize an infill, TOD regional growth forecast, including prioritizing investment in the cities that are expected to create the majority of the new housing. San Francisco is committed to producing a significant amount of housing at all income levels over the next 25 years. We support a well-distributed regional TOD allocation of housing in the SCS, and regional policies and reforms that help enable the needed levels of housing production at all price levels. However, we believe that methodology for allocating housing responsibilities needs to take into account basic financial analysis associated with affordable housing in order for the region to adopt the most effective SCS.

Furthermore, because the market will not yield a smart growth development pattern consistent with the region's policy-based projections on its own, a range of policy tools, both sticks and carrots, is needed to realize the region's preferred distribution of growth.

For these reasons, we urge the region to consider the following

1. Adopt a methodology for the housing allocations that considers various land use scenarios on the basis of financial feasibility and the relative efficacy in meeting the desired metrics for equity, economy, and the environment given those financial constraints. Tactically, this would involve the following steps:
 - a. forecast the public expenditures needed, and revenues available, to produce the needed affordable housing under alternative scenarios;
 - b. analyze the effectiveness of the scenarios in light of the financial shortfall;
 - c. identify funding options for addressing the financial shortfall; and
 - d. adjust the preferred land use scenario to minimize the need for in-commuting.

To support public engagement and understanding of these issues in the upcoming regional growth assignment process, it would be useful for the region to provide 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 at least, 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 create additional funding to accomplish these goals.

2. Expand and prioritize investments in areas that accommodate growth, particularly affordable housing. As discussed at the RAWG, the level of resources necessary to support infill development within the region's PDAs is great. We encourage the regional agencies to build on the T2035 Plan's initiative to direct Transportation for Livable Communities (TLC) funding to PDAs by significantly expanding the range of fund sources to support PDAs in the SCS. This could include re-focusing existing transportation fund sources (see point 4 below), identifying relevant existing other/non-transportation fund sources (such as the aforementioned Livability initiative, or public health or social services programs), leveraging private sector funds, and pursuing new revenue sources at the regional, state or Federal levels.
3. Tie the level of investment to the amount of housing planned and the transportation system performance of a given PDA or city. The identification of PDAs within the region to accommodate more than half the region's housing need on 3% of the land is a great start to changing the region's development pattern. As discussions to date regarding the PDA Assessment have indicated, not all PDAs are created equal in terms of their level of need, amount of growth they can accommodate, or relationship to other PDAs. To that end, we believe it is important that a more nuanced investment policy is appropriate, where PDAs that are planning to accommodate more growth, or are regionally significant (e.g. located along a regional transit corridor), receive higher priority for funding. Funding should also be directed to cost-effective investments.
4. Clarify what RTP funds are discretionary. In the May RAWG materials, T2035 funding commitments that are called out as supportive of the SCS include:
 - a. Transportation for Livable Communities
 - b. Climate initiative program
 - c. Local streets and road maintenance

d. Regional bike plan program

Beyond these sources, we believe transit capital (both maintenance and expansion) and operating funds could have a role in incentivizing PDAs. The region also has a role in endorsing the use of STIP funds, which although prioritized mainly through the CMAs, could be asked to support PDAs as a matter of priority, even within a given county. Given the current bleak transportation funding environment, we must squeeze the most performance out of every dollar we invest in the transportation system. It is important to have this discussion before we begin the regional growth assignment process.

5. Transportation pricing, clean vehicle technology and land use focus are all necessary complements to a smart growth SCS investment strategy. The 2035 RTP took a major step to integrate pricing into the region's strategies for managing demand. We acknowledge the potential role of electric vehicles – accelerating deployment of EV infrastructure should be explored further in the SCS. However, given the imperative to manage VMT and realize a more efficient and equitable regional growth pattern, we believe that technology strategies are most effectively paired with pricing and land use strategies. The region has begun to articulate a regional pricing strategy with the proposed Regional High-Occupancy Toll Network and imminent pilot of variable tolls on the Bay Bridge. We look forward to sharing the findings of our SFpark Urban Partnership pilot and our Mobility Access and Pricing Study feasibility study as further examples of how local road pricing can contribute to the regional strategy. The SCS should consider additional ways to use pricing to set the right signal to motorists and to expand mobility options for travelers.

Thank you for considering our comments. We look forward to continuing to participate in the SCS Regional Advisory Working Group.

Sincerely,



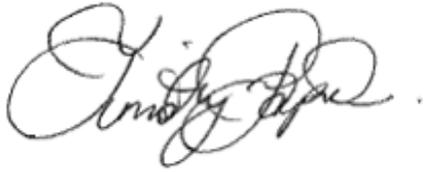
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cc: JLM, MEL, ALA, BC, LB, Chron, File: SCS