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June 21, 2011

Metropolitan Transportation Commission
Association of Bay Area Governments
101 Eighth Street
Oakland, California 94607

**Re: SPUR comments on Sustainable Communities Strategy/Regional
Transportation Plan (SCS/RTP) scenarios**

Dear MTC and ABAG Administrative Committee,

Thank you for this opportunity to comment on the SCS/RTP scenarios being developed as part of Bay Area Plan. This is an important opportunity to highlight the key issues and tradeoffs influencing the future of the Bay Area.

The San Francisco Planning and Urban Research Association (SPUR) wishes to offer several comments about this stage of the SCS/RTP as well as specific recommendations concerning the importance of fully developing unconstrained scenarios. The ideas in this memo are the result of thorough study and debate by SPUR's Transportation Policy Board.

I. The most powerful regional policy lever to shape growth is the allocation of transportation and infrastructure funds. The SCS/RTP offers the Bay Area an opportunity to focus our scarce transportation funds in a way that supports more concentrated growth patterns. This means focusing dollars on maintenance and operations where we have already invested the majority of our infrastructure, even if those places in the "core" have not grown as much in recent decades. We should also focus our limited expansion funds on investments that increase speed and capacity where there is already crowding. We can no longer afford an infrastructure system that continues to push outward, inducing more growth and demand on a stretched system.

II. The SCS/RTP should help inspire local governments to plan and facilitate quality new development in their cores and around transit. This means prioritizing jobs and housing along transit corridors and throughout areas that are easily walkable. The SCS/RTP should be a document that presents a vision for a future Bay Area that local governments are motivated to realize.

III. The adopted SCS/RTP should provide incentives that reward cities and counties for approving and supporting development in the right places.

One option would be to reward those cities that accept planned infill growth with street maintenance funds.

IV. The adopted SCS/RTP should include policies that best support a focused transportation infrastructure. Such policies include road pricing and parking reform.

The following comments are specific to the scenarios before the MTC and ABAG Administrative Committee.

1. A scenario planning exercise is different from a forecast – and SB 375 calls for both. Scenarios, including the “Preferred Scenario” should be unconstrained. The forecast, however, should try to meet the scenario and identify the constraints to implementing it.

Scenario planning is different from a forecast of regional growth. Scenarios are narratives of future growth and investment. And the so-called “Preferred Scenario” should in fact represent our best aspirations for the region’s future. By contrast, a forecast must be a realistic view of the future that recognizes key constraints. The forecast should use policies, incentives and other tools to be as close to this “Preferred Scenario” as possible.

SB 375 calls for an SCS that identifies areas in the region sufficient to house all the region's population, including all economic segments. To do so requires an analysis of population growth based on economic and demographic factors, and one that is unconstrained by housing supply. SPUR believes that this requirement of SB 375 should be synonymous with the Preferred Scenario and should be unconstrained

The purpose of the scenario planning exercise is to test the ramifications of different ways that the Bay Area could grow. Scenarios are a chance to “think big” and aspire towards a Bay Area that reverses our recent decades of auto-oriented growth. Scenario planning also provides a chance to identify how to meet our full housing need, reduce greenhouse gas emissions and strengthen our region’s economic prosperity. That means the scenarios *can* and *should* make assumptions about how certain places will grow that are different from “economic market feasibility, entitlement issues, and deficits in public investment”¹.

The scenarios should all have the same inputs (i.e. total population and job growth) as well as all achieve the region’s two key targets – house all the region’s population including all income segments and result in a per capita GHG reduction of 15 percent per capita.

If the key scenarios are constrained from the outset, it becomes impossible to truly assess different options for growth. It also means the process becomes less transparent and easily explainable to local government, the public and other stakeholders.

Staff noted that they already presented two unconstrained scenarios – the Initial Vision Scenario and the Core Concentration Land Use Option 2. However, these scenarios do not offer sufficient detail to be discarded in favor of “constrained” scenarios that do not meet the housing target. The IVS lacks a narrative of how the region should grow and also made no assumptions of changes to employment distribution. And the Core Concentration Land Use Option 2 is not detailed enough for the region to evaluate whether or not it reflects our best aspirations.

Separately, the SCS should also include a “forecasted development pattern for the region”, which (when integrated with the transportation network and transportation measures and policies) achieves to the extent practicable the CO2 reduction targets. This forecast (unlike the Preferred Scenario) must be realistic and constrained by supply factors in order to comply with Federal requirements, including

¹ Barriers noted in the staff memo of June 16, 2011

the Clean Air Act.

The best way to transition from the scenario planning to the forecast is for staff and commissioners to identify two to three alternative scenarios for the purposes of modeling. Then, the region should select a Preferred Scenario, which is essentially a Plan for the region's growth. At that point, it is appropriate to constrain that scenario based on supply and market factors. That becomes the realistic forecast. The forecast would then use policies, incentives and other measures to try to match as closely as possible to the Preferred Scenario. But ultimately it is this forecast that must be realistic and constrained, not the Preferred Scenario.

Limiting the scenarios at this point is not appropriate and makes the entire SCS process less transparent and more difficult to follow. The scenarios, including the Preferred Scenario should be unconstrained. Only then can the region assess the difference between how we should grow and how we will likely grow.

2. Staff should bring to their advisory groups (such as the Regional Advisory Working Group and the Policy Advisory Council) the details of what is assumed in each scenario and post on onebayarea.org.

Here are several of the key items that should be explained and specified within the scenarios:

- What is meant by phrases like “Core Concentration” and “Outer Bay Area Growth”?
- What are the assumptions about employment distribution? The IVS did not include any analysis of changes to the region's employment distribution. The scenarios must do this but the details are not included and should be.
- Where is the map showing how much growth is directed to certain places?
- Where does the money go that is redirected from maintenance to other uses in the Expanded Network (Transportation Option 3)?
- Explain why the Core Transit Capacity Network option increases maintenance funds from 80 to 85 percent while the Expanded Network decreases it from 80 to 70 instead of changing both by the same amount.

3. Make sure all land use options meet the region's housing target.

As noted above, the scenario process is not the appropriate time to scale back on our responsibility to plan for the region's future. If the housing scenario is not realistic, explain why when it becomes a forecast.

4. Include road pricing of existing lanes as part of your policy scenarios.

The policy slides in the SCS/RTP previously included “road pricing” as a policy option. Now that is missing and should be included in policy discussions. SPUR notes that well-designed road pricing can effectively and efficiently achieve numerous regional goals, particularly if we price existing lanes of traffic. Revenue from these lanes could go into maintenance of that highway, transit along the same corridor and still provide additional funds for local streets and roads that might be impacted by highway pricing. Low-income residents who must use the highways but lack the funds to pay on a frequent basis could receive some limited number of free highway trips per year.

The policy of implementing road pricing is consistent with the draft General Plan of the City of San Jose, the region's largest city. In San Jose's draft 2040 General Plan they call for the development of toll lanes on all major freeways and expressways in Santa Clara County.² SPUR argues that MTC should study converting existing lanes to toll lanes on major freeways and expressways with potential pilot projects on key corridors like I-80 in the East Bay.

Thank you for your consideration of these recommendations.

Regards,

A handwritten signature in black ink, appearing to read 'GT' with a long, sweeping horizontal stroke extending to the right.

Egon Terplan
Regional Planning Director
San Francisco Planning and Urban Research Association (SPUR)

² See: "TR-11.2 Take a leadership role in working with the County, the Metropolitan Transportation Commission, Caltrans, VTA and other municipalities to establish congestion pricing for automobile travel through and within Santa Clara County. And TR-11.3 Support and collaborate on the development of toll lanes on all major freeways and expressways in Santa Clara County." http://www.sanjoseca.gov/planning/gp_update/DraftPlan/DRAFT5_Chapter6.pdf