



26 October 2010

**Re: Performance Targets**

Dear MTC and ABAG Staff:

Thank you for the opportunity to provide additional input as you prepare initial staff recommendations for a full set of SCS Performance Targets. Please see below for a discussion of the principal goals that we would like each target to achieve, and our suggestions for which targets appear to be moving in a better direction at this time. There are clearly still some uncertainties around which targets are able to be forecast with the current models, what metrics will be used to measure the targets, what assumptions are used when running the models, and the nature of the land use and transportation choices that will be defined in each scenario. As the process is clarified over the coming weeks, the exact appropriate target to achieve different goals and outcomes may shift. In addition, we know that regional agency staff and other groups are doing additional research into how to model various outcomes, including health outcomes. We look forward to continuing to participate in the process of defining SCS performance targets.

**Climate Protection**

We support the statutory target of reducing CO<sub>2</sub> per capita by 7% by 2020 and by 15% by 2035.

1. *Reduce CO<sub>2</sub> per capita.*

**Healthy & Safe Communities**

The use of non-motorized transportation modes – walking and biking – increases physical activity and reduces the risk of obesity and chronic diseases like diabetes and heart disease. In order for communities to have access both to health and safety, it is critical that they have sufficient access to public transit, especially buses. Cost is a key factor to accessibility. In order to measure this outcome, a performance target must be disaggregated by public transit mode (bus, light rail, train, ferry, etc) to reflect the fact that more expensive transit modes are less accessible to low-income communities. One potential target would be:

2. *Increase mode-share for public transit (disaggregated by transit mode: bus, light rail, train, ferry, etc.) and for non-motorized modes.*

**Clean Air**

We support the proposed air quality target to reduce PM<sub>2.5</sub> overall and in communities of concern.

3. *Reduce PM<sub>2.5</sub> emissions overall and in communities of concern adjacent to transportation hot spots.*

**Adequate Housing**

Performance targets for housing must assess a scenario's performance in at least two main areas: (1) displacement of existing communities of concern, and (2) increasing access of lower income residents to existing wealthier communities with better schools, safer streets, and employment opportunities. To achieve the first goal, we recommend a target of:

4. *Prevent displacement by preventing the out-migration of people of color, low income communities in areas where property or rent values increase.*

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We currently have two suggested directions for targets that might assess progress towards the second goal:

5. *Equitably distribute new housing growth equally across neighborhoods of all income levels, e.g. ensure that 30% of new housing growth occurs in 30% wealthiest census tracts and 30% of new housing growth occurs in 30% poorest census tracts.*
6. *Achieve at least X% of new growth in areas served by high-performing public schools.*

We look forward to continuing to work with you to define an ideal target that achieves the second goal. Additionally, we recommend that the jobs-housing fit in both urban and suburban areas be measured to determine how much housing close to jobs is affordable to workers who hold those jobs.

### **Equitable Access**

In past RTP Equity Analyses, bus and rail transit have been aggregated, thus inaccurately modeling that communities of concern had increased transportation accessibility, when in fact high-fare rail transit is less accessible for low-income communities. Given the critical need for public investment to result in more affordable, reliable, frequent, and accessible transit service, this target is important to ensure that communities can afford the transit that they will need to access jobs and essential services. A total commute time of 30 minutes and a one-way fare of \$2.50 is an arbitrary but fairly reasonable proxy measure for affordability, given inflation over the next 25 years.

7. *Increase the number of residents within 30 minutes and \$2.50 dollars of jobs and essential services.*

### **Open Space Preservation / Efficient Use of Land**

The Bay Area's natural lands are our 'green infrastructure.' They provide essential services to Bay Area residents – provision of fresh local food, a clean and safe water supply, healthy recreational opportunities, and scenic views with a diversity of plants and wildlife. In addition, new development on natural lands is more likely to result in more driving and therefore higher CO2 emissions than development in PDAs or other areas near transit. SB375 requires regions to “gather and consider the best practically available scientific information regarding resource areas and farmland in the region” when creating the SCS. This information should be used to inform where future growth should and should not be planned. We recommend a target of:

8. *Preserve X% of the region's most essential agricultural, water resource, habitat, and recreational lands.*

(“Preserve” in this context means “do not show future development on.”)

The new 'efficient use of land' target is a useful proxy to measure whether we are more likely to achieve many of the outcomes that we care about, including GHG reduction, increased access, reduced costs, and open space preservation. We would support inclusion of a target such as:

9. *Ensure that X% of future job and population growth occurs in PDAs or other transit priority areas.*

However, this target is not an acceptable replacement for a genuine open space preservation target. With only the latter target, it is entirely possible that we could achieve a very high percentage of future growth in areas near transit, yet still lose thousands of acres of the richest agricultural soils in the region. It is critical to set a target and measure our progress in preserving those valuable lands.

### **Economic Health**

Household costs for housing and transportation are an important indicator of economic health. Ensuring a reasonable cost of living for employees helps employers to recruit and retain top talent. In addition, the lower the share of household income spent on housing and transportation, the more dollars households can spend on other goods and services, stimulating the local economy.

10. *Reduce share of income consumed by housing and transportation [by X%] for low-income households, maintain for other households.*

We would also be open to also measuring total cost (e.g. including infrastructure) as an economic health measurement. However, we should not lose the separate measurement of household costs.

Economic health means more than simply economic growth. Because economic growth does not account for economic inequality or community stability, growth alone does not suggest an improved quality of life for all communities. In fact, historically, economic growth at the regional level have often come while some communities experience high levels of unemployment and poverty while bearing the burdens of unsustainable and destructive economic practices. Examples of more holistic and equitable measures of economic health could include reducing economic inequality (using a regional Gini co-efficient, for example), providing full employment for the Bay Area's population, or increasing the Human Development Index for the Bay Area. We encourage the use of such measures to reflect economic health.

Thank you again for the opportunity to provide input.

Sincerely,

A handwritten signature in cursive script that reads "Stephanie Reyes".

Stephanie Reyes, Policy Director