

June 21, 2011

Mark Green, Chair, and Members
ABAG Administrative Committee

Adrienne Tissier, Chair, and Members
Metropolitan Transportation Commission

Dear Chairs and Members:

We join several of your members and two of your advisory bodies – MTC’s Policy Advisory Council and the RTP/SCS Equity Working Group – in urging you to add a scenario that maximizes social equity to the set of alternatives that MTC and ABAG will develop and analyze this summer. The list of scenarios before you today, which has not changed since it was released to the public less than three weeks ago, will be incomplete without such a scenario. Including one in the analysis is critical to your informed decision making and the public’s meaningful participation.

Instead of voting to accept the set of five alternatives before you today, we ask that you **direct staff to include for analysis an additional scenario that maximizes social equity — the Equity, Environment, and Jobs Scenario (see attached) — and to ensure that *all* of the scenarios advance social equity outcomes.** Staff should then present you with an updated slate of alternatives at your July meeting.

The best Regional Transportation Plan (RTP) and Sustainable Communities Strategy (SCS) will be the one that most strongly promotes all of the “three Es”: equity for low-income communities and communities of color, economic vitality, and environmental health. None of the five proposed Alternative Scenarios before you today offers that choice.

Key components of a proposed Equity, Environment, and Jobs Scenario are summarized on the **attached sheet** and include maximizing the funds needed to operate local transit service while providing affordable housing in job-rich suburban communities as well as in the urban core. We believe that this scenario will outperform the five currently before you, not only in terms of social equity performance measures, but also in terms of GHG reduction, local job creation, housing, and other important regional goals. Hard facts support our view: research shows that transit operating expenditures create 40% more jobs than spending on capital projects, and that affordable housing near entry-level jobs improves access to economic opportunity. Similarly, investing in robust local transit operations is the most cost-effective way to maximize GHG reductions, and affordable housing near jobs directly reduces driving.

The failure to include and analyze an equity scenario will not only deprive the public and decision makers of important information about the range of choices available, but also contradicts requests expressed at the June 10 joint meeting of the MTC Planning Committee and ABAG Administrative Committee. At least four members of these committees – Jake Mackenzie, Tom Bates, Rose Jacobs Gibson, and Mark Luce – expressed some support for adding an Equity, Environment, and Jobs scenario, and asked staff to address this issue.

Instead of accommodating the requests of these members, the latest staff report from Executive Directors Heminger and Rapport leaves the scenario definitions unchanged in any way from those

proposed on June 3. The staff report only offers explanations about why it believes that “the key components of the advocates' proposed equity scenario will be adequately addressed in all the staff-proposed scenarios.” But staff does not explain how the presence of “equity elements” in some performance targets, or a stand-alone equity analysis of all the scenarios, will result in a scenario that combines the land-use and transportation features that will maximize equity. Nor does staff address the consequences of prematurely removing from consideration this distinctly different combination of land-use and transportation elements at this early stage, without any study.

This response also shuts out the meaningful input of advisory groups whose work is not yet completed. The work of your Housing Methodology Committee and Equity Working Group, bodies you created to advise you on the Sustainable Communities Strategy, is ongoing and not reflected in the five scenarios now before you. These bodies should have a meaningful opportunity to inform the scenarios. Rather than voting on an incomplete set of alternatives today, we request that staff be directed to present an updated set of scenarios, including an equity-focused scenario, at your meeting next month.

Finally, we urge you to ensure that the transportation network staff models properly accounts, in every scenario, for the region’s financial ability to operate *and* maintain the region’s whole transportation network. This means recognizing the effect of operating and maintenance shortfalls on transit as well as on the local streets network that our buses rely on.

We look forward to working with staff to develop the specific details of the Equity, Environment and Jobs Scenario, and of the other staff-outlined scenarios.

Sincerely,

ACCE Riders for Transit Justice

Albany Rollers & Strollers

Asian Pacific Environmental Network (APEN)

Bay Area Healthy 880 Communities

Bay Area Legal Aid

Bay Area Regional Health Inequities Initiative (BARHII)

Bay Localize

Breakthrough Communities

Breathe California

Brightline Defense Project

California Affordable Housing Law Project/ Public Interest Law Project

Causa Justa :: Just Cause

Center for Progressive Action

East Bay Housing Organizations (EBHO)

Ella Baker Center

Genesis

Grassroots Leadership Network of Marin

Green Youth Alliance

Greenbelt Alliance

Natural Resources Defense Council (NRDC)

PolicyLink

Public Advocates

Public Interest Law Firm, a project of the Law Foundation of Silicon Valley

Regional Alliance for Transit (RAFT)

Regional Asthma Management and Prevention (RAMP), A Project of the Public Health Institute

SF Bay Walks

SF Council of Community Housing Organizations (CCHO)

SF Walks & Rides

TransForm

UFCW Local 5

United Seniors of Oakland & Alameda County

Urban Habitat

Walk&Roll Berkeley

Enclosure: Equity, Environment and Jobs Scenario features

cc: MTC Commissioners and ABAG Board Members
MTC and ABAG staff

Equity, Environment and Jobs Scenario

MTC and ABAG should put an “Equity, Environment, and Jobs” scenario on the table for consideration. We recommend the scenario include the following key features.

Land Use Components of the Scenario:

- Distribute a substantial proportion of the region’s overall housing growth to high-opportunity communities based on the presence of jobs, high-performing schools, transit service levels, and other indicators of opportunity.
- Allocate to cities with disproportionately low numbers of lower-income residents a proportionately higher percentage of extremely-low, very-low, and low income housing units.

Transportation Components of the Scenario:

- Maximize existing and new funding for local transit operations, and prioritize operating assistance for those communities in which lower-income populations are concentrated or for job centers which commit to more lower-income housing growth, with a goal of increasing transit operating funding substantially.
- Prioritize capital funds that cannot be shifted or swapped to transit operations for maintenance of the existing transit system rather than capital expansion.
- Include only the most cost-effective transit expansion projects, including those prioritized in CBTPs (Community Based Transportation Plans), in communities that protect existing low-income residents from displacement.
- Prioritize capital projects that will improve health and safety, especially in Communities of Concern, that equalize mortality rates by race and income.
- Set aside a portion of Local Streets & Roads (LSR) and other funds to reward local jurisdictions that accommodate, and provide local funding to build, a significant portion of the region’s lower-income housing need and/or enact strong policies to protect existing extremely-low, very-low, and low income residents from displacement.

We look forward to working with staff to develop the specific details of the Equity, Environment and Jobs Scenario, and of the other staff-outlined scenarios.