

**Metropolitan Transportation Commission and Association of Bay Area Governments**  
**MTC Planning Committee and ABAG Administrative Committee**

**May 9, 2025**

**Agenda Item 8a**

**Transit-Oriented Communities (TOC) Policy: Draft Evaluation Criteria**

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**Subject:**

Presentation of a draft framework to evaluate jurisdiction progress toward compliance with the TOC Policy.

**Background:**

In September 2022, MTC adopted the TOC Policy [[MTC Resolution No. 4530](https://mtc.ca.gov/digital-library/5023449-mtc-resolution-number-4530-transit-oriented-communities-policy) (<https://mtc.ca.gov/digital-library/5023449-mtc-resolution-number-4530-transit-oriented-communities-policy>)] to support the region's transit investments by creating communities around transit stations and along transit corridors that not only enable transit ridership, but also are places where all Bay Area residents can live, work, and access services. The TOC Policy applies to the half-mile area around existing and planned fixed-guideway transit stops and stations (i.e., regional rail, commuter rail, light-rail transit, bus rapid transit, and ferries). MTC Resolution No. 4530 was revised in October 2023 to clarify the application of the TOC Policy to transit extensions.

In Resolution No. 4530, MTC committed to considering TOC compliance when prioritizing regional discretionary funding for transit extensions and the OBAG Program. The TOC Policy builds on and updates MTC's original Transit-Oriented Development (TOD) Policy adopted in 2005, with the shared goal of maximizing the region's investments in transit infrastructure by encouraging local policies that support and promote transit use. While the TOD Policy focused primarily on planned stations and housing capacity, the TOC Policy takes a broader and more inclusive approach. It applies to both existing and planned transit stations, recognizing the role of local jurisdictions in shaping land use decisions, and conditions funding accordingly—not just for transit project sponsors, but also for cities and counties. It also expands policy applicability beyond just housing to address a wider range of factors that contribute to vibrant, transit-supportive communities.

As a key program to implement the vision, goals, and strategies of Plan Bay Area 2050, the TOC Policy focuses on four core elements: land use density, affordable housing, parking management, and complete streets/ multimodal access. Four goals guide the TOC Policy and advance Plan Bay Area 2050 implementation:

- Increase the overall housing supply in part by increasing the density for new residential projects. Prioritize affordable housing in transit-rich areas.
- In areas near regional transit hubs, increase density for new commercial office development.
- Prioritize bus transit, active transportation, and shared mobility within and to/from transit-rich areas, particularly to Equity Priority Communities located more than ½ mile from transit stops or stations.
- Support and build partnerships to create equitable transit-oriented communities within the San Francisco Bay Area.

Since adoption, MTC has hosted over 250 meetings with jurisdictions, provided extensive technical assistance, and launched tools, such as the TOC Submission Portal and comprehensive Administrative Guidance. In March 2025, MTC awarded \$60 million to jurisdictions across the region in TOC-related planning and capital grants to support local implementation. As part of MTC's continued implementation of the TOC Policy, staff have begun engaging with stakeholders to gather feedback on a proposed evaluation framework that will guide how jurisdictions are assessed for TOC compliance.

**Purpose and Approach for the Draft TOC Evaluation Framework:**

The proposed evaluation framework is designed to translate the TOC Policy into a transparent, measurable system for assessing jurisdictional compliance. The framework is grounded in an approach that emphasizes impact, transparency, and continuous improvement. Rather than a binary rating (i.e., compliant or non-compliant), it is structured to evaluate the extent to which a jurisdiction is advancing the goals of the TOC Policy—such as reducing auto dependence, supporting affordable housing, and improving multimodal connectivity near transit.

This approach recognizes that jurisdictions are starting from different places and face varied challenges. To accommodate this diversity, the evaluation system offers a spectrum of

compliance, awarding partial credit for in-progress or near-compliant policies and full credit for policies that are fully aligned with TOC standards. It is designed to reward jurisdictions making measurable progress, while still incentivizing bold, outcome-driven planning. The result is a framework that is both flexible and accountable—encouraging broad participation without compromising the region’s long-term goals.

### **Overview of the Proposed Framework**

The draft evaluation framework uses a holistic scorecard to assess jurisdictional performance across the TOC Policy’s four policy components: **density, housing, parking, and station access**. Each policy component is worth 25 points, for a total of 100 points. Within each component there are multiple compliance standards with varying point weights, as outlined in **Attachment B**. Scores are calculated using a multi-tiered structure: individual policy standards receive sub-scores, which then roll up to policy component-level scores, which are then aggregated to produce a TOC area score. If a jurisdiction has multiple TOCs, the TOC area scores are averaged to a jurisdiction-wide average. Each standard includes clear criteria and, where applicable, gradations of compliance to reflect partial or substantial progress.

Based on their overall score, jurisdictions will be assigned to one of three compliance levels:

- **Level 1 (85–100 points):** Fully Compliant
- **Level 2 (40–84 points):** Partially Compliant
- **Level 3 (0–39 points):** Not Compliant

The thresholds for each compliance level are intended to incentivize jurisdictions to reach at minimum ten points per policy component. This ensures that a jurisdiction is working to achieve compliance across all four policy components but would also recognize stellar compliance in a few categories if certain policies are not feasible prior to this funding cycle.

### **Flexibility for In-Progress Efforts:**

Recognizing that some jurisdictions are in the process of adopting or finalizing TOC-supportive policies, the framework also provides flexibility for work that is underway but not yet complete. In these situations, jurisdictions will be asked to submit supporting documents, such as:

- A brief progress report outlining their current status
- A timeline for anticipated adoption or implementation

- An adopted resolution committing to compliance with TOC requirements

This documentation will allow staff to assess both the current and potential compliance of a jurisdiction. The goal is to reflect ongoing efforts in the evaluation and ensure that jurisdictions making tangible progress are appropriately recognized, even if full implementation is pending beyond the early 2026 compliance deadline.

**Stakeholder Feedback on Draft Compliance Evaluation Framework:**

Initial outreach in April 2025 included presentations and discussions with planning directors, public works staff, and representatives from County Transportation Agencies (CTAs).

Jurisdiction staff broadly supported the proposed point-based framework, especially its flexibility to recognize partial compliance and progress toward TOC-aligned policies. Local staff appreciated that the framework accommodates a range of local contexts and does not rely on an “all-or-nothing” approach. Several cities noted that the scoring structure provides a helpful incentive to move forward with in-progress policies while acknowledging political and financial realities. CTA staff and directors raised concerns that the complexity of the framework will make implementation more challenging.

Overall, stakeholders emphasized the need for greater clarity in how compliance will be scored for TOC areas that span multiple jurisdictions as well as for policies that are under development. Many jurisdictions asked how frequently scores would be reassessed, how compliance relates to funding eligibility, and whether higher scores within the partially compliant range (i.e., Level 2) would be more competitive for project funding. Smaller jurisdictions in particular emphasized the need for technical assistance and support, citing limited staff capacity and resources.

Jurisdictions also voiced a strong desire for increased flexibility, and adjustments to the proposed framework especially within the housing policy and parking policy components. Several jurisdictions requested more nuanced scoring for the housing policy component, noting that local policies may align broadly with TOC objectives but may not meet every requirement outlined in the Administrative Guidance. On parking, jurisdictions voiced concern over the feasibility of meeting the thresholds for automobile parking maximums, particularly in Tier 2 areas. Some cities discussed developer resistance due to development financing barriers, and many suggested redistributing points currently concentrated on parking maximums to other parking policies.

Stakeholders also flagged the importance of equity, noting that scoring should account for varied development markets, existing neighborhood conditions, and displacement risks. MTC staff have encouraged jurisdictions to continue testing the draft evaluation framework, submitting mock scores or examples, and engaging in follow-up discussions to help refine the framework.

**Next Steps:**

This presentation marks the launch of stakeholder engagement about the evaluation framework:

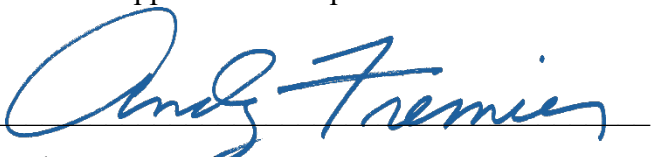
- **Spring 2025:** Technical assistance (model ordinances, implementation guides), consultant contract to support jurisdiction compliance
- **Spring/Summer 2025:** Continued engagement, refinement of evaluation framework based on feedback.
- **Fall 2025:** Presentation of the proposed final framework to MTC and ABAG committees for consideration.
- **Fall 2025:** Anticipated start of work for jurisdictions awarded TOC Policy Grants
- **January/ February 2026:** First submission deadline for TOC compliance
- **Early Fall 2026:** Final deadline for TOC compliance and assessment of work in progress

**Recommendations:**

Information

**Attachments:**

- Attachment A: Presentation
- Attachment B: Draft TOC Evaluation Framework
- Attachment C: Draft TOC Evaluation Framework Applied to Example Jurisdiction



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