

**From:** [Martha Silver](#)  
**To:** [Martha Silver](#)  
**Subject:** FW: Joint MTC Planning/ABAG Administrative Committee Agenda Item 5b (January 14, 2022)  
**Date:** Thursday, January 13, 2022 4:56:48 PM

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From: **Tim Sbranti** <[tsbranti@innovationtrivalley.org](mailto:tsbranti@innovationtrivalley.org)>  
Date: Thu, Jan 13, 2022 at 4:51 PM  
Subject: Joint MTC Planning/ABAG Administrative Committee Agenda Item 5b (January 14, 2022)  
To: MTC-ABAG Info <[info@bayareametro.gov](mailto:info@bayareametro.gov)>

Dear Chair Sperring and Honorable Commissioners:

On behalf of the Innovation Tri-Valley Leadership Group (ITV), I wanted to take this opportunity to comment on your Draft TOC Policy.

In addition to TOC Policy goals to increase residential and commercial densities - a key goal should be added to *increase transit ridership and choice*. It is a simple overarching metric for measuring the effectiveness of the plan – and something communities and stakeholders will be able to understand and accept.

#### Recognize Station Typologies

The TOC Policy should recognize the diverse and multi-centric nature of the Bay Area – that there is no “one size fits all” for a TOC - and set a goal to engage and partner with jurisdictions to meet the unique individualized goals and objectives of each one. The proposed policy determines density-based on the type of transit infrastructure – but it may be fitting to also recognize the continuum of station area typologies that exist in the Bay Area –i.e., downtown, urban neighborhood, suburban neighborhood, etc. – all with varying critical functions in the region and with gradations along the spectrum of density. It should not be assumed that the area surrounding a station always needs to have a region-wide uniform building height and density in order to serve a critical function within the transit network. Station-adjacent infrastructure improvements that could improve pedestrian and bicycle connectivity and facilitate transit will also vary by station type. By incentivizing municipalities to cater to the specific needs of each station type, it may be possible to achieve a best-case ridership return on station area investments.

#### Valley Link TOD Policy

VTA, BART and Caltrain are identified on Page 7 as transit agencies with adopted TOD policies but the Valley Link policy adopted by the Board on 12/11/19 is not acknowledged:

*Within the past several years, three of the region’s transit agencies, BART, VTA and Caltrain adopted agency-level TOD policies and developed TOD programs focusing on development of transit agency-owned property adjacent to stations. There is now an opportunity for the regional TOD Policy to coordinate with and complement these agency-level policies and programs.*

The Valley Link TOD policy (adopted 12/11/19) mirrors the MTC Resolution 3434 TOD Policy – identifying corridor level minimum thresholds that must be met and requiring the

completion of comprehensive station area plans prior to completion of project design. Station area TOD planning is underway in all stations that are part of the preferred project adopted by the Board as part of CEQA clearance. Planning for the Isabel Neighborhood Plan began in 2012 and was ultimately completed and adopted after nearly a decade-long planning effort that included extensive community outreach. This is also the case of the Dublin Transit Village Plan. These plans, as well as an anticipated plan for the Southfront Road Station, are all within designated Priority Development Areas.

It is a concern that additional costly planning processes may be required and a concern that the proposed TOC policy introduces a broad element of uncertainty for not just the local jurisdictions but for the building industry which will make them a reality.

Proposed TOC Policy is Vague

The new policy seems vague compared to the previous one. It seems to imply that MTC and others listed will negotiate an approach on a case-by-case basis. While there may be benefit in this flexible approach it may result in an uneven application of the policy. Clarification is needed on who makes the decisions and what determines compliance. It is also unclear what constitutes meeting minimum housing density thresholds - whether the test is on the ground densities met or zoning to allow it even if nothing happens.

Parking Requirements

This is a critical factor affecting a successful outcome. There needs to be a pathway identified that will bring developers and banks along or this may be a significant detriment to advancing development.

Access Gap Analysis

The policy calls for an, "Access gap analysis and accompanying improvement program for station access via a 10-minute walk, bicycle or bus/shuttle trip (including areas outside PDA boundaries). More information is needed regarding this critical component of the policy. In particular, it is specified that the recommended improvement program for station access is to be incorporated into a capital improvement plan for the jurisdiction or plan area – but does not specify how non-capital operating expenses are to be programmed and funded.

Affordable Housing and Anti-Displacement

*In addition, because low-income households are significantly more likely to utilize public transit than moderate and high-income households, adding affordable homes closer to the region's major transit investments can increase the ridership and improve the cost effectiveness of these investments while reducing GHG emissions.*

While we agree with this statement, please note that a recently published Bay Area Council report notes that in the Altamont/I580 Corridor there are an estimated 100,000 displaced Bay Area workers living in the San Joaquin Valley who travel through the Altamont Corridor each day. Close to ½ or more of these jobs are in the construction, manufacturing, health care and social assistance employment sectors which do not lend itself to remote work. These lower income households also need to be considered when designing public transit alternatives.

Thank you again for your consideration of these comments, questions, and concerns. I look forward to continued engagement with MTC Commissioners and Staff on developing an inclusive TOC Policy that meets the needs of our entire region.



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