



May 7, 2020

Metropolitan Transportation Commission &
Association of Bay Area Governments
375 Beale Street Suite 700
San Francisco, CA 94105

RE: MTC Resolution No. 3434: Transit Oriented Development (TOD) Policy Update - Agenda Item #5b on the Joint MTC Planning Committee with the Administrative Committee

Dear Commissioners and Board Members:

SPUR applauds the Commission's persistence in requesting that MTC's current Transit Oriented Development Policy be updated. We support staff's proposed process and look forward to engaging with you all as this effort advances. We encourage that resources be prioritized to keep this process moving in accordance with the proposed schedule.

The presentation accurately notes that MTC's previous TOD policy was groundbreaking in its time but is now outdated. Not only have the funds to which the policy applies been largely spent, but the development targets themselves are now inconsistent with what we know about effective TOD. For example, MTC's target -- 2,200 units per 500-acre station area -- is equivalent to an average gross density of 4 dwelling units per acre. That is clearly not enough to support the high cost of new rail investment, nor enough to meet our housing, equity, and sustainable mobility goals. We strongly support updating this policy and its standards so that it can support MTC and ABAG's adopted goals.

Thank you for prioritizing this important update that will shape land use decisions for decades to come.

Sincerely,



Laura Tolhoff
SPUR Regional Planning Policy Director