



CONTRA COSTA
transportation
authority

COMMISSIONERS

Aaron Meadows,
Chair

Darlene Gee,
Vice Chair

Mark Armstrong

Newell Americh

Ron Bernal

Diane Burgis

Ken Carlson

Chris Kelley

Sue Noack

Carlyn Obringer

Rita Xavier

Timothy Haile,
Executive Director

May 23, 2025

Metropolitan Transportation Commission (MTC)
375 Beale Street, Suite 600
San Francisco, CA 94105-2066

Subject: Transit Oriented Communities (TOC): Request for Near-Term Adjustments to Draft Evaluation Criteria

Dear Commissioners:

On behalf of Contra Costa County's jurisdictions, the Contra Costa Transportation Authority (CCTA) supports the goals of MTC's TOC Policy and appreciates the opportunity to comment on the Draft Evaluation Criteria (Agenda Item 8A, May 9, 2025). CCTA and Contra Costa County jurisdictions want to ensure our cities and towns can meaningfully implement the policy and remain eligible for One Bay Area Grant (OBAG) 4 funding; we respectfully request some near-term adjustments and clarifications:

- **Publish a compliance status report** – We request a public dashboard summarizing each jurisdiction's current TOC compliance status, outstanding actions, and deadlines. Cities cannot plan OBGA 4 applications or determine zoning amendments without knowing where they currently stand.
- **Align the evaluation timeline with OBAG 4 milestones** - Finalize compliance determinations, evaluation criteria, and any funding set-asides before county CMA calls for projects open. Uncertainty during the OBAG 3 cycle slowed local budgeting and delayed project delivery.
- **Provide flexible scoring until data gaps are resolved** - For the upcoming OBAG 4 cycle, replace the proposed quantitative scorecard with a qualitative "progress demonstration" track that recognizes good-faith efforts while MTC refines its GIS and parcel data. Several pro-housing jurisdictions in Contra Costa County cannot meet the draft minimum average densities or parking maximums today yet are actively advancing infill projects. A qualitative, narrative-based assessment ("show your good-faith progress and remaining gaps") lets cities advance projects now while MTC finishes cleaning the data.
- **Offer technical assistance** - We would ask MTC to expand their technical assistance budget to help cities input data and run financial feasibility tests, and pre-populate base zoning, density and affordability layers for all TOC areas.

2999 Oak Road
Suite 100
Walnut Creek
CA 94597
PHONE: 925.256.4700
FAX: 925.256.4701
www.ccta.net

-
- **Re-evaluate minimum density, parking maximums, and four-year commitments** - We should recalibrate average minimum density thresholds, parking maximum ratios, and the four-year policy “floor” requirements that are unrealistic in a high-tariff, inflationary environment. The standards, as written now, could suppress housing production.
 - **Preserve funding eligibility while jurisdictions advance housing actions** - Allow jurisdictions that are on track with certified housing elements and that submit a TOC corrective-action schedule to remain eligible for OBAG 4 funds. Most Contra Costa jurisdictions just wrapped up Housing Element rezonings; they need time, and sometimes council actions, to meet the higher TOC density and parking rules.

Thank you for your consideration and for your continued partnership. We hope to continue to work with you, the MTC Planning Committee Members, and MTC staff regarding this important policy.

Sincerely,



Timothy Haile
Executive Director