

via electronic mail

May 5, 2025

Eli Kaplan
Regional Planning Program
Metropolitan Transportation Commission
375 Beale Street
San Francisco, CA 94105
ekaplan@bayareametro.gov

RE: Campbell's Comments on the Draft MTC TOC Policy Scoring Framework

Regional Planner Eli Kaplan:

The City of Campbell appreciates the opportunity to provide comments on the draft Transit-Oriented Communities (TOC) Evaluation Criteria Framework understanding its role in OBAG 4 funding eligibility. We are fully supportive of the TOC goals focusing on transit-oriented development to meet the broader sustainability needs of the region. However, we are significantly concerned that the TOC Scoring Framework prescribes an approach that does not consider existing and evolving market conditions and in certain areas will act to discourage the feasibility of developing transit-oriented development projects. Please accept our feedback on key aspects of the framework based on the unique situations anticipated to be faced by local jurisdictions, including the City of Campbell, when applying for points under the draft scoring framework.

Draft MTC TOC Policy Scoring Overview

The Draft MTC TOC scoring framework requires jurisdictions to meet prescribed standards across four core areas—land use density, affordable housing (production, preservation, protection), parking management, and transit station access.

These requirements are scored using a 100-point framework, equally weighted across the four categories, to determine whether a jurisdiction is classified as “Fully Compliant,” “Partially Compliant,” or “Not Compliant,” with corresponding implications for OBAG 4 funding eligibility. The standards are intended to support equitable transit-oriented development near fixed-guideway transit corridors.

Campbell Feedback

The City of Campbell has recently adopted a General Plan and Housing Element that focuses on transit-oriented development, by planning for and supporting high density residential development around our three light rail stations. As such we strongly support the regional vision of fostering equitable, transit-supportive communities and aligning local efforts with broader state objectives. However, the current TOC evaluation framework introduces prescriptive requirements that may not be feasible or effective for all jurisdictions, particularly smaller, built-out cities like Campbell, given local constraints, economic conditions, and the recent completion of several significant long-range planning efforts.

Key concerns with the draft framework include:

- **Residential Density Requirements:** The framework's heavy emphasis on residential density does not reflect current market conditions, where high-density housing is often financially infeasible due to high construction costs, labor shortages, and limited investor interest. Many jurisdictions, including Campbell, recently updated their Housing Element and/or General Plan and adopted rezonings through extensive public engagement to satisfy RHNA 6 requirements. Additional density increases at this time would duplicate recent work and may undermine the integrity of those planning processes.

The relevance of awarding TOC points for residential density is also reduced by the current legislative environment. State laws, including AB 2011, SB 6, SB 35, SB 330, SB 423, SB 450, SB 1123, and updates to Density Bonus Law, increasingly preempt local standards and allow for higher densities regardless of local land use designations, particularly for affordable or mixed-income housing projects. The TOC scoring methodology does not appear to fully reflect these legal changes, resulting in a disconnect between the framework and the regulatory context in which jurisdictions are operating.

Parking Standards: A large share of the parking management category's 25 points is tied to adopting maximum parking standards. Eliminating parking minimums and unbundling parking from housing costs are already mandated by AB 2097 and other recent state laws. The low maximum ratios (e.g., 0.375 spaces/unit) under the TOC policy are likely unrealistic in TOC areas with limited transit coverage or constrained last-mile access. Note that under State Density Bonus Law (Gov. Code § 65915), developers may waive parking maximums that would physically preclude the construction of affordable housing. This limits the enforceability of such standards.

As a broader point, the City has received extensive feedback from residential developers that they will not pursue higher density transit-oriented development projects if the city is to impose maximum parking standards, based on customer demand and lending requirements. Combined with the current challenges already

facing the higher density housing market (interest rates, softer rental market, construction costs), the TOC mandate of parking maximums will likely have the opposite effect of stifling the feasibility to develop high density, transit-oriented projects, countering the goals of MTC's TOC program. MTC is encouraged to reduce the weight assigned to parking caps or allow flexibility through locally supported market studies and feasibility analyses.

Additionally, TOC points should reflect aspirational local efforts beyond state mandates, such as establishing transportation demand management policies, requirements for bicycle storage lockers, and adopting strategies to improve curb space management and equitable access to shared mobility, rather than duplicating compliance obligations.

- Office FAR and Commercial Stabilization Policies: Requirements to adopt minimum office FARs or commercial stabilization policies fail to reflect post-pandemic realities. Widespread remote work, persistent commercial vacancies, and evolving land use trends continue to reshape downtowns and station areas. Jurisdictions should be permitted to propose data-supported alternatives, such as adaptive reuse strategies or economic development incentives to more effectively utilize existing space, in place of fixed office density targets.
- Station Access and Averaging Across TOC Areas: The framework calls for robust planning and capital investment in Complete Streets, active transportation networks, access gap analyses, and mobility hubs. While the City fully supports these objectives, these expectations may be difficult to meet in smaller jurisdictions with limited staff or resources – particularly in the near term. Moreover, averaging TOC scores across multiple station areas can dilute strong progress in one area due to conditions in another, particularly in cities like Campbell which are behind in policy implementation efforts and have a higher-than-average number of stations per capita.
- Alignment with HCD's Prohousing Designation Program: Several TOC policy requirements overlap with strategies recognized in the State's Prohousing Designation Program administered by HCD, which incentivizes housing production through streamlined funding and regulatory benefits. The Housing Element certification process already evaluates development feasibility in detail, including factors like lot size, parcel readiness, and zoning capacity. MTC is strongly encouraged to align the TOC framework with the Prohousing scoring methodology, and to credit jurisdictions that have adopted RHNA-compliant zoning, exceeded their RHNA allocations, or implemented other HCD-validated strategies to facilitate housing near transit. This would ensure consistency between regional and state housing objectives and prevent duplicative or contradictory compliance efforts.
- Set-aside Incentive for Top Tier Jurisdictions: An MTC staff slide presentation at the April 9 VTA Technical Advisory Committee (TAC) mentioned a "Set-aside incentive for the top tier" (i.e., fully compliant jurisdictions). This particular slide

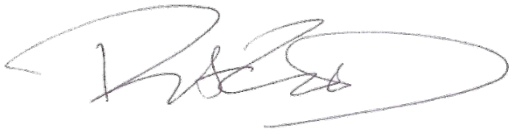
showed a bell-shaped curve but did not indicate what amount or percentage of OBAG 4 funds would be set aside. We are concerned that no jurisdictions in Santa Clara County will qualify for the fully compliant tier. Santa Clara County is the most populous county in the Bay Area. To set aside funds for a handful of top tier jurisdictions works against geographic equity.

To ensure the TOC Policy is a realistic and equitable tool for all jurisdictions, Campbell recommends the following refinements:

- **Phase-In Compliance:** Implement a phased scoring approach that awards full credit based on increasing compliance over time. For example:
 - By 2026: One-third of policy areas compliant to receive full credit
 - By 2027: Two-thirds compliant to receive full credit
 - By 2028: Full compliance across policy areas to receive full credit
- **Allow Per-Station Scoring:** Jurisdictions should be allowed to earn full points, and qualify for funding, for individual TOC areas that meet all applicable criteria, even if other areas within the city are still in progress.
- **Rebalance Scoring Weights:** Reduce emphasis on criteria that are legally preempted (e.g., parking caps, density requirements), economically infeasible (e.g., office FAR, parking maximum standards), or duplicative of state mandates (e.g., AB 2097). Increase weighting for local strategies that align with HCD's Prohousing Designation program or demonstrate meaningful advancement of Plan Bay Area 2050 goals.
- **Support Legal and Technical Implementation:** If MTC retains standards vulnerable to legal override (e.g., through Density Bonus Law concessions or waivers), the agency should provide model findings, technical documentation, or regional legal support to assist jurisdictions in defending or implementing these standards.
- **Award OBAG 4 Funds Based on Project's Merit:** Award of OBAG 4 funds should be based on the merits of a project. Use a scoring system that awards points on a tiered scale based on the level of TOC policy compliance. Do not preemptively set aside OBAG 4 funds.

We look forward to continued engagement with MTC as the TOC Policy implementation process moves forward. Please feel free to contact me at (408) 866-2141 or by email at robe@campbellca.gov if any clarification is needed regarding our comments.

Sincerely,

A handwritten signature in black ink, appearing to read 'Rob Eastwood', enclosed within a large, loopy oval shape.

Rob Eastwood, AICP
Community Development Director

cc: Brian Loventhal, City Manager
Amy Olay, Interim Public Works Director
Eloiza Murillo-Garcia, Housing Manager
Stephen Rose, Senior Planner
Matthew Jue, Traffic Engineer
Sophie Gabel-Scheinbaum; via email at sgabel-scheinbaum@bayareametro.gov

May 8, 2025

Eli Kaplan and Sophie Gabel-Scheinbaum
Metropolitan Transportation Commission
Bay Area Metro Center
375 Beale Street
San Francisco, CA 94105

RE: Morgan Hill's Comments on the Draft MTC TOC Policy Scoring Framework

Mr. Kaplan and Miss Gabel-Scheinbaum:

The City of Morgan Hill appreciates the opportunity to comment on the draft Transit-Oriented Communities (TOC) Evaluation Criteria Framework and its role in OBAG 4 funding eligibility. While supportive of TOC goals, we are concerned that the Framework doesn't consider existing market conditions and may discourage transit-oriented development.

Morgan Hill has recently adopted an updated Housing Element which includes a focus on transit-oriented development around our Caltrain station. We support the regional vision but find that the current framework's prescriptive requirements may not be feasible or effective for all jurisdictions, including Morgan Hill, given local constraints and recent planning efforts.

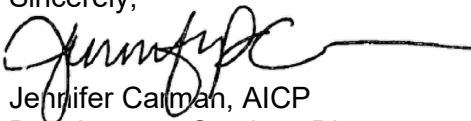
The proposed emphasis on residential density requirements in the Transit-Oriented Communities (TOC) policy doesn't align with current market realities where high-density housing can be financially challenging, and it risks duplicating recent local updates driven by RHNA 6 while state laws increasingly limit local control over density. Similarly, tying significant points to maximum parking standards presents issues as state laws already mandate the elimination of parking minimums, and the proposed low maximum ratios are often impractical in areas with limited transit access, potentially deterring developers. Furthermore, mandating minimum office FARs or commercial stabilization policies overlooks the post-pandemic increase in commercial vacancies, suggesting that jurisdictions should have the flexibility to pursue alternative strategies like adaptive reuse. The policy's planning and investment expectations could strain smaller jurisdictions or leave them out of contention for much needed grant funding.

To ensure a realistic and equitable TOC Policy, Morgan Hill recommends:

- **Reduce Set-aside Incentives for Top Tier Jurisdictions:** Any funds set aside for Top Tier Jurisdictions should be minimal to eliminate the inequitable distribution of funds to only specific regions.
- **Award OBAG 4 Funds Based on Project's Merit:** Base funding on project merit using a tiered scoring system, rather than preemptively setting aside funds.

The City of Morgan Hill has heavily relied on OBAG funding to meet the transportation needs of our community and is committed to working with the MTC to ensure our community and all communities have an equitable chance at receiving funding. We look forward to continued engagement with MTC. Please contact me or Adam Paszkowski, Principal Planner (adam.paszkowski@morganhill.ca.gov) with any questions.

Sincerely,



Jennifer Calman, AICP

Development Services Director
MTC Planning Committee and ABAG Administrative Committee

May 9, 2025

Page 6 of 18

Correspondence Received
Agenda Item 8a

From: [Martha Silver](#)
To: [Martha Silver](#)
Subject: FW: Joint Planning Committee - Agenda Item 8a - Mountain View Comments
Date: Thursday, May 8, 2025 1:13:22 PM

From: Anderson, Eric B. <Eric.Anderson2@mountainview.gov>
Sent: Monday, May 5, 2025 4:50 PM
To: Eli Kaplan <ekaplan@bayareametro.gov>; Sophie Gabel-Scheinbaum <sgabel-scheinbaum@bayareametro.gov>
Cc: Sighamony, John <John.Sighamony@vta.org>; Blizinski, Amber <Amber.Blizinski@mountainview.gov>
Subject: Draft comments on MTC TOC Policy evaluation criteria - City of Mountain View

Hello,

Please find below draft comments from the Mountain View Planning Division regarding the MTC TOC policy draft evaluation criteria. Please note, I may send updated comments later in the week. Thank you very much for the opportunity to comment.

General

- Thank you for considering a points-based approach. This will allow jurisdictions to identify and carry out incremental actions that can improve their compliance with the Policy. This is especially important because the area surrounding transit stations are often made up of several different zoning districts, neighborhoods and existing conditions. Cities are often unable to amend all of them at the same time.
- A jurisdiction-wide score is not meaningful and only benefits very small jurisdictions. If a jurisdiction is applying for a grant that serves a particular station area, the scoring should only count (or weight toward) that station area.

Densities and Intensities

- In general, we support giving more points to residential than commercial office densities. This is consistent with the needs of many communities to provide more housing opportunities in these key growth areas.
- Please consider lowering the percent for “partial” and “substantial” compliance for minimum densities. This would be to acknowledge that the existing zoning frequently includes a maximum density/intensity, but no minimum. Consider the following hypothetical example – A city is rezoning 50% of the area around a transit station that would be subject to the Tier 3 density averages. The remaining 50% has no minimum density but an average maximum density of 40 units per acre. While the city could approve a maximum density of at least 72 units per acre and get some points for maximum density, they would have to approve a minimum density of at least 76 units per acre (higher than the maximum) to receive any points in that category.

Parking

- Compliance with the minimum automobile parking policy should be met if the local code is consistent with AB 2097, even if AB 2097 is not directly referenced.
- Maximum parking standards may vary within the ½-mile radius. Please consider ways to achieve partial points when portions of this area may not have maximum parking standards, or may have higher maximum parking standards than others. For example, “Substantial compliance” could be either as drafted or XX% of the residential/commercial area (as designated in the density/intensity policies) that meets the standard. This comment should also apply to the bicycle parking standards.
- The City of Mountain View does not prohibit unbundled parking. However, it is implemented through a standard condition of approval. Please allow other ways to show compliance with these policies, besides an adopted policy.
- Please clarify the minimum portion of the ½-mile radius area that a given parking management policy must apply to.



Eric B. Anderson, AICP

Advance Planning Manager

Community Development Department | Planning Division

650-903-6306 | MountainView.gov

[Twitter](#) | [Facebook](#) | [Instagram](#) | [YouTube](#) | [AskMV](#)



May 7, 2025

Sophie Gabel-Scheinbaum
Metropolitan Transportation Commission (MTC)
Bay Area Metro Center
375 Beale Street, Suite 800
San Francisco, CA 94105-2066

Re: Draft Evaluation Criteria for MTC's Transit Oriented Communities (TOC) Policy Compliance

Dear Miss Gabel-Scheinbaum:

On behalf of the Santa Clara Valley Transportation Authority (VTA), thank you for the opportunity to submit comments on the draft scoring criteria for MTC TOC Policy compliance. VTA supports efforts to help grow communities and neighborhoods surrounding transit as a way to increase transit ridership, meet our region's housing needs, improve equity, and establish complete communities. As this process moves forward, we want to make sure the process for compliance can be attainable for our Member Agencies. This letter represents a combination of comments from VTA staff and key feedback we have heard in recent weeks from our local agency partners.

General Feedback

- VTA recommends reducing the level of detail and amount of documentation involved in the TOC Policy compliance process, to the extent possible. The proposed framework appears very burdensome, especially for smaller jurisdictions and those with multiple TOC areas.
- VTA encourages MTC to provide technical assistance to local jurisdictions to complete their assessment of compliance with the MTC TOC Policy. Since MTC recently made funds available to jurisdictions through the *Transit-Oriented Communities (TOC) and Climate Program Implementation Grants: 2024 Coordinated Call for Projects*, we encourage MTC to offer technical assistance to help jurisdictions assess their compliance with these regional policies. Ideally, such assistance would be offered in a way where MTC would manage the consultant contract(s), minimizing administrative burden for local jurisdictions.

Connection to the One Bay Area Grant Program (OBAG 4)

- Since MTC TOC Policy compliance is just one component of the proposed OBAG 4 eligibility process, VTA staff would like to understand how the other OBAG 4 eligibility items, such as the TPPR and Complete Streets Checklist compliance, will be coordinated. It could be burdensome for a local jurisdiction to go through multiple compliance reviews to be eligible for funding, unless they are closely coordinated.
- In presentations to countywide groups in early 2025 (such as the VTA Community Design & Transportation Network Meeting in February), MTC staff showed a slide titled “Initial TOC Policy Compliance Considerations for OBAG 4” that included a reference to a “set-aside incentive for top tier” (i.e., Compliant Jurisdictions). While that reference appears to have been removed from MTC presentations in April 2025 (e.g., to the VTA Technical Advisory Committee), VTA requests that MTC staff clarify whether an OBAG4 funding set-aside incentive is still being considered and if so, how it would work and how much money would be involved. If such a set-aside is included, VTA recommends that this be only a small amount of additional funding, similar to what cities that achieve the HCD Prohousing designation are eligible for.

Parking Maximums

- VTA staff is not aware of any local jurisdictions in Santa Clara County that have formal parking maximums across their TOC areas, and based on numerous conversations with local agency staff it is clear that the market would not support parking maximums anywhere near the levels in the MTC TOC Policy. Under the current draft evaluation criteria, all jurisdictions in Santa Clara County would likely lose 12 points at the start, which means that they would have almost no room to lose any other points to meet the 85-point threshold for full compliance. Therefore, it appears to VTA staff that no local jurisdictions in Santa Clara County would be able to be fully compliant under the proposed criteria – a result that seems inequitable and that does not reflect strong progress being made towards promoting TOCs and transit-supportive development.
- To address the above concern, VTA recommends that the point value for Parking Maximums should be reduced considerably. Some points toward "partial compliance" could also be given for jurisdictions that do not have mandatory maximums, but which have incentives to provide lower parking ratios, such as ordinances that require TDM measures and that give “points” for parking a development at a lower ratio.

Density / FAR Concerns

- In general, VTA staff has heard concerns from local jurisdictions in Santa Clara County about the minimum density requirements in the MTC TOC Policy, and therefore also in the draft evaluation criteria. Some specific concerns that VTA staff have heard from local jurisdictions include the infeasibility of establishing minimum density / FAR requirements in some areas due to lack of market demand and redundancy of some MTC TOC policy areas / criteria given recent state legislation such as AB 2097, SB 330, SB 423, and updates to the State Density Bonus Law.

VTA is a committed partner in increasing the alignment of our local jurisdiction policies with the MTC TOC Policy. VTA's support includes our Transit-Oriented Communities Grant program which has a Planning & Policy Implementation funding category geared towards local jurisdiction efforts; the Notice of Funding Availability for the second round of this grant program was just issued on May 5, 2025. VTA will continue to monitor the development of the MTC TOC Policy requirements, and we look forward to continuing to engage with MTC in preparation for the OBAG 4 Program.

Sincerely,

DocuSigned by:

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Jessie O'Malley-Solis
Director of Multimodal Planning & Real Estate
Santa Clara Valley Transportation Authority

CC: Rahul John Sighamony
Robert Swierk
Aaron Quigley
Deborah Dagang
Melissa Cerezo



CITY OF
**PALO
ALTO**

Jonathan Lait
Planning and Development Service
Director

May 6, 2025

Eli Kaplan
Regional Planning Program
Metropolitan Transportation Commission
375 Beale Street San Francisco, CA 94105
ekaplan@bayareametro.gov

RE: Palo Alto's Comments on the Draft MTC TOC Policy Scoring Framework

Dear Mr. Kaplan:

The City of Palo Alto appreciates the opportunity to provide comments on the draft Transit-Oriented Communities (TOC) Policy Scoring Framework and supports the regional objective of encouraging equitable, transit-supportive development. The City also recognizes the importance of aligning transportation investments with land use decisions.

As drafted, the scoring framework would benefit from refinements to better reflect jurisdictional control, local implementation capacity, and the evolving legal and policy environment surrounding housing and transportation planning. Our feedback focuses on five key areas:

1. Station Scoring Should Account for Cross-Jurisdictional Differences

The current scoring approach averages all TOC station areas within a jurisdiction, even when the station itself is located in a neighboring city. This is a particularly problematic in cases like the San Antonio Station, which is in Mountain View but includes about 25% of the one-half mile radius area within Palo Alto's boundary. Averaging across such areas can dilute strong performance elsewhere, such as near the University Avenue Station. It is recommended that MTC consider alternatives such as using a weighted average based on the share of the station area within the jurisdiction, or limiting station access scoring to stations physically located within the jurisdiction.

2. Office FAR Requirements Should Consider Jobs-Housing Imbalances

The framework's emphasis on minimum office floor area ratios does not adequately account for existing jobs-housing disparities. According to Palo Alto's 2023–2031 Housing Element, the city has among the highest jobs-to-resident-workers ratio in the region. Requiring additional office development in such contexts may run counter to broader regional equity and housing accessibility goals. Moreover, the economics of adding new office space in a saturated market may be less financially viable than pursuing housing-focused development, particularly for projects seeking to deliver exclusively residential uses. We encourage MTC to offer flexibility for jurisdictions with a demonstrated jobs-housing imbalance, including the ability to meet this metric through alternative strategies.

3. Set-Aside Funding Should Not Preempt Local Eligibility

We understand the TOC framework may include a funding set-aside for jurisdictions classified as “fully compliant.” While we understand the interest in recognizing strong policy alignment, exclusive set-asides risk reducing access for cities that are actively implementing supportive policies but may not yet meet every metric. We recommend a tiered scoring approach that allows all compliant and partially compliant jurisdictions to be considered for OBAG 4 funds, with performance-based scoring informing prioritization but not serving as a gating mechanism.

4. Recognize Overlap Between TOC and State Housing Programs

The TOC scoring framework shares several objectives with the State’s Prohousing Designation program, but the two systems have different metrics and compliance requirements. This means jurisdictions are often chasing different targets for state compliance and for regional compliance. We recommend that MTC consider how TOC scoring criteria can be better aligned with state housing programs to support consistent expectations and reduce administrative burden.

5. Consider Alignment with State Housing Laws and Regulatory Context

Cities must navigate a growing number of state housing laws that influence local land use decisions, including AB 2097, SB 35, Density Bonus Law, and others. These laws affect project feasibility, streamline approvals, and establish by-right entitlements that operate alongside or independently of local policies. The resulting regulatory environment is complex and continues to evolve. We recommend that MTC align the TOC scoring framework with this broader legal context to ensure local implementation efforts can be effectively integrated and are not inadvertently working at cross-purposes.

We appreciate MTC’s efforts to support equitable, transit-connected communities across the Bay Area and welcome further opportunities to engage during the TOC framework implementation process. If you have any questions regarding these comments, please contact Robert Cain, Senior Planner at (650) 838-2892 or robert.cain@pal Alto.gov.

DocuSigned by:

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Jonathan Lait, Director
 Planning and Development Service

May 7, 2025

Re: Regional Transit Funding

To: SamTrans Board
SMCTA Board
C/CAG Board

CC: Caltrain Board
Metropolitan Transportation Commission

Honorable Commissioners and Board Members,

We urge you to support a regionally coordinated strategy to fund public transportation, to address the fiscal cliff facing agencies including BART and Caltrain, and to ensure progress on regional transit coordination initiatives that make the system more user-friendly and that are helping to regrow transit ridership.

Over the last five years, the region has been making significant progress with an all agency transit pass pilot that has increased ridership by 40% among participants, better service coordination, and easy to use, coordinated signs that help easily get where they are going. Our counties have the opportunities to rise to the occasion and participate in a regionally coordinated approach to transit funding.

In poll after poll, voters say that they want to prevent transit service cuts, and they want the system to be more convenient and better coordinated.

To get voter support, we will need a strategy that makes the public transportation system better. It will be difficult to ask voters to increase taxes for a measure that will deliver service cuts and that ends initiatives to improve coordination, rather than continuing and improving.

Without this funding, Caltrain, BART, and the region's other highest ridership agencies will face major service cuts, which will limit access, reduce transit ridership, add to greenhouse gas emissions, and compound traffic congestion. Improving public transportation will help boost our economy, make the Bay Area more affordable for all residents, connect our communities, help reach our housing goals, and increase accessible and safe mobility options for all.

Agencies and counties have been negotiating to ensure that funding options fairly address local needs. Thanks for supporting local needs while ensuring that we save, improve, and coordinate service.

Sincerely,

<p>Evelyn Stivers Housing Leadership Council of San Mateo County</p> <p>Jordan Grimes Greenbelt Alliance</p> <p>Matthew Jones Silicon Valley Bicycle Coalition</p> <p>Ben McMullan Center For Independence of Individuals with Disabilities San Mateo County</p> <p>Sandra Lang Peninsula ParaTransit Advisory Committee</p> <p>Sarah Hubbard Sustainable San Mateo County</p> <p>Lauren Weston Executive Director Acterra: Action for a Healthy Planet</p> <p>Leora Tanjuatco Ross Peninsula for Everyone</p> <p>Karen Grove Menlo Together</p> <p>Adina Levin Seamless Bay Area</p>	<p>Juslyn Manalo Daly City City Council Member</p> <p>Tom Hamilton San Bruno City Council Member</p> <p>James Coleman South San Francisco City Council Member</p> <p>Isabella Chu Redwood City City Council Member</p> <p>Chris Sturken Redwood City City Council Member</p> <p>Betsy Nash Menlo Park City Council Member</p> <p>Adam Loraine San Mateo City Council Member</p> <p>Phoebe Shin Venkat Foster City City Council Member</p> <p>Rick Bonilla Former Mayor, City of San Mateo</p> <p>Auros Harman San Bruno Planning Commission Chair</p> <p>Max Mautner, San Mateo SamTrans CAC Member</p> <p>John Baker South San Francisco Planning Commissioner</p> <p>John Ebnetter San Mateo Planning Commissioner</p> <p>Katie Behroozi Menlo Park Planning Commissioner</p>
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May 8, 2025

Eddie Ahn, Chair

Metropolitan Transportation Commission (MTC) Planning Committee

Bay Area Metro Center

375 Beale Street, Suite 800

San Francisco, CA 94105 -2066

RE: Item 8a: Transit Oriented Communities (TOC) Draft Evaluation Framework

Dear Chair Eddie Ahn and MTC Planning Committee:

On behalf of the Bay Area County Transportation Agencies (BACTA), we want to express our appreciation for MTC's leadership and partnership in advancing transportation and land use policy solutions for the region. We appreciate the opportunity to comment on the Draft Evaluation Framework for the Transit Oriented Communities (TOC) Policy and understand that the long-term TOC Policy goals have the potential to advance transit supportive development and transit ridership throughout the region.

Our comments focus on the near-term application of the TOC Policy in the context of the upcoming OBAG 4 funding cycle. OBAG funds are a major tool for implementing the strategies in Plan Bay Area 2050+ and are critically important to our local jurisdictions.

Status of TOC Compliance is Unclear

Well over two years since policy adoption, the status of TOC compliance for any jurisdiction or TOC area in the region is still unclear. Without access to clear, up-to-date information regarding the compliance status of individual jurisdictions, it is difficult to review or comment on the proposed evaluation framework for near-term transportation funding. BACTAs and jurisdictions themselves will be unable to evaluate TOC Policy compliance to inform the development of our county OBAG 4 cycles and for jurisdictions to understand if they are eligible to apply for funding.

A complicating factor in TOC compliance is the timing of the administrative guidance relative to state housing policy implementation. Jurisdictions had just finished/completed Housing Elements, including rezoning and increasing densities with their councils. For many jurisdictions, the TOC policy elements require cities/towns/counties to amend their general plans and increase densities again to achieve minimum average densities.

We suggest working with BACTA staff to clarify how the TOC Policy compliance can be applied overtime acknowledging competing policy priorities imposed on local jurisdictions.

Overall Program Complexity and Feasibility

We are concerned that the proposed complexity of the TOC program may not lead to meaningful progress toward its stated goals. Many local jurisdictions have limited staffing and resources, and the complicated compliance assessment will be a substantial effort. It is possible that an unintended consequence will be to drive jurisdictions away from interest in supporting this type of policy, an outcome that is surely undesirable for the region. The resource strains are particularly notable as state housing regulations also are becoming more complex, and local agencies are also faced with increasing economic uncertainty.

For near term funding applications, we suggest considering a shift from the current draft evaluation scorecard to a more qualitative or phased assessment until MTC has a clearer understanding of how close or far jurisdictions are from meeting compliance.

Concern About Timing and Funding Certainty

The current timing of TOC compliance determinations relative to the OBAG 4 cycle presents a challenge. We strongly recommend extending the deadline for TOC compliance and that decisions related to compliance status, evaluation criteria, and funding eligibility be finalized before major OBAG 4 program decisions are made, which includes any proposed funding set-asides for compliant TOCs. As seen in the current OBAG 3 cycle, delays related to housing element compliance created prolonged uncertainty for jurisdictions, which negatively impacted local planning and project delivery.

Support for MTC's Role in Housing-Transportation Integration and Technical Assistance

Supporting local jurisdictions with housing and transportation integration remains a very important and useful role for MTC. Previous programs from MTC have shown that MTC can advance local jurisdictions housing element implementation in a supportive relationship, i.e. the Regional Early Access Planning Funds (REAP), Housing Incentive Program (HIP) and the Transportation for Livable Communities Program. Generally, these successful programs have focused on providing technical assistance and funding. We appreciate the efforts of MTC providing technical assistance to jurisdictions to help achieve TOC compliance.

Encouraging Progress Without Penalizing Non-Compliant Jurisdictions

Meaningful progress can be made by supporting existing housing element implementation at these sites, while supporting planning efforts to bring jurisdictions into compliance.

Thank you for your consideration and for what we anticipate will be an early and ongoing partnership throughout this year as discussions around TOC policy and OBAG4 considerations evolve.

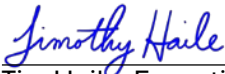
Sincerely,



Carolyn Clevenger, Interim Executive Director
Alameda County Transportation Commission



Tilly Chang, Executive Director
San Francisco County Transportation
Authority




Tim Haile, Executive Director
Contra Costa Transportation
Authority



Sean Charpentier, Executive Director
City/County Association of Governments
of San Mateo County



Anne Richman, Executive
Director Transportation
Authority of Marin



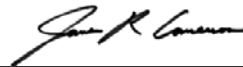
Deborah Dagang, Chief Planning &
Programming Officer
Santa Clara Valley Transportation Authority



Kate Miller, Executive Director
Napa Valley Transportation
Authority



Daryl Halls, Executive Director
Solano Transportation Authority



James Cameron, Executive Director
Sonoma County Transportation
Authority

cc: Andrew Fremier, Executive Director, MTC
Alix Bockelman, Chief Deputy Executive Director, MTC
Matt Maloney, Deputy Executive Director, Metro Planning & Policy, MTC