



June 3, 2022

Therese McMillan, Executive Director
Metropolitan Transportation Commission/Association of Bay Area Governments
Bay Area Metro Center
375 Beale Street, Suite 800
San Francisco, CA 94105-2066

Dear Ms. McMillan,

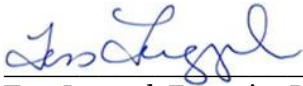
The Bay Area County Transportation Agencies (BACTA) appreciate the important work MTC is performing on the development of the Transit Oriented Communities (TOC) Policy as a means to support implementation of PBA 2050. We also appreciate the numerous meetings your staff have had with us during the development of the policy and for addressing many of our comments. We understand that the TOC policy is slated for approval at your July Commission meeting and would like to share a few specific comments germane to all the CTAs below. In addition, individual CTAs may also be submitting additional separate comments. There are six areas of interest that the CTAs would like to see addressed prior to the TOC Policy adoption in July to enable informed decisions and to allow us to advise our policy makers and jurisdictions:

- Finalize a baseline assessment of how the proposed density and policy changes compare with the existing conditions in the approved PDAs. This is critical for CTAs and local jurisdictions to determine the extent of increase in density that is being recommended.
- Provide a detailed map of where the TOC policy would apply, and a list of which PDAs or TRAs would be included in it. This would be especially helpful for counties that have many PDAs. (For reference, San Mateo County has 25 PDAs, Alameda County has 48 PDAs).
- Consider adjustments to the 4-year timeframe for jurisdictions to rezone the areas for compliance with the TOCs. Local jurisdictions are devoting significant time and resources to updating their housing elements. If an adopted TOC policy requires updated PDA specific plans or new specific plans for areas within a TRA, there may not be sufficient time to complete the rezoning within the 4-year timeframe. Jurisdictions will have to pivot from the resource-intensive housing element update to immediately start on Specific Plan efforts to comply with the TOC Policy. A Specific Plan update can easily take several years. If many of the PDA Specific Plans have to be updated, it will be exceedingly challenging to accomplish that in the 4-year timeframe.
- Clarify the implications for PDAs for which the policy doesn't apply or for areas where there are fixed guideway stations outside of PDAs – in either of these cases, clarify if they would be eligible for future OBAG funds.
- Clarify whether or how the TOC Policy would be used in the future to determine funding distributions, including which fund sources would be considered for alignment with the TOC policy.

- Clarify the implications for a fixed guideway corridor when one jurisdiction (of many on the corridor) may not be in compliance with the policy: which agencies would be affected and what would be the funding ramifications.

Again, we appreciate the collaboration with your staff on the development of the TOC policy and seek your responses to the above items in a manner that would allow us enough time to evaluate and coordinate with our jurisdictions and policymakers prior to adoption of the TOC policy.

Sincerely,



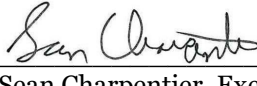
Tess Lengyel, Executive Director
Alameda County Transportation Commission



Tilly Chang, Executive Director
San Francisco County Transportation Authority



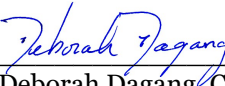
Tim Haile, Executive Director
Contra Costa Transportation Authority



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



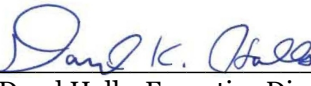
Anne Richman, Executive Director
Transportation Authority of Marin



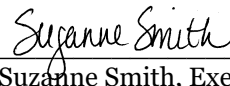
Deborah Dagang, Chief Planning & Programming Officer
Santa Clara Valley Transportation Authority



Kate Miller, Executive Director
Napa Valley Transportation Authority



Daryl Halls, Executive Director
Solano Transportation Authority



Suzanne Smith, Executive Director
Sonoma County Transportation Authority

cc: Alix Bockelman, Deputy Executive Director, Metropolitan Transportation Commission
Matt Maloney, Director, Regional Planning, Metropolitan Transportation Commission