From: Leano Atanacio, Amiel
To: MTC-ABAG Info
Cc: Marcus, Justine
Subject: MTC Planning Committee Meeting - Item 8a
Date: Thursday, May 7, 2026 4:32:59 PM
Attachments: image.png
May 8 MTC Planning Meeting Comment Letter_ Item 8a.pdf

External Email

Hello,

Please find our coalition comment letter for the MTC Planning Committee Meeting, Agenda Item 8a: MTC Resolution No. 4530, Revised. Transit-Oriented Communities (TOC) Policy, attached.

Thanks!

Best,
Amiel

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Program Manager, State & Local Policy
Northern California

enterprisecommunity.org

May 7, 2026

Re: May 8, 2026 MTC Planning Committee Meeting
Item 8a: MTC Resolution No. 4530, Revised. Transit-Oriented Communities (TOC) Policy

Dear Commissioners:

We appreciate the Commission and staff for the ongoing work on the Transit-Oriented Communities (TOC) Policy, including this current discussion of transit extensions. As the Bay Area grapples with a transit fiscal cliff, it is imperative that MTC ensures its future investments in transit extensions are sound and financially sustainable. With ridership being the primary driver of transit revenue, the TOC Policy presents a strong path for transit recovery and long-term financial sustainability.

The TOC Policy reimagines the region where Bay Area individuals and families have the opportunity to live in beautiful neighborhoods where they can walk, bike, or take transit to go to school or work, spend the afternoon at the park with their children, or pick up groceries or medications at a pharmacy. Therefore, TOC Policy compliance is integral to the success of any future transit project in the Bay area.

We supported the passage of the TOC Incentive Program in March 2026 as a regional compromise to move the TOC Policy forward and encourage jurisdictions to make progress towards our climate, housing, and transportation goals. However, it has been our consistent position that the partial compliance approach - the current TOC Evaluation Framework's 85-point compliance threshold - is a transitional approach to give jurisdictions time to come into compliance; it should be short-term and time-bound. **Full compliance must remain as the long-term goal of the TOC Policy.**

For these reasons, we support staff's proposal to extend the timeline for TOC Policy Compliance for transit extension projects to before construction or at least 5 years (whichever is longer), given the timeline of actually building these projects, but this extended timeline must then require full compliance at the end of the period. While we support aligning transit extension requirements with the TOC Incentive Program, the compliance threshold in the proposed amendments would undermine the long-term goals of the TOC Policy and Plan Bay Area 2050+.

1. **A longer timeline for compliance should be accompanied with a requirement for compliance.** While we agree with removing the 2026 deadline for transit extensions due to the updated 2027 timeline in the TOC Incentive Program, applying the same 85-point threshold that jurisdictions must meet to receive OBAG 4 funding undermines the TOC Policy in the long-term. Setting a compliance timeline of the later date between "prior to construction" or within 5 years after an allocation/endorsement is reasonable. This also provides jurisdictions more than adequate time to work towards full compliance to the TOC Policy.

2. **Maintaining the 85-point threshold beyond the 2027 compliance timeline under the TOC Incentive Program sets a precedent of partial compliance to the TOC Policy in the long-term.** Without detailed or certain timelines for when listed transit extensions will seek a funding

allocation or endorsement, the proposed threshold would create more uncertainty and stymie progress.

The success of transit extensions across the region are intertwined with the success of the TOC Policy. The four components of the TOC policy –i.e. density, parking, housing, and station access– work in a coordinated manner to deliver equitable transit-oriented communities. Given the twin imperatives of making the Bay Area more affordable for people of all incomes and growing transit ridership, we strongly encourage you to continue to uphold the goals of the TOC Policy through transit extensions.

Thank you again for your time, engagement, and consideration.

Respectfully,

Heather Hood
Vice President - Northern California
Enterprise Community Partners

Sophia DeWitt
Chief Program Officer
East Bay Housing Organizations

Zack Deutsch-Gross
Executive Director
Transform