



# STAFF REPORT

AGENDA NO: 11d

MEETING DATE: July 7, 2025

**To:** Honorable Mayor and City Council

**Date:** July 7, 2025

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**Subject:** Discussion of the Metropolitan Transportation Commission's Transit-Oriented Communities Policy

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## **RECOMMENDATION**

Staff recommends that the City Council provide direction on the Transit-Oriented Communities (TOC) Policy.

## **BACKGROUND**

The Metropolitan Transportation Commission (MTC) is the transportation planning, financing, and coordinating agency for the San Francisco Bay Area. In 2021, MTC and the Association of Bay Area Governments (ABAG) adopted Plan Bay Area 2050, the region's long-range plan for transportation, housing, economy, and the environment.

The Federal Highway Administration (FHWA) provides MTC with funding for investments in roads, highways, public transit, bicycle, and pedestrian projects. MTC's program to guide distribution of the region's share of FHWA funding is through One Bay Area Grant (OBAG). There have been three rounds of OBAG funding, and the City has received close to \$6 million from this source.

MTC adopted a Transit-Oriented Communities (TOC) Policy in 2022 with revisions made in 2023. The TOC Policy is an implementation policy of Plan Bay Area 2050 with the goal to "make it easier for people in the Bay Area to live a car-free or car-light lifestyle," by increasing the density of housing, jobs, and activities near stations, and improving connections around and between station areas. More information about the TOC Policy is available at the MTC website: <https://mtc.ca.gov/planning/land-use/transit-oriented-communities-toc-policy>

Compliance with the TOC Policy is voluntary; however, to qualify for future OBAG funding jurisdictions will be evaluated on a point system based on their compliance. MTC has advised jurisdictions to anticipate demonstrating compliance prior to the adoption of the OBAG-4 funding cycle, expected in early 2026.

The purpose of this discussion item is to receive City Council direction as to whether to pursue compliance and, if so, which elective path should be pursued.

## **DISCUSSION**

The TOC Policy is structured in four policy categories:

- Land Use Density and Intensity Standards (25 points)
- Affordable Housing and Anti-Displacement Policies (25 points)
- Parking Management Policies (25 points)
- Transit Station Access and Circulation (25 points)

Some of the policies apply to areas within a half-mile radius of transit stations, known as Station Areas, and some of the policies are citywide. The City of Burlingame has two Station Areas, the Burlingame Station and the Millbrae Station. The City recently received clarification from MTC that the TOC Policy does not apply to the Broadway Station given that there are stops only two days a week.

This section reviews the four TOC Policy categories and identifies where the City is consistent with the TOC Policy requirements, needs updates to existing policies, or would need to adopt new policies.

### **Land Use Density and Intensity Standards (Station Areas Only) – 25 points**

The TOC Policy establishes specific targets for the average minimum and maximum residential density (expressed in dwelling units per acre (du/ac)) and commercial office intensity (expressed in Floor Area Ratio (FAR)) within a Station Area.

Each Station Area is designated a certain Tier based on its service levels. These tiers have different density and parking management requirements. The Millbrae Station is a Tier 2 station, and the Burlingame Station is a Tier 3. The thresholds for compliance with each of these standards are outlined in the table below.

**Table 1 – Land Use Table**

		<b>Minimum Residential Density</b>	<b>Minimum Commercial Density</b>	<b>Maximum Residential Density</b>	<b>Maximum Commercial Density</b>
<b>Burlingame Station Tier 3</b>	TOC Required	50 du/ac	2.0 FAR	75 du/ac	4.0 FAR
	Current Regulations	None	None	None	None
	TOC Calculation	----	----		1.7 FAR average
<b>Millbrae Station Tier 2</b>	TOC Required	75 du/ac	3.0 FAR	100 du/ac	6.0 FAR
	Current Regulations	None	None	NBMU – 140 du/ac RRMU – 70 du/ac	NBMU – 2.0 RRMU – 1.0
	TOC Calculation	----	----	99 du/ac average	1.4 FAR average
		Not Compliant	Not Compliant	Partially Compliant	Not Complaint

For cities that do not have defined densities or FARs, the TOC Policy would allow the use of a minimum building height equivalency. The TOC Policy sets the process for a city to calculate the minimum densities and FAR. The minimum standards can be averaged over the applicable lands around the station. The average minimum only applies to lands that allow residential or office uses by right. Lands already occupied with residential units do not have to be included in the calculation of average density, allowing existing residential neighborhoods to be removed from the minimum density consideration.

Burlingame does not have minimum residential densities or FARs in the Station Areas. In addition, the Burlingame Station Area does not have maximum residential densities and FARs. To be consistent with the TOC Policy, Zoning and Downtown Specific Plan amendments would be needed. Staff does not recommend amending City of Burlingame regulations to the density and intensity requirements. Instead, staff recommends focusing on the remaining three categories to achieve compliance with the TOC Policy.

### **Affordable Housing and Anti-Displacement Policies (Citywide) – 25 points**

The Affordable Housing and Anti-Displacement category identifies numerous policies in four groupings; cities must select seven policies to demonstrate TOC Policy compliance:

- Production (select minimum 2 of 7 options)
- Preservation (select minimum 2 of 8 options)
- Protection (select minimum 2 of 11 options)
- Commercial Stabilization (select minimum 1 of 4 options)

The tables below list the policies and those staff recommends pursuing to achieve TOC Policy compliance. Staff recommends adopting the policies that:

- Align with existing City policies;
- Align with Housing Element Implementation Programs (HEIP);
- Align with other goals and policies Council has expressed interest in pursuing;
- Require the lowest funding or resource commitments over time.

Should the City Council wish to pursue compliance with the TOC Policy, the City will accelerate its implementation efforts for the applicable HEIP policies. The recommended policies do not preclude the City Council from independently pursuing the other elective policies.

### **Production**

A minimum of two of the seven policies are required, and the staff-recommended policies are noted in bold text.

**Table 2 - Production Policies Table**

TOC Policy	Requirement
<b>Inclusionary Zoning</b>	<ul style="list-style-type: none"> <li>• Fulfills HEIP (C-4).</li> <li>• Applies to new projects with more than 11 residential units.</li> <li>• 15% affordable deed restricted units at an average of 80% AMI or less.</li> <li>• Have an in-lieu fee of at least \$100,000/unit.</li> </ul>
Affordable Housing Fund	<ul style="list-style-type: none"> <li>• Commit \$3M in funding for the production of deed restricted lower-income rental units and moderate-income ownership units for the OBAG-4 funding cycle.</li> </ul>
Affordable Housing Overlay	<ul style="list-style-type: none"> <li>• Provide incentives for the construction of affordable housing, beyond State law (State Density Bonus law, SB 35 Streamlining).</li> </ul>
<b>Public Land for Affordable Housing</b>	<ul style="list-style-type: none"> <li>• Fulfills HEIP (A-2).</li> <li>• Have a program in the Housing Element for redevelopment of public lands.</li> <li>• Offer public lands for the development of affordable housing, that exceeds the Surplus Land Act requirement of 25% lower-income units.</li> <li>• Create an inventory of “surplus”, underutilized, and other public agency sites that can be redeveloped.</li> <li>• Have staff dedicated to advancing the public lands program.</li> </ul>
Ministerial Approval	<ul style="list-style-type: none"> <li>• Grant ministerial approval of residential developments that include, at a minimum, 15% affordable units if projects have 11 or more units, or that exceed inclusionary or density bonus affordability requirements and do not exceed 0.5 parking spaces per unit.</li> </ul>
Public/Community Land Trusts	<ul style="list-style-type: none"> <li>• Commit \$3M in funding for CLTs and/or cooperatives to use for affordable housing production, or the jurisdiction or other public entities can use the funding to acquire and hold property that will be used for production of deed restricted lower-income rental units and moderate-income ownership units for the OBAG-4 funding cycle.</li> </ul>
Development Certainty and Streamlined Entitlement Process	<ul style="list-style-type: none"> <li>• Include the vested rights and five hearing limit provisions currently outlined in SB330 without a sunset date.</li> <li>• Adopt Protection Policy 2: No Net Loss and Right to Return to Demolished Homes, unless preempted by state or federal law.</li> </ul>

Staff recommends implementing the Inclusionary Zoning and Public Land for Affordable Housing policies in this category.

*Inclusionary Zoning:*

- Fulfills HEIP (C-4) which states: Update the residential impact fee in-lieu option to require a greater percentage of affordable units and/or deeper levels of affordability.
- Staff proposes an update to the onsite alternative option that developers may choose instead of paying the required Residential Impact Fee. The current onsite requirement is 10% moderate income units. Staff recommends increasing the requirement to 15% low income units available to households making no more than 80% of the Area Median Income (AMI), consistent with the TOC Policy.
- This will require a Zoning Code amendment.

*Public Land for Affordable Housing:*

- Fulfills HEIP (A-2) which states: Prioritize the redevelopment of city-owned surface parking lots for affordable housing. Prioritize the redevelopment of city-owned parking lots in the Downtown and Broadway areas for housing affordable to low, very low, and/or extremely low-income households. The City is committed to complying with the Surplus Land Act and will coordinate with potential developers to leverage commercial linkage fees for new developments. The City will be issuing an RFP for the 1500 Ralston Avenue site in the Sites Inventory in 2023. The City will monitor the process on the city-owned sites to ensure that the City maintains sufficient land to accommodate the RHNA during the planning period. By 2028, the city will make a determination if the sites will be available before the end of the planning period. If not, in an effort to maintain adequate sites, the city will reevaluate the current capacity and identify alternative site(s) as needed.
- The City is going through the Surplus Land Act process for Parking Lot H (1500 Ralston Ave), most of which is within the R-3 ( Medium-High Density Residential) Zoning District. If no affordable housing developer, school district, or park district offers fair market value for the property, then the City will offer the property to other housing developers. If more than 10 units are constructed on the property, at least 15% of the units must be affordable.
- Requires creating a comprehensive inventory of publicly owned sites to identify opportunities to produce affordable or mixed-income housing. The site inventory must include both land that qualifies as “surplus” under the Surplus Land Act and other currently underutilized sites owned by the jurisdiction and other public agencies (e.g., state, county, and local agencies, as well as other public entities such as school districts).

Alternatively, the Affordable Housing Fund Production Policy can be selected since there are adequate funds in the Affordable Housing Fund to meet the requirements of the policy.

## Preservation

A minimum of two of the eight policies are required; staff-recommended policies in bold text.

**Table 3 - Preservation Policies Table**

TOC Policy	Requirement
<b>Funding to Preserve Unsubsidized Affordable Housing</b>	<ul style="list-style-type: none"> <li>• Fulfills HEIP (E-3)</li> <li>• \$900,000 funding commitment over OBAG-4 funding cycle to preserve naturally occurring affordable housing.</li> <li>• The jurisdiction must establish criteria for borrower eligibility that require funding recipients to have experience with affordable housing preservation.</li> <li>• The program must establish a standard set of financing terms, including affordability requirements, at or below 80% AMI average.</li> </ul>
Tenant/Community Opportunity to Purchase (TOPA/COPA)	<ul style="list-style-type: none"> <li>• Provide tenants or nonprofits the right of first refusal to purchase a property at the market price when it is offered for sale, retaining existing residents and ensuring long-term affordability of the units by requiring resale restrictions to maintain affordability.</li> <li>• Defines eligible and exempt properties</li> <li>• Establishes timelines for notice of sale, offer period, time to close, funding source, and time to counter-offer under TOPA/COPA</li> </ul>
Single Room Occupancy (SRO) Preservation	<del>No SROs in Burlingame</del>
<b>Condominium Conversion Restrictions</b>	<ul style="list-style-type: none"> <li>• Fulfills HEIP (E-2)</li> <li>• Require units converted to condominiums be replaced 1:1 with comparable rental units or in-lieu fee, unless purchased by current long-term tenants or converted to permanently affordable housing with protections for existing tenants.</li> <li>• Allow existing tenants the first right to purchase</li> <li>• At the time of conversion, applicants require a Tenant Relocation Assistance Plan spelling out tenant protections, benefits, and relocation payments for any temporarily or permanently displaced residents.</li> </ul>
Public/Community Land Trusts	<ul style="list-style-type: none"> <li>• Commit \$900,000 in funding for CLTs and/or cooperatives to use for affordable housing production, or the jurisdiction or other public entities can use the funding to acquire and hold property that will be used for production of deed restricted lower-income rental units and moderate-income ownership units for the OBAG-4 funding cycle.</li> </ul>

Funding to Support Preservation Capacity	<ul style="list-style-type: none"> <li>\$900,000 funding commitment over OBAG-4 funding cycle for capacity building or other material support for community land trusts (CLTs) or other community-based organizations (CBOs) engaged in affordable housing preservation.</li> <li>Funding must maintain project management staffing for a minimum of four years at approximately 0.5 full-time equivalent (FTE).</li> </ul>
<del>Mobile Home Preservation</del>	<del>No mobile homes in Burlingame</del>
Preventing Displacement from Substandard Conditions and Associated Enforcement Activities	<ul style="list-style-type: none"> <li>Establish an amnesty program to waive fines and fees for property owners with occupied units constructed without the proper permits in exchange for bringing the unit into compliance with health and safety codes.</li> <li>Property owners would be required to submit a tenant habitability plan to the City and agree to rent their units to existing tenants after repairs are completed with reasonable limits on rent increases.</li> </ul>

Staff recommends the Funding to Preserve Unsubsidized Affordable Housing and Condominium Conversion Restrictions policies in this category.

*Funding to Preserve Unsubsidized Affordable Housing:*

- Fulfills HEIP (E-3) which states: Encourage use of available programs and housing funds to assist non-profit housing corporations in acquiring, rehabilitating and managing existing apartment units for long-term affordability.
- The City is establishing an Affordable Housing Fund Goals and Policies document, which includes preserving naturally occurring affordable housing as a goal to fund through a NOFA process. Since there are adequate funds in the Affordable Housing Fund (\$14.3M), this policy can be fulfilled.

*Condominium Conversion Restrictions:*

- Fulfills HEIP (E-2) which states: Maintain the existing zoning controls which prohibit conversion of residential rental projects with fewer than 21 units to condominiums.
- The City currently restricts condominium conversions for projects larger than 20 units. This TOC Policy requires several amendments to the existing policy that would require less staff time to develop and implement compared to other policy options. The TOC Policy requires that conversions (in this case, those proposed with fewer than 20 units) provide rental units at a 1:1 replacement rate or otherwise pay an in-lieu fee to mitigate the loss of rental housing stock. Any rental housing converted to condos must offer existing tenants the first right to purchase consistent with the Subdivision Map Act and submit a Tenant Relocation Plan to



the City. The City may choose to exempt projects based on specific affordability criteria or projects where 90% of existing tenants are able to purchase a unit in the new condo project.

Alternatively, the Public/Community Land Trusts or Funding to Support Preservation Capacity policies can be selected since there are adequate funds in the Affordable Housing Fund to meet the requirements of the policy.

### **Protection**

A minimum of two of the 11 policies are required; the staff-recommended policies are in bold text.

**Table 4 - Protection Policies Table**

TOC Policy	Requirement
Just Cause Eviction	<ul style="list-style-type: none"> <li>• Can help with HEIP (B-5), which states that during at least one public hearing, staff will review and strengthen tenant protections where possible with elected officials. Some examples include: increasing the time for tenant relocation payments from 1-3 months; extending just cause eviction protections to tenants regardless of tenure (rather than 1 or more years currently required by statute); etc.</li> <li>• The Just Cause ordinance must not have a sunset date; require landlords to file notices of termination of tenancy with a designated local government agency, such as a rent program/board or other city department; make the failure to file these notices with a designated agency an affirmative defense for a tenant in an eviction case.</li> <li>• Additionally, the ordinance must expand on other statewide just cause protections to either limit the legally recognized causes for eviction or expand the types of</li> </ul>
<b>No Net Loss and Right to Return to Demolished Homes</b>	<ul style="list-style-type: none"> <li>• Fulfills HEIP (A-4)</li> <li>• Adopt provisions of existing SB 330 Housing Crisis Act (1:1 replacement of units - including affordable units, right to return provisions, tenant relocation assistance, right of first refusal), without sunset date. Can get credit for Production Policy 7 - (Development Certainty and Streamlined Entitlement Process) too.</li> </ul>
Legal Assistance for Tenants	<ul style="list-style-type: none"> <li>• \$300,000 over the OBAG-4 funding cycle for investments or programs that expand access to legal assistance for tenants threatened with displacement.</li> </ul>



Foreclosure Assistance	<ul style="list-style-type: none"> <li>\$300,000 over the OBAG-4 funding cycle to support owner-occupied homeowners (up to 120% AMI) at-risk of foreclosure, including direct financial assistance (e.g., mortgage assistance, property tax delinquency, HOA dues, etc.), foreclosure prevention counseling, legal assistance, and/or outreach.</li> </ul>
Rental Assistance Program	<ul style="list-style-type: none"> <li>\$300,000 over the OBAG-4 funding cycle for rental assistance program for low-income households.</li> </ul>
Rent Stabilization	<ul style="list-style-type: none"> <li>Restricts annual rent increases based upon a measure of inflation or other metric, with provisions exceeding those established by AB 1482.</li> <li>Measure T, a voter initiative passed in 1987, prevents the City from adopting this without a ballot initiative. Measure T has the purpose of "protecting the right of real property owners to establish the price for which their property is sold, leased, rented, transferred or exchanged."</li> </ul>
Preventing Displacement from Substandard Conditions and Associated Code Enforcement Activities	<ul style="list-style-type: none"> <li>Helps advance HEIP (E-1)</li> <li>Cannot use this option if adopting it under Preservation Policy 8</li> <li>Establish an amnesty program to waive fines and fees for property owners with occupied units constructed without the proper permits in exchange for bringing the unit into compliance with health and safety codes.</li> <li>Property owners would be required to submit a tenant habitability plan to the City and agree to continue to rent their units to existing tenants after repairs are completed with reasonable limits on rent increases.</li> </ul>
Tenant Relocation Assistance	<ul style="list-style-type: none"> <li>Helps advance HEIP (B-5)</li> <li>Landlords must make relocation payments for all no-cause or no-fault evictions.</li> <li>Jurisdictions can limit assistance to 80% AMI or less.</li> <li>Relocation assistance must be equal to at least three months' fair market rent, unless another law (e.g., local, state, federal) requires a higher amount.</li> </ul>
<del>Mobile Home Rent Stabilization</del>	<del>No mobile homes in Burlingame</del>
Fair Housing Enforcement	<ul style="list-style-type: none"> <li>\$300,000 for policy, program, or investments that support fair housing testing, compliance monitoring, and enforcement.</li> </ul>

Tenant Anti-Harassment Protections	<ul style="list-style-type: none"> <li>• Helps advance HEIP (B-5)</li> <li>• The policy must grant tenants legal protection from unreasonable, abusive, or coercive landlord behavior; must define harassing behaviors; establish noticing requirements for landlords to provide tenants with an information sheet outlining anti-harassment protections; and establish penalties for landlords found to be in violation.</li> </ul>
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Staff recommends adopting the No Net Loss and Right to Return to Demolished Homes in this category and looks to City Council for guidance if pursuit of an additional policy in this category is desired. The Tenant Relocation Assistance, Just Cause Eviction, or Tenant Anti-Harassment Protections can be selected as they do not have associated funding commitments and assist with HEIP. All would require the adoption of new ordinances and ongoing enforcement.

*No Net Loss and Right to Return to Demolished Homes:*

- Fulfills HEIP (A-4) which states: Require new housing developments that replace existing units to build equal to or more than the number of units previously on the site, in compliance with density regulations.
- Staff already complies with no net loss law (requiring a 1:1 replacement of demolished units with units of comparable size, restricted to lower-income households if an applicable agreement applies at the property) and tenant relocation assistance requirements outlined in the Housing Crisis Act. Adopting this policy requires the City to formally adopt these provisions of the Housing Crisis Act into code with no sunset date.

### **Commercial Stabilization**

A minimum of one of the four policies are required; staff recommended policies are in bold text.

**Table 5 - Commercial Stabilization Policy Table**

TOC Policy	Status
Small Business and Non-Profit Overlay Zone	<ul style="list-style-type: none"> <li>• An overlay zone offers benefits such as an operating subsidy, eviction protections, and relocation requirements.</li> <li>• Jurisdictions must define “small business” and “community-serving non-profit” to establish the minimum requirements to qualify for protections.</li> <li>• Offer at least one protection or benefit specific to the community and expected to prevent displacement.</li> </ul>

Small Business and Non-Profit Preference Policy	<ul style="list-style-type: none"> <li>Establish a preference policy that prioritizes small businesses and non-profits when selecting new tenants by offering them the right of first offer. Jurisdictions may apply such a policy on publicly-owned properties, as part of the entitlement process for a new development, as a condition of a small business support program, or in other applicable circumstances.</li> </ul>
Small Business and Non-Profit Financial Assistance Program	<ul style="list-style-type: none"> <li>The jurisdiction must have a program with secured funding that provides financial assistance to stabilize small businesses and non-profits located in the TOC areas. The jurisdiction could choose to offer this assistance to businesses and non-profits in additional areas as well.</li> <li>Provide technical assistance and up-to-date information online regarding funding opportunities and deadlines.</li> </ul>
<b>Small Business Advocate Office</b>	<ul style="list-style-type: none"> <li>Provide a single point of contact for small business owners to connect with a technical support resource</li> </ul>

The City currently employs an Economic Development & Housing Specialist as a single point of contact for small business owners to connect with as a technical resource. This position is consistent with the requirements of the Small Business Advocate Office policy required under TOC Policy; therefore, no new programs or policies would be needed.

### **Parking Management Policies (Station Areas) – 25 points**

The TOC Policy requires eight parking management policies within the Station Areas, including parking minimums and maximums.

#### **Parking Minimums**

State law (AB 2097) prohibits the City from requiring parking minimums near major transit stops, including the Burlingame Station, Millbrae Station, and major bus lines such as El Camino Real and portions of California Drive. As a result, parking provided by an owner/developer in a new project near transit is voluntary.

HEIP (B-4) states the City will eliminate parking requirements for projects within 0.5 miles of transit as specified by AB 2097; Zoning Code amendments are in process to fulfill this requirement.

#### **Parking Maximums**

The TOC Policy requires the City to set parking maximums that would prohibit a developer from building more than the maximum allowed even if the developer wanted to provide more parking. Staff considers the parking maximum policy to be a controversial component of the TOC Policy.

**Table 6 – Parking Comparison Table**

		<b>Minimum Residential Parking</b>	<b>Minimum Comm/Office Parking</b>	<b>Maximum Residential Parking</b>	<b>Maximum Comm/Office Parking</b>
<b>Burlingame Station Tier 3</b>	TOC Required	None	None	1 space per unit	2.5 spaces per 1,000 square feet
	Current Regulations	1 - 0/1 bed 1.5 - 2 bed 2 - 3+ bed 0.75 – micro	1 space per 400 square feet	None	None
	AB 2097	None	None	----	----
<b>Millbrae Station Tier 2</b>	TOC Required	None	None	0.5 space per unit	1.6 spaces per 1,000 square feet
	Current Regulations	1 - 0/1 bed 1.5 - 2 bed 2 - 3+ bed 0.75 – micro	1 space per 400 square feet	None	None
	AB 2097	None	None	----	-----
		Compliant	Compliant	Not Compliant	Not Complaint

**Other Parking Policies**

In addition to the parking maximums and minimums, there are additional parking policies:

- Allow Shared Parking Between Different Land Uses
  - Currently allowed by the Municipal Code.
- Bicycle Parking Requirements
  - 1 secure space per unit required and met by current requirements.
  - 1 secure space per 5,000 occupied square feet required and met by current requirements.
- Allow Unbundled Parking (separate the cost of a parking space from rent/sales price of residential unit).
  - Parking may not be charged for without an approved plan but does not explicitly define unbundled parking.
  - May require amendment to Municipal Code Section 25.40.020.
- Adoption of one complementary parking management strategy for the Station Areas, selected from a menu of five options included in MTC/ABAG's Parking Policy Playbook
  - Burlingame currently has a citywide Transportation Demand Management (TDM) Policy for new development.
  - Municipal Code Chapter 25.43 covers the City's TDM Requirements, typically for projects larger than 10,000 square feet, and includes a variety of options to achieve compliance.
  - As this code section is already compliant, no further policies are needed.

Staff recommends fulfilling all of the Parking Management Policies other than the maximum parking requirements. Currently, only the unbundled parking policy would require a Zoning Code amendment.

## Station Access and Circulation – 25 points

All four policies are required; staff-recommended policies are in bold text. Generally, the City of Burlingame has policies and planning work consistent with the requirements of this category. Staff recommends continuing to implement projects identified in the Capital Improvement Project program and Bicycle and Pedestrian Master Plan.

**Table 7 – Station Access and Circulation Table**

Requirement	Status
Adopt a jurisdiction-wide Complete Streets Policy	Bicycle/Pedestrian Master Plan is consistent with OBAG 2 policies. The City has an adopted Complete Streets policy that may need amendments.
Prioritize implementation of active transportation projects in TOC area(s)	Implementation steps of Bike/Ped Master Plan are consistent with this goal. Some specific projects are listed in the Capital Improvement Project budget for FY 25-26.
Complete an access gap analysis and capital improvement program for station access	Consistent, Bike/Ped Master Plan includes access gap analysis.
Identify Mobility Hub planning and implementation opportunities in TOC area(s)	Bike/Ped Master Plan goals appear to be consistent; Burlingame has an existing Mobility Hub.

## Policy Compliance

MTC has developed a draft TOC Policy Evaluation Criteria Framework (attached) to outline the points available for compliance in each of the policies and categories. Overall, 100 points are available and grouped into three sections as outlined below. A jurisdiction must be at least partially compliant to qualify for OBAG-4 funding.

- (0-39 points) - Not Compliant
- (40-84 points) - Partially Compliant
- (85+ points) - Fully Compliant

Staff estimates that the City could conservatively qualify for **56 points**, as shown in the table below, which would place Burlingame in the partially compliant category eligible for funding. This is with the assumption that the policies the City already complies with and/or would fulfill through HEIP items are completed.

**Table 8 – Policy Compliance Estimate Table**

Land Use Density and Intensity		Affordable Housing Anti-Displacement		Parking Management		Station Access and Circulation	
Category	Points	Category	Points	Category	Points	Category	Points
Min Density	0/8	Production	4/8	Min Res	2/2	Complete Streets	3/3
Min FAR	0/4	Preservation	4/8	Min Comm	2/2	Active Transport	7/7
Max Density	6/8	Protection	4/8	Max Res	0/6	Access Gap	8/8
Max FAR	0/5	Commercial Stabilization	1/1	Max Comm	0/6	Mobility Hub	7/7
				Bicycle	6/6		
				Unbundled Parking	0/1		
				Shared Parking	1/1		
				Parking Mgmt	1/1		
<b>Total</b>	<b>6/25</b>	<b>Total</b>	<b>13/25</b>	<b>Total</b>	<b>12/25</b>	<b>Total</b>	<b>25/25</b>

**FISCAL IMPACT**

TOC Policy items with associated funding commitments would apply to the use of the Affordable Housing Fund; no funding is being requested with this item. No fiscal impact is associated with working to implement current recommendations beyond staff time.

By pursuing compliance with TOC Policy, Burlingame will remain eligible to apply for OBAG-4 funds.

Exhibits:

- Draft TOC Policy Administrative Guidance (May 2025)
- Draft TOC Policy Evaluation Criteria Framework