

February 5, 2020

The Peninsula Corridor Joint Powers Board  
12509 San Carlos Avenue  
San Carlos, CA 94070

**Re: Agenda Items 4g (Adoption of Rail Corridor Use Policy) and 9 (Adoption of Transit-Oriented Development Policy)**

Dear Chair Pine and Peninsula Corridor Joint Powers Board,

SPUR is excited to see Caltrain develop a rail corridor use policy and a transit-oriented development policy. The rail corridor use policy will help Caltrain preserve the corridor, which is needed for future long-term service growth, and the transit-oriented development policy will help ensure that the service growth supports sustainable and affordable communities with access to high-quality transit.

Rail Corridor Use Policy

SPUR supports the rail corridor use policy and Caltrain's intention to maintain ownership of the land yet allow for interim uses. Public land is a valuable asset and public agencies should hold onto it. If land around the right of way and around stations becomes permanently encumbered, it can negatively impact the rail service and capacity and undermine Caltrain's investments.

Transit-Oriented Development Policy

1. Housing affordability goals and targets

SPUR supports increasing the supply of housing for all income levels. Caltrain should establish an ambitious and achievable target for affordable housing on its properties and in its station areas.

- We recommend setting a goal for a **total number** of housing units and affordable units on Caltrain-owned property. Thirty-percent of 100 is much less than thirty-percent of 1,000. This approach is also consistent with BART's TOD policy.
- We recommend establishing a **goal** of achieving at least 30% affordable housing **across the Caltrain system**, and a **goal** of at least 20% affordable housing **on-site**. On a site-by-site basis, it may not be possible to achieve a 30% target without financial resources needed to attain that goal or without a subsidized ground lease.

Additionally, some locations will be able to support higher levels of affordable housing than others. If the requirement is set too high, and the development is deemed infeasible, then neither market-rate nor affordable housing will be created.

2. Density

SPUR supports the goal of maximizing density of development and recommends setting minimum standards for density on its parcels.

3. Long-term ground leases

SPUR supports the use of long-term ground leases rather than the sale of publicly owned land. This gives Caltrain the greatest flexibility over time, along with a long-term revenue source rather than a one-time infusion.

Thank you for the opportunity to provide input on these important resolutions, as they are critical steps towards creating a rail service that is accessible to all and ensuring that our investments in more service are leveraged to support sustainable and complete communities.

Sincerely,

A handwritten signature in black ink, appearing to be 'Laura Tolhoff', with a long horizontal line extending to the right.

Laura Tolhoff  
Regional Planning Policy Director