



October 14, 2014

Helen Tann
Office of Research, Demonstration, and Innovation
Federal Transit Administration
U.S. Department of Transportation
1200 New Jersey Avenue SE
Washington, DC 20590

Docket No. FTA-2014-0017 – Notice of Proposed Circular: Research, Technical Assistance, and Training Programs

Dear Ms. Tann:

Enterprise Community Partners (Enterprise), the Natural Resources Defense Council (NRDC), and the National Housing Conference (NHC) appreciate the opportunity to comment on the Federal Transit Administration's (FTA) [Proposed Circular on Research, Technical Assistance, and Training Programs](#).¹ We commend FTA for its continued recognition of the importance of coordinating transportation and housing policies. Such coordination helps create a more efficient and equitable transportation network and stronger communities. We applaud the significant progress made by FTA in recent years, including the incorporation of the [Livability Principles](#) into DOT policies and your continued participation in the interagency [Partnership for Sustainable Communities](#). Most notably, we commend FTA for its revisions

¹ Enterprise is a national nonprofit organization whose mission is to create opportunity for low- and moderate-income people through affordable housing in diverse, thriving communities. We work to achieve this by introducing solutions through cross-sector public-private partnerships with financial institutions, governments, community organizations and other partners that share our vision. Our Transit-Oriented Development (TOD) Initiative has provided capital and technical assistance to facilitate affordable housing and community development projects near transit throughout the country. Please see the [appendix](#) for more details on our TOD Initiative and empirical evidence in support of closer coordination between housing and transportation systems.

The NRDC's purpose is to safeguard the Earth: its people, its plants and animals and the natural systems on which all life depends. At NRDC, we develop and advocate sustainable solutions to the environmental challenges facing our communities. We place special emphasis on innovative approaches to improve older neighborhoods, inform plans for residential and commercial development, contain harmful suburban sprawl, and demonstrate sustainable practices for key urban components such as food systems, green infrastructure to prevent water pollution, and transportation. We work for the innovations of today to become the standard practices of tomorrow.

Formed in 1931, the nonprofit NHC is dedicated to helping ensure safe, decent and affordable housing for all in America. As a division of NHC, the Center for Housing Policy specializes in solutions through research, working to broaden understanding of America's affordable housing challenges and examine the impact of policies and programs developed to address these needs. Through evidence-based advocacy for the continuum of housing, NHC develops ideas, resources and policy solutions to shape an improved housing landscape.



to the Capital Investment Grant Program rating criteria, particularly the adoption of new provisions that encourage project sponsors to engage the affordable housing industry.

This holistic approach is vital to the health and vibrancy of communities and regions across the country. That being said, these policies represent a shift from previous norms where too often planning and investment decisions related to housing, transportation, infrastructure, and disaster resiliency were approached through separate and distinct processes. Indeed, a significant number of planning procedures and funding sources remain segmented and/or could be enhanced by greater integration. While some FTA grantees have experience engaging with the housing sector (both affordable and market rate) through local and metropolitan planning processes, joint development projects, or other activities, others have not engaged in such collaborations. Challenges remain as both transportation and housing entities work to learn about the complex procedures, policies, and regulations of their counterparts in the respective sectors. Achieving a more holistic and integrating metropolitan planning and investment process will take significant effort. We believe that further integration can yield more efficient and equitable investments. Therefore any delays in this paradigm shift could bear costs which would be particularly troublesome in this era of diminished resources.

To accelerate this learning curve, we urge FTA to allocate a portion of its resources for research, technical assistance and training to support grantees' efforts to integrate transportation, housing, infrastructure, and disaster resiliency policies. This should provide support for both overall efforts to meet this goal, and to specific joint development policies and Capital Investment Grant projects. Based on our reading of the proposed circular, we believe that these efforts are particularly appropriate under the following programs (emphasis added):

- ***"Section 5314(b) authorizes the Secretary to make Grants and enter into Contracts, Cooperative Agreements, and Other Agreements to provide public transportation-related technical assistance to assist providers of public transportation to:*** Comply with the Americans with Disabilities Act (ADA); comply with human services transportation coordination requirements and enhance the coordination of related Federal resources; meet the transportation needs of elderly individuals; ***assist market-based development around transit stations; address transportation equity for low-income and minority individuals; and any other technical assistance activity that the Secretary determines is necessary to advance the interests of public transportation."***
- In addition, ***Section 5322(d) directs the Secretary to establish a national transit institute and award grants*** to a public 4-year degree-granting institution of higher education ***to develop and conduct training and educational programs*** for Federal, State, and local transportation employees, United States citizens, and foreign nationals engaged or to be engaged in Government-aid public transportation work.

We believe that aligning resources in this manner is the logical next step in FTA's progress toward a better transportation planning and investment structure and is consistent with the commendable, proactive efforts to improve inclusivity and effectiveness of the transportation planning process.



Once again, thank you for the opportunity to provide public comment. We stand ready and willing to collaborate as you continue to work on these issues. Please contact Enterprise's Michael A. Spotts, Senior Analyst – Project Manager (mspotts@enterprisecommunity.org) with any questions.

Sincerely,

Diane Yentel
Vice-President, Public Policy and Government Affairs
Enterprise Community Partners

A handwritten signature in blue ink that reads "Melinda Pollack".

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Chris Estes
President and CEO
National Housing Conference



APPENDIX – The Importance of Equitable TOD and Details on Enterprise’s TOD Initiative

Why is it important to coordinate transportation and affordable housing investments?

Land use and density can have a significant impact on the performance of the transportation network. Recent analyses have shown that it is possible for rapidly growing communities to halt rising traffic levels by combining dense development with a range of transportation options, including transit, walking and bicycling.² Therefore, density of residential development and its proximity to transportation assets are important considerations during the transportation planning process.

There is also significant value in looking beyond the number and location of housing units and giving closer consideration to the income profile of residents and the affordability of units. This is a particularly important aspect of an equitable and effective transportation system, from a system efficiency, environmental protection and social equity perspective.

System Efficiency

Two oft-cited goals of the public transportation system are to increase resident mobility and to reduce congestion. To achieve these goals, it is imperative to orient the system in a way that links more frequent riders to useful destinations. Lower-income households are more likely to utilize public transportation, and transit-oriented development that reaches these potential riders can increase ridership, stabilize revenues, and reduce automobile congestion:

- A 2007 analysis indicated that nearly 66 percent of transit users had household incomes below \$50,000 (in 2004 dollars).³
- According to 2009 National Household Travel Survey data, the less a household earns, the more likely it is to utilize public transportation (with the exception of households earning more than \$100,000).⁴
- A California-based study showed that households earning less than 80 percent of area median income (AMI) rode transit more and made fewer vehicle trips per day than those above that

² Merchant, Canaan. "As Arlington Booms, Traffic Drops." Greater Greater Washington, June 30, 2014. <http://greatergreaterwashington.org/post/23318/as-arlington-booms-traffic-drops/>.

Reed, Dan. "Montgomery County Added 100,000 Residents Since 2002, but Driving Didn't Increase." Greater Greater Washington, April 23, 2014. <http://greatergreaterwashington.org/post/22578/montgomery-county-added-100000-residents-since-2002-but-driving-didnt-increase/>.

³ Neff, John, and Larry Pham. 2007, May. A Profile of Public Transportation Passenger Demographics and Travel Characteristics Reported in On-Board Surveys. Washington, DC: American Public Transportation Association.

⁴ Mattison, Jeremy. Travel Behavior and Mobility of Transportation-Disadvantaged Populations: Evidence from the National Household Travel Survey. Fargo, ND: Small Urban & Rural Transit Center; Upper Great Plains Transportation Institute; North Dakota State University, February 13, 2013. <http://www.ugpti.org/pubs/pdf/DP258.pdf>; Page 21



threshold. Extremely low-income households (those earning up to 30 percent of AMI) took 50 percent more trips than households earning 120 percent of area median income or more.⁵

- The same study found that the combination of the development pattern and the income mix of a neighborhood can have a significant impact on traffic. Transit-oriented areas had lower car ownership and fewer daily vehicle trips overall. Lower-income households living within one-half mile of transit drove 25-30 percent fewer miles than similar households in non-transit-oriented locations. Those within one-quarter mile drove even less. Higher income households within one-quarter mile of transit drove twice as many miles and owned twice as many cars as extremely low-income households within similar proximity.⁶

Environmental Protection

Federal transportation policy also has the goal of mitigating negative environmental impacts, most notably in the form of the Congestion Mitigation and Air Quality Improvement program. In 2012, the transportation sector accounted for 28 percent of total U.S. greenhouse gas emissions, according to the Environmental Protection Agency.⁷ Sprawling development patterns not only lead to longer commutes (and higher emissions), but they also result in the loss of farmland and open space.⁸

As the aforementioned travel data shows, mixed-income transit-oriented development facilitates the use of alternative modes of transportation and reduces the amount of land necessary to accommodate a growing population and economy. Therefore, it can serve as an effective tool for achieving the environmental goals of DOT and its grantees.

Social Equity

Transit-oriented development can expand mobility options, enhance access to employment opportunities, childcare, schools, stores and critical services, and lower commuting expenses.⁹ In addition to the aforementioned data showing the correlation between income and transit utilization, the 2009 National Household Travel Survey found that:

- Those with a medical condition were also more likely to use public transportation;

⁵ TransForm, and California Housing Partnership Corporation. Why Creating and Preserving Affordable Homes Near Transit Is a Highly Effective Climate Protection Strategy. California, 2014.

<http://www.chpc.net/dnld/AffordableTODResearch051514.pdf>; Page 10.

⁶ TransForm, and California Housing Partnership Corporation; Pages 3, 8-9.

⁷ US EPA, Climate Change Division. "Greenhouse Gas Emissions: Transportation Sector Emissions." Overviews & Factsheets. Accessed August 25, 2014.

<http://www.epa.gov/climatechange/ghgemissions/sources/transportation.html>.

⁸ Benfield, Kade. Paving Paradise: Sprawl and the Environment. Natural Resources Defense Council, April 14, 2000. <http://www.nrdc.org/cities/smартgrowth/rpave.asp>.

⁹ An analysis by the Illinois Housing Development Agency found that, among neighborhoods where they financed a development, households in neighborhoods served by both bus and rail saved an average of \$3,000 in annual transportation costs compared to neighborhoods without transit access.

Center for Neighborhood Technology. Safe, Decent, and Affordable: Transportation Costs of Affordable Housing in the Chicago Region. Chicago: Center for Neighborhood Technology, January 2012. <http://www.cnt.org/repository/SDA.pdf>.



- Public transportation's mode share is largest among those 85 and over; and
- There was a statistically significant decline in the usage of automobiles among that age cohort from 2001-2009.¹⁰

The aging of the population means that if commuting trends continue, demand for more transit-oriented and walkable development will increase. Ensuring that a portion of this development remains affordable to lower income and other vulnerable household allows the benefits of TOD to reach those that can benefit most.

Meeting the Demand for Equitable TOD

High overall demand for transit-oriented neighborhoods makes it difficult to ensure that a portion of the housing stock remains affordable. Elevated land costs create pressure for developers to target higher-income households. Affordable housing developers may struggle to compete for sites against developers that can charge higher rents. Furthermore, property value increases in transit-served areas put existing residents at risk of increased cost burden and displacement.¹¹ Therefore preserving and creating affordable housing opportunities near transit requires targeted plans, policies and tools, as well as the proactive involvement of both the housing and transportation sectors.

The Enterprise TOD Initiative: Working to Create Equitable, Transit-Served Communities

Enterprise strives to reduce housing insecurity through affordable housing that links low-income families to schools, jobs, transit and healthcare. The Enterprise TOD Initiative works with regional collaborations, policymakers and nonprofit housing organizations to advance development of mixed-income, amenity-rich neighborhoods near public transit. Enterprise creates innovative financing tools and solutions for transit-oriented development and serves as an influential voice for policy and best practices across the country. In collaboration with our partners, Enterprise is actively engaged in TOD capital, solutions and policy efforts in Atlanta, the Bay Area, Chicago, Cleveland, Denver, Los Angeles, Seattle and Washington, D.C.

Priorities

¹⁰ Mattison, Jeremy. Travel Behavior and Mobility of Transportation-Disadvantaged Populations: Evidence from the National Household Travel Survey. Fargo, ND: Small Urban & Rural Transit Center; Upper Great Plains Transportation Institute; North Dakota State University, February 13, 2013.

<http://www.ugpti.org/pubs/pdf/DP258.pdf>; Pages 21-23.

¹¹ Immergluck, Dan. 2009. "Large Redevelopment Initiatives, Housing Values and Gentrification: The Case of the Atlanta Beltline." *Urban Studies* 46: 1723-1745;

McMillen, Daniel P., and John McDonald. 2004. "Reaction of House Prices to a New Rapid Transit Line: Chicago's Midway Line, 1983-1999." *Real Estate Economics* 32(3): 463-486;

Pollack, Stephanie, Barry Bluestone and Chase Billingham. 2010, October. "Maintaining Diversity in America's Transit-Rich Neighborhoods: Tools for Equitable Neighborhood Change." Dukakis Center for Urban and Regional Policy.



- Creating new capital resources for acquiring multifamily properties, under-utilized parcels and vacant land near existing and planned public transit stops for affordable housing and community development
- Advancing favorable policies that ensure planning for and investment in affordable housing and community assets near transit and coordination among public agencies
- Conducting research that informs best practices in partnership with TOD experts such as The Natural Resources Defense Council, The Center for Transit Oriented Development, Local Initiatives Support Corporation, Low Income Investment Fund and the National Housing Conference
- Supporting grantees of the U.S. Department of Housing and Urban Development's Sustainable Communities program as they work to develop financial solutions for TOD in their communities

Accomplishments

- The \$15 million Denver TOD Fund, managed by Enterprise, seeks to create or preserve 1,000 affordable homes along current and future transit corridors in Denver. Since April 2010, the Fund has made eight acquisition loans, which will create and preserve approximately 600 affordable homes, a new public library, and over 100,000 square feet of supportive commercial space, all accessible by transit.
- Enterprise is a partner in the \$50 million Bay Area Transit Oriented Affordable Housing (TOAH) Fund, which has already funded over \$10 million in acquisition loans that will result in over 200 affordable homes for seniors, families and people with chronic illnesses. These transit-friendly developments will include important retail and health care services, including a full-service grocery store in a former food desert.
- In Washington, D.C., the Green Preservation of Affordable Transit-Oriented Housing (GreenPATH) initiative, launched by Enterprise and the National Housing Trust, works to preserve affordable housing within a half-mile of current and planned rail stations.
- Enterprise, along with 19 other non-profit, foundation, and bank organizations, founded Denver's Mile High Connects, a broad partnership of organizations with a collective mission to ensure that metro Denver's regional transit system fosters communities that offer all residents the opportunity for a high quality of life. Mile High Connects focuses on leveraging public transportation to increase access to affordable housing choices, good jobs, quality schools and healthy lifestyles.

TOD Initiative Contacts

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