

March 11, 2013

Peter M. Rogoff  
Administrator, Federal Transit Administration  
U.S. Department of Transportation  
1200 New Jersey Ave SE  
Washington, DC 20590

**RE: Docket Number FTA–2010–0009, New Starts and Small Starts Program**

**Comments on Proposed Guidance for the New Starts and Small Starts Program**

Dear Administrator Rogoff,

On behalf of the undersigned groups, we are pleased to submit these comments on the Federal Transit Administration’s (FTA’s) proposed guidance for the New Starts / Small Starts Program. Some organizations may submit additional comments as well, but join this sign-on letter to affirm our shared support for core principles that help ensure equitable access to transit by households of all incomes, races, ethnicities, and abilities.

These comments address four core issues:

1. Ensuring that low- and moderate-income families can afford to live near proposed transit stations
2. Ensuring that low- and moderate-income families have good transit access to jobs
3. Removing barriers to “enrichments” that maximize the economic, social and environmental benefits of proposed transit projects
4. Providing incentives for project sponsors to improve access and mobility for transit-dependent populations

**1. Ensuring that low- and moderate-income families can afford to live near proposed transit stations**

We strongly commend FTA for the decision in the final rule to create incentives for project sponsors to consider the location of affordable housing when planning new transit corridors and for local communities to preserve existing affordable housing near proposed transit stations and develop policies that ensure that a share of new development near planned stations is affordable. If executed effectively, these policies will promote equitable access to transit for households of all incomes, races, ethnicities, and abilities,<sup>1</sup> while also boosting ridership by increasing the number of low-income households living near planned stations.

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<sup>1</sup> Policies to promote transit access among residents of subsidized housing also help promote transit access by low-income households that include people with disabilities. According to the U.S. Department of Housing and Urban Development, “Renter households that include people with disabilities are two times more likely to receive

In the final guidance, we urge FTA to be as strong and specific as possible about the implementation of these requirements to ensure they are applied in a way that leads to meaningful and measurable outcomes that expand equitable access to transit for households of all incomes, races, ethnicities, and abilities. In particular, we urge FTA to focus on the following:

- **Creating incentives for communities to ensure that a share of new residential development in station areas is affordable.** Tying the affordability goals to new residential development by the private sector ensures that affordable housing efforts are focused on areas that have a significant chance of gentrifying and provide amenities and opportunities that will benefit low- and moderate-income households.
- **Including exceptions to any expectation that new affordable housing be developed for station areas located in areas with high concentrations of poverty and an abundance of affordable housing.** Such an exception will help ensure that we do not exacerbate the concentration of poverty by increasing the number of affordable housing units in areas that already have high concentrations of poverty and affordable housing.
- **Include a more consistent focus on preserving existing affordable housing in planned station areas in the final guidance.** Given the prospects for gentrification around many station areas, it is important for local communities to adopt policies and take concrete steps to preserve existing affordable housing over the long-term.
- **Provide an explicit focus on long-term affordability.** Given the long-term investment in public transit infrastructure, it is important that affordable housing investments similarly be structured to ensure that affordable housing units are available over the long-term to continue to provide equitable access to transit for households of all incomes over an extended time-frame.
- **Provide an explicit focus on meeting the housing needs of very low- and extremely low-income households.** Households with these incomes are more likely than higher-income households to have severe housing cost burdens and to need government assistance in accessing affordable housing. For this reason, it is essential that local housing strategies for station areas specifically address their needs.

## 2. Ensuring that low- and moderate-income families have good transit access to jobs.

Ensuring access to jobs via transit for workers of all skill levels is just as important as ensuring that families of all income levels have the ability to live near transit. If low-income workers are able to live near transit but cannot take transit to employment, the benefits of living near transit will be significantly diminished. Unfortunately, many job centers are not well-served by transit. Recent research from the Brookings Institution has revealed that in the nation's most populous metropolitan areas, the typical worker can reach only about seven percent of the region's jobs in a one-way, 45-minute transit commute. Additionally, there is a mismatch between where low-income people live and where low-skill jobs can be found. Brookings found that three-quarters of low- and middle-skill jobs cannot be accessed

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housing assistance than those that do not include people with disabilities." *2009 Worst Case Housing Needs of People with Disabilities: Supplemental Findings of the Worst Case Housing Needs 2009: Report to Congress.* Washington, DC: HUD, 2011.

even by a one-way, 90-minute transit commute.<sup>2</sup>

In addition to achieving greater regional equity and productivity, research has shown that transit projects that do a good job linking workers to employment centers will generate higher ridership than those that do not, even if the number of residents living near the projects are the same.<sup>3</sup> Therefore, we believe that FTA should include job access in its ridership model, and should evaluate job connectivity as part of its review of economic development benefits. Specifically, FTA should review policies indicative of local commitment to job concentration and growth near the proposed project, and project sponsors should provide specific information about how the proposed project would link housing and jobs.

### **3. Removing barriers to “enrichments” that maximize the economic, social and environmental benefits of proposed transit projects**

We support FTA's proposal to categorize certain project elements as "enrichments" that do not count against the project's cost effectiveness calculation in order to reduce disincentives to the inclusion of elements that maximize the economic, social and environmental impacts of planned stations. These project elements can include, but are not limited to: improving station energy efficiency, providing bike and pedestrian access to transit stations, and joint development projects such as affordable housing, day care centers and community facilities. Though not fully captured by the standard rating criteria, these project elements will benefit New Starts/Small Starts projects from various perspectives, including economic development, project effectiveness, environmental quality and social equity.

FTA's concept of enrichments will reduce barriers to incorporating these elements. We urge FTA to implement this provision robustly and provide explicit recognition that enrichments may include the development of affordable housing and structured parking.

### **4. Providing incentives for project sponsors to improve access and mobility for transit-dependent populations.**

While the benefits of transit system expansion are far reaching, they can be particularly impactful for individuals and households without any other means of transportation. Providing access for transit-dependent populations stabilizes ridership and revenues for the transit system and increases opportunity for those households by connecting them to jobs, retail centers and social services.

Therefore, we agree that FTA should give extra weight to transit-dependent populations in its calculation of mobility benefits.

If you would like to discuss these recommendations further, please contact Jeffery Lubell, Executive Director of the National Housing Conference's research affiliate, the Center for Housing Policy at [jlubell@nhc.org](mailto:jlubell@nhc.org) (202.466.2121 EXT 234).

We deeply appreciate your consideration of our recommendations.

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<sup>2</sup> Berube, Alan; Kneebone, Elizabeth; Puentes, Robert, and Tomer, Adie. 2011. *Missed Opportunity: Transit and Jobs in Metropolitan America*. The Brookings Institution.

<sup>3</sup> Wood, Jeffrey; Zimmerman, Mariia; and Poticha, Shelley. 2009. *Destinations Matter: Building Transit Success*. Center for Transit-Oriented Development.

**Sincerely,**

**The undersigned organizations:**

Alliance for Biking & Walking

America Walks

Association of Pedestrian and Bicycle Professionals

Association of Programs for Rural Independent Living

Center for Neighborhood Technology

Enterprise Community Partners

FRESC

Good News Mountaineer Garage

Habitat for Humanity International

Independent Living Center of the Hudson Valley Inc.

Local Initiatives Support Corporation

Low Income Investment Fund

National Alliance of Community Economic Development Associations

National Association of County and City Health Officials

National Council on Independent Living

National Housing Conference

National Housing Trust

Partnership for Working Families

Poverty & Race Research Action Council

Reconnecting America

Sierra Club

Urban Land Conservancy