

# CREATING AND PRESERVING AFFORDABLE HOUSING THROUGH THE FEDERAL TRANSIT CAPITAL INVESTMENT PROGRAM

An analysis of the FY2016 Federal Funding  
Recommendations



Policy Brief prepared by Mariia Zimmerman and Kyle Lukacs

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## Introduction

Each year, the US Department of Transportation (USDOT) issues its annual report detailing the Federal Transit Administration’s (FTA) recommendations for projects seeking federal funding through the Capital Investment Program authorized by Congress. The report is a critical marker signaling those projects which meet federal evaluation criteria and are proposed to receive millions of dollars in federal investment. Competition for these scarce transit dollars is fierce. A low rating can trigger questions in the local sponsor community about a project’s validity, while a high rating can engender stronger local support often needed to get a project across the funding finish line.

For years, advocates of affordable housing argued that given the strong demand for this funding and the connection playing out in communities where new transit projects helped catalyze market interest that pushed up the cost of housing, the federal government should place

### Capital Investment Grant Program Projects in Project Development and Engineering - FY 2016



Figure 1. Projects Seeking Federal Transit Funding in the FY2016 Report to Congress (Source: USDOT)

stronger conditions on recommending those projects which contained policies to preserve and build housing affordable near transit. In its August 2013 Final Policy Guidance, FTA took a bold step in formalizing this linkage.<sup>1</sup> The Final Guidance incorporates affordable housing measures into both the statutorily-required land use and economic development criteria through a focus on the amount of legally binding affordable units existing today, and what policies and programs are in place to ensure affordable housing needs are met into the future.<sup>2</sup>

<sup>1</sup> Federal Transit Administration, (August 2013). “New and Small Starts Evaluation and Rating Process, Final Policy Guidance.” [http://www.fta.dot.gov/documents/NS-SS\\_Final\\_PolicyGuidance\\_August\\_2013.pdf](http://www.fta.dot.gov/documents/NS-SS_Final_PolicyGuidance_August_2013.pdf)

<sup>2</sup> A terrific overview of the affordable housing provisions in the Policy Guidance was developed by Spotts, Michael (2013). “New Starts: Leveraging the New Transit Policy Guidance to Create Inclusive Communities of Opportunity.” Enterprise Community Partners. <http://www.enterprisecommunity.com/resources/ResourceDetails?ID=0085215>

This past February, the USDOT recommended funding for 16 Small Starts and New Starts projects as part of its Fiscal Year 2016 (FY16) Budget proposal.<sup>3</sup> Among other things, these projects were rated on their overall project strength, local financial commitment, mobility and environmental benefits, and a number of other key factors including land use and economic development. As part of the project evaluation process, project sponsors were asked to document the affordable housing supply and needs, highlight affordable housing plans and policies specifically targeted to station areas, show available financial mechanisms and evidence of their use, identify examples of affordable housing in new or existing developments, and explain how long-term affordable housing will be ensured.

This Policy Brief examines how the factors and subsequent ratings of affordable housing metrics appeared to affect the overall, land use, and economic development ratings for projects. Our analysis is based purely on the information available in the FY2016 report, and is limited by not having access to the more detailed information submitted by project sponsors describing in greater detail the policies or programs they have enacted. We do not focus on the full set of statutorily required measures. Information on how projects rated across a range of factors can be accessed through the actual FY2016 report available on the FTA website: <http://www.fta.dot.gov/grants/12868.html>

## Summary of Project Ratings

The following summary describes how projects fared under the different factors related to affordable housing within the FTA Capital Investment Program framework. Both Small Start and New Start projects were evaluated against these measures.<sup>4</sup> While the affordable housing elements appear to have impacted the rating for the two statutory criteria under which they were included: Land Use and Economic Development, these factors do not appear to have had a substantial impact on the Overall Rating of a project for federal funding. Two critical factors, unrelated to the affordable housing issues, appear to play a larger role in overall project recommendation. These include the strength of the local financial commitment, and the federal share of total project cost with no project requesting more than 50% of total capital costs receiving more than a medium project rating. Appendix A provides a more detailed discussion of each of the individual projects and how FTA rated across the following factors.

Figure 2, on the following page, summarizes project ratings across the key factors related to affordable housing and also indicates project type. Projects ranged from low to high across the range of factors. The LBA Ratio refers to Legally Binding Affordability for renters with incomes below 60% area median income and evaluated against a formula established by FTA within the Land Use criteria. It is based upon the proportion of existing “legally binding affordability restricted” housing within ½ mile of station areas

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<sup>3</sup> Federal Transit Administration, “Annual Report on Funding Recommendations, Fiscal Year 2016 Capital Investment Program, Report of the Secretary of Transportation to the United States Congress Pursuant to 49 U.S.C. 5309(o)(1).” <http://www.fta.dot.gov/grants/12868.html>

<sup>4</sup> New Starts projects are those seeking \$75 million or more in Capital Investment Program funding or have an anticipated total project cost of \$250 million or more. Small Starts projects are those seeking less than \$75 million and have an anticipated total project cost of less than \$250 million.

to the proportion of “legally binding affordability restricted” housing in the counties through which the project travels.<sup>5</sup>

Project Title	Project Type	Overall Project	Economic Development	Land Use	LBA Ratio	Affordable Housing Tools
Van Ness Avenue BRT (San Francisco, CA)	SSPD	High	High	High	--	--
Southwest LRT (Minneapolis, MN)	NSPD	Medium-High	Medium-High	Medium	Medium-Low (1.30)	High
East-West Connector BRT (The Amp) (Nashville, TN)	SSPD (X)	Medium-High	Medium-High	Medium	High (3.71)	Medium-High
Wave Streetcar (Fort Lauderdale, FL)	SSPD (X)	Medium-High	Medium-High	Medium	High (4.64)	Medium-High
National Capital Purple Line (Maryland)	NSE	Medium-High	Medium-High	Medium	medium (1.51)	Medium-High
Red Line (Baltimore, MD)	NSPD	Medium-High	Medium-High	Medium-High	medium (1.85)	Medium-High
Charlotte, CityLYNX Gold Line Phase 2 (Charlotte, NC)	SSPD	Medium-High	Medium	Medium	High (3.79)	Medium
Tacoma Link Light Rail Extension (Tacoma, WA)	SSPD	Medium-High	Medium	Medium	High (4.67)	Medium
Westside Subway Extension - Section 2 (Los Angeles, CA)	NSE	Medium-High	Medium-High	Medium-High	Low (0.89)	Medium
TEX Rail (Forth Worth, TX)	NSPD	Medium-High	Medium	Medium-Low	Low (0)	Medium-Low
Southeast Extension (Denver, CO)	NSPD	Medium-High	Medium-High	Medium-Low	Low (0)	Medium-Low
4th St/Prater Way Corridor (Reno, NV)	SSPD	Medium-High	Medium-Low	Medium	Medium-High (2.34)	Low
Mid-Coast Corridor Transit Project (San Diego, CA)	NSPD	Medium-High	Medium-High	Medium	Low (0)	Medium
Vancouver, C-TRAN Fourth Plain Bus Rapid Transit (Vancouver, WA)	SSPD (X)	Medium-High	Medium-High	Medium	High (4.33)	Medium-High
Provo-Orem Bus Rapid Transit (Provo-Orem, UT)	SSPD	Medium-High	Medium-Low	Medium	--	--
Montana Corridor BRT (El Paso, TX)	SSPD	Medium	Medium	Low	Low (1.07)	Medium-Low
COTA Cleveland Avenue BRT Project (Columbus, OH)	SSPD	Medium	Medium	Medium	Medium (1.75)	Medium-Low
SMART San Rafael to Larkspur Regional Connection (San Rafael, CA)	SSPD	Medium	Low	Medium-Low	Low (0.83)	Low
Fresno Area Express Blackstone/Kings Canyon BRT (Fresno, CA)	SSPD	Medium	Medium	Medium	--	--

Figure 2. Project Ratings Overview (Note: Project Types with (X) indicate a project that was not recommended for funding. SSPD = small start project development, NSPD = New Start Project Development, NSE = New Start Engineering)

<sup>5</sup> FTA defines a legally binding affordability restriction as a “lien, deed of trust or other legal instrument attached to a property and/or housing structure that restricts the cost of housing units to be affordable to households at specified income levels for a defined period of time and requires that households at these income levels occupy these units.” (August 2013 New Starts and Small Starts Final Policy Guidance.)

### **Tools to Maintain or Increase Share of Affordable Housing (Affordable Housing Tools)**

The Southwest LRT in Hennepin County, MN is the only project recommended for funding to receive a high rating for Affordable Housing Tools. The Red Line and Purple Line projects in Maryland both received ratings of Medium-High while four projects were rated Medium, four were rated Medium-Low, two were rated Low, and three projects were not rated in this category.

Three projects (Vancouver C-TRAN, The Amp in Nashville and the Wave Streetcar in Fort Lauderdale) were not recommended for funding yet were rated Medium-High for Affordable Housing Tools. These three projects also rated Medium-High for Economic Development, Medium for Land Use, and Medium-High Overall.

### **Affordable Housing Tools & Overall Project**

Of the recommended projects which ranked Medium or above for Affordable Housing Tools, their Overall Project Rating was Medium-High. Projects with a medium-low or low rating for affordable housing tools all had an Overall Project Rating of Medium or Medium-Low. No project was advanced which rated lower than a Medium overall.

### **Affordable Housing Tools & Land Use**

Over 70 percent of the projects that rated at least a Medium for Affordable Housing Tools received a Medium rating on Land Use while the remaining third rated Medium-High. Half of the projects rated Medium-Low for Affordable Housing Tools also rated low for Land Use. The Van Ness Avenue BRT was the only project to receive a high for land use, but it was not rated for affordable housing factors. The overall average rating for Land Use was a Medium with only one project receiving a low (Montana Corridor BRT in El Paso, TX).

### **Affordable Housing Tools & Economic Development**

Affordable housing policies and financing programs was a factor considered within the Economic Development criterion. Almost half (46 percent) of the rated projects received a Medium-High rating for Economic Development. All of the projects to receive a Medium-High or High rating for Affordable Housing Tools received a Medium-High for Economic Development. The results for those who scored a Medium-Low for Affordable Housing Tools were less clear in the effect they had on the rating for this factor. Yet those projects ranked Low to Medium-Low for Economic Development all had similar ratings for Affordable Housing.

### **Affordable Housing Tools & LBA Ratio**

The proportion of legally binding affordability restricted housing in the project corridor compared to the proportion in the counties through which the project travels gives us the legally binding affordability (LBA) restricted housing ratios. The two projects which scored High on the LBA Ratio received only a Medium for Affordable Housing Tools. The only project rated Medium-High on the LBA Ratio was actually rated Low for Affordable Housing Tools. The Minneapolis Southwest LRT project received the top rating for Affordable Housing Tools but a Medium-Low for LBA Ratio. The highest score for a Low rated LBA Ratio project was Medium.

Why this apparent disconnect? Actually, if you look at the intention behind FTA’s development of the LBA and the profile discussions of ratings it becomes clear that FTA wanted to see those corridors where there is currently a high percentage of affordable housing put in place policies to preserve or increase long-term affordability. As noted in the August 2013 Guidance document, “One measure of the readiness of a community to accept a new transit investment and avoid significant gentrification that can occur over time is the presence of “legally binding affordability restricted” units. These units have protections in place to ensure that they will continue to be available to low and moderate income households as changes in the corridor occur.”<sup>6</sup>

## Further Analysis

### LBA Ratio

One of the metrics that determines the Land Use Rating for projects is the proportion of legally binding affordability (LBA) restricted units within the station area divided by the proportion of LBA restricted units within the county or counties that the proposed corridor travels through. The station area is measured as a ½ mile radius around the station. The projects are then rated using the following scale:

<b>LBA Ratio Rating Scale</b>	
High	Ratio > 2.50
Medium-High	Ratio between 2.25 and 2.49
Medium	Ratio between 1.50 and 2.24
Medium-Low	Ratio between 1.10 and 1.49
Low	Ratio less than 1.10

The Tacoma Washington Link Light Rail Extension and the Charlotte CityLYNX Gold Line Phase 2 received the highest LBA Ratio Ratings with 3.79 and 4.67 respectively. Despite these high LBA Ratio Ratings, the projects were rated Medium for Affordable Housing Tools as a result of the large demand for affordable housing units. For example, Tacoma, Washington needs 14,100 more housing units in order for low-income residents to pay affordable rent.

The highest rated projects for Affordable Housing Tools received only Medium to Medium-Low ratings for the LBA Ratio. This suggests that the future potential for affordable housing factors greatly into the overall rating. The SMART San Rafael to Larkspur Regional Connection received Low ratings for Affordable Housing Tools and the LBA Ratio which seemed to affect the Land Use Rating of Medium-Low and the Overall Project Rating of Medium.

### Affordable Housing Tools

Proving a commitment to affordable housing through policies, plans, and incentives corresponds to a higher rating for Affordable Housing Tools. The Southwest LRT in Minneapolis, MN for example received the highest rating for Affordable Housing Tools as a result of the extensive partnerships, successful developments, and the inclusion of affordable housing in local planning processes. Both the Red Line

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<sup>6</sup> Federal Transit Administration, (August 2013). “New and Small Starts Evaluation and Rating Process, Final Policy Guidance.” [http://www.fta.dot.gov/documents/NS-SS\\_Final\\_PolicyGuidance\\_August\\_2013.pdf](http://www.fta.dot.gov/documents/NS-SS_Final_PolicyGuidance_August_2013.pdf)



and Purple Line in Maryland rated Medium-High as a result of state and local policies which ensure the development of affordable housing. These two projects may have been rated higher had specific examples of developments been included.

Even when projects have been identified, the affect is limited unless the projects are within the transit corridor. For example, the Southeast Extension in Denver, Colorado identified five affordable housing developments and programs which support affordable housing, but no projects were listed in the transit corridor. The lack of Transit-Oriented Development policies and affordable housing programs beyond Federal Programs also contribute to lower ratings as seen for the Cleveland Avenue Bus Rapid Transit and the Montana Corridor BRT. Project ratings are also affected by characteristics of the transit corridor, for example, the 4th Street/Prater Way Corridor in Reno, NV has a Medium-High LBA Ratio of 2.34, but 42% of all renters spend more than 30% of their income on housing, making this one of the lowest rated projects according to the Affordable Housing Tools Rating.

Furthermore, a balance between LBA Ratio, evidence of previous affordable housing success, and affordable housing policies, plans, and incentives helps to ensure projects score well. While project examples were not specifically mentioned in the two Maryland projects, the Medium LBA Ratio and strong proof of policies helped to ensure a Medium-High Overall Project Rating. On the contrary, when projects such as the San Diego Mid-Coast Corridor Transit Project have policies which can help develop affordable housing, but no affordable housing is present in the corridor, the overall score is lowered. This project and the Westside Subway Extension in Los Angeles were rated Medium in Land Use and Affordable Housing Tools for this reason.

### **Projects Not Recommended for Funding**

Three projects which rated High for the LBA Ratio, Medium-High for Affordable Housing Tools, Medium for Land Use, Medium-High for Economic Development, and Medium-High Overall were not recommended for funding. It is surprising that these projects were not advanced as they scored highly on most measures and included affordable housing policies such as requiring 15% of new housing units to be affordable, density bonuses, development fee rebates, expedited processing, an affordable housing trust fund, permitting accessory dwelling units, transit overlay districts, rental vouchers, tax credits, and the presence of existing affordable housing units.

### **Conclusion**

This preliminary analysis of ratings from the FY2016 Report to Congress provides a few interesting takeaways. First, it is heartening to see USDOT recognize the important linkage between transportation and housing with this historic inclusion of affordable housing policies, programs and need in its evaluation of transit projects seeking funding. Transit corridor planning typically is driven by transit agency and engineering staff who are focused on critical project cost and delivery issues. In contrast, affordable housing programs and policies involve very different players – typically those at the local or state levels who administer these programs. Recognizing that successful transit and community development requires cross-sector planning, FTA has taken an important step to create an incentive for

this type of coordination through the specific emphasis on affordable housing within the New Starts/Small Starts context.

Secondly, it appears that FTA places a high value on the establishment of policies and programs to help neighborhoods along new transit lines respond to gentrification pressures. The LBA rating is a proxy for affordable housing need as an indicator of the number of legally binding affordability. Communities with a high LBA were not guaranteed a high land use rating, but rather were penalized if they did not have strong policies in place for affordable housing preservation. Conversely, the Southwest LRT project in Minnesota was the one project with a High Rating for Affordable Housing Tools but a Medium-Low LBA rating yet received an overall Medium-High Overall Project Rating. Project sponsors are encouraged to work with all the housing partners in their community (from the state to local level, including private sector, public and non-profit) to identify the range of policies and programs that are in place along a transit corridor. Project sponsors need to make their case, and include specific information including examples of recently constructed projects or those that are in the pipeline. FTA also places particular emphasis on land bank and acquisition programs. Some regions such as Denver, San Francisco and the Twin Cities are exploring ways to partner and use public dollars creatively to support these types of funds.

Third, more information is needed to better understand how FTA made its rating determinations. As communities are working to try and proactively address gentrification there is much that can be learned by greater discussion of successful policies to preserve and expand affordable housing. At the same time as FTA is working to ensure that high-quality, low-cost transportation options represented by bus rapid transit, light rail, commuter rail, subway extensions and streetcar projects serve low-income residents, there is also a larger debate about the need to ensure that affordable housing opportunities exist in suburban communities. In these contexts, it is often a challenge to provide adequate fair housing units. Even in those communities that may not currently have a great demonstrated need as evaluated through the LBA, it is also important that they consider opportunities to put affordable housing tools in place. Looking forward, there is a need for FTA to coordinate with the US Department of Housing and Urban Development to research and develop best practices on how urban and suburban communities are facing these challenges. In particular, the Capital Investment Program provides a highly visible and influential tool for understanding the role that FTA's new evaluation framework is having to create incentives for affordable housing policy discussions and cross-sector actions. Working with HUD and philanthropic partners, it provides the opportunity to better understand the context within which affordable housing issues are impacted by new transit investments -- both to combat gentrification and to affirmatively further fair housing. These are complex matters that benefit from greater information and cross-sector discussion at all policy levels.



## Appendix A: Individual Projects

### High Affordable Housing Tools Score

#### Southwest LRT (Minneapolis, MN) – New Starts Project Development

Overall Project	Economic Development	Project Justification	Land Use	LBA Ratio	Affordable Housing Tools
Medium-High	Medium-High	Medium	Medium	Medium-Low (1.30)	High
Local Financial Commitment	Capital Cost	Financing Costs	Total Capital Cost	Total CIG Funding Request	CIG Share of Capital Costs
High	\$1,588.4 M	\$65 M	\$1,653.4 M	\$826.7 M	50.00%

The highest rated project for Affordable Housing Tools by FTA, the Southwest LRT was lauded for proving a commitment to affordable housing. Affordable housing has historically been located near transit stations and this continues with the proposed project corridor. FTA also mentions that the, “supportive policies, plans, programs and partnerships are extensive, and are integrated throughout local planning processes and many levels of government and with partners.” Despite a low LBA Ratio, the project corridor has potential as the population density is was rated high with 250,000 per square mile.

#### Red Line (Baltimore, MD) – New Starts Project Development

Overall Project	Economic Development	Project Justification	Land Use	LBA Ratio	Affordable Housing Tools
Medium-High	Medium-High	Medium-High	Medium-High	Medium (1.85)	Medium-high
Local Financial Commitment	Capital Cost	Financing Costs	Total Capital Cost	Total CIG Funding Request	CIG Share of Capital Costs
Medium-High	\$2,888.9 M	\$108.8 M	\$2,997.7 M	\$900 M	30.00%

In addition to financial assistance from the State of Maryland, the City of Baltimore has also undertaken efforts to increase the share of affordable housing, including: inclusionary zoning ordinances with affordable housing requirements, funding and financing for development and down payments, and redevelopment of vacant and decrepit housing. The project was also rated Medium-High for employment and population density.

#### National Capital Purple Line (Maryland) – New Starts Engineering

Overall Project	Economic Development	Project Justification	Land Use	LBA Ratio	Affordable Housing Tools
Medium-High	Medium-High	Medium-High	Medium	Medium (1.51)	Medium-High
Local Financial Commitment	Capital Cost	Financing Costs	Total Capital Cost	Total CIG Funding Request	CIG Share of Capital Costs
Medium-High	\$2,325.1 M	\$123.1 M	\$2,448.2 M	\$900. M	36.80%

The National Capital Purple Line rated well for Affordable Housing Tools due to Montgomery County laws and policies which ensure a proportion of new housing is affordable along with loan programs and financial incentives to increase homeownership for low-moderate income households. The State of Maryland also provides resources for affordable rents and mortgages. Despite identifying needs for additional affordable housing, few tools or policies have been adopted.

## Average Affordable Housing Tools Score

### Tacoma Link Light Rail Extension (Tacoma, WA) – Small Starts Project Development

Overall Project	Economic Development	Project Justification	Land Use	LBA Ratio	Affordable Housing Tools
Medium-High	Medium	Medium	Medium	High (4.67)	Medium
Local Financial Commitment	Capital Cost	Financing Costs	Total Capital Cost	Total CIG Funding Request	CIG Share of Capital Costs
High	\$166 M	---	\$166 M	\$75 M	45.20%

Tacoma has many tools available to encourage affordable housing such as height bonuses, tax exemptions, loans for repair, rehabilitation, homebuyer assistance, and affordable housing development, affordability covenants, and rent controls. Accessory dwelling units have also been considered to increase density. Despite this, 14,100 housing units are needed to meet the current demand for affordable housing in a medium density corridor.

### CityLYNX Gold Line Phase 2 (Charlotte, NC) - Small Starts Project Development

Overall Project	Economic Development	Project Justification	Land Use	LBA Ratio	Affordable Housing Tools
Medium-High	Medium	Medium	Medium	High (3.79)	Medium
Local Financial Commitment	Capital Cost	Financing Costs	Total Capital Cost	Total CIG Funding Request	CIG Share of Capital Costs
High	\$150 M	---	\$150 M	\$75 M	50.00%

The City of Charlotte has determined that an additional 700 – 1,200 affordable housing units will be constructed by 2035 in an area that was already rated High for LBA Ratio. Charlotte also has the Assisted Multi-Family Housing at Transit Station Policy which encourages development of assisted housing within multi-family developments near transit stations. TOD policies are also in place for the corridor with an expected growth of 50% by 2035 corresponding with 20,000 additional people and 60,000 Jobs. This project rated medium-low for population density and medium for transit supportive policies.

### Westside Subway Extension – Section 2 (Los Angeles, CA) – New Starts Engineering

Overall Project	Economic Development	Project Justification	Land Use	LBA Ratio	Affordable Housing Tools
Medium-High	Medium-High	Medium-High	Medium-High	Low (0.89)	Medium
Local Financial Commitment	Capital Cost	Financing Costs	Total Capital Cost	Total CIG Funding Request	CIG Share of Capital Costs
Medium	\$2,273.2 M	\$101.2 M	\$2,374.4 M	\$1,187 M	50.00%

Despite a history of preserving and creating affordable housing in Los Angeles and throughout the State of California, there are no existing or proposed projects in the Los Angeles Section 2 Station area and only one project in the Beverly Hills portion of the Area. The Overall Project Rating benefited from Medium-High population density and Transit Supportive Policies while ranking High for Employment Density.

### Mid-Coast Corridor Transit Project (San Diego, CA) – New Starts Project Development

Overall Project	Economic Development	Project Justification	Land Use	LBA Ratio	Affordable Housing Tools
Medium-High	Medium-High	Medium-High	Medium	Low (0)	Medium
Local Financial Commitment	Capital Cost	Financing Costs	Total Capital Cost	Total CIG Funding Request	CIG Share of Capital Costs
Medium-High	\$1,687.7 M	\$424.4 M	\$2,112.1 M	\$1,043.4 M	49.40%

The City of San Diego has encouraged affordable housing through financing and developing programs, inclusionary zoning requirements and linkage fees to fund affordable housing and incentivize private development, and code changes including density bonuses, parking reductions, and streamlined permitting. Despite these tools, there is no affordable housing in the corridor.

### Low Affordable Housing Tools Score

### TEX Rail (Forth Worth, TX) – New Starts Project Development

Overall Project	Economic Development	Project Justification	Land Use	LBA Ratio	Affordable Housing Tools
Medium-High	Medium	Medium	Medium-Low	Low (0)	Medium-Low
Local Financial Commitment	Capital Cost	Financing Costs	Total Capital Cost	Total CIG Funding Request	CIG Share of Capital Costs
Medium-High	\$881 M	\$10.9 M	\$891.9 M	\$445.9 M	50.00%

Despite a lack of affordable housing, the 2013 City of Fort Worth Comprehensive plan includes targets for affordable rental housing. The goal of having 10% of housing developed include options for people whose income is less than 60% of the area-wide median income is included in the draft Fort Worth Strategic Action Plan for 2023. The Land Use Rating was also affected by the low population density.

### Southeast Extension (Denver, CO) – New Starts Project Development

Overall Project	Economic Development	Project Justification	Land Use	LBA Ratio	Affordable Housing Tools
Medium-High	Medium-High	Medium-High	Medium-Low	Low (0)	Medium-Low
Local Financial Commitment	Capital Cost	Financing Costs	Total Capital Cost	Total CIG Funding Request	CIG Share of Capital Costs
Medium-High	\$224.3 M	---	\$224.3 M	\$92 M	41.00%

Five affordable projects have been developed since 2004 but none were specifically identified in the new project station areas. State programs offer financing and a Denver program funding affordable housing preservation near transit stations has been expanded region-wide. Low population density also contributed to the Medium-Low Land Use Rating.

### Cleveland Avenue Bus Rapid Transit (Columbus, OH) - Small Starts Project Development

Overall Project	Economic Development	Project Justification	Land Use	LBA Ratio	Affordable Housing Tools
Medium	Medium	Medium	Medium	Medium (1.75)	Medium-Low
Local Financial Commitment	Capital Cost	Financing Costs	Total Capital Cost	Total CIG Funding Request	CIG Share of Capital Costs
Medium	\$47.7 M	---	\$47.7 M	\$38.1 M	80.00%

Federal and local programs such as the HOME Investment Partnerships Program have helped to construct four affordable housing projects in the transit corridor including 640 units. A lack of TOD

zoning ordinances and financial incentives to promote affordable housing reflect the Medium-Low Affordable Housing Tools score.

### Montana Corridor BRT (El Paso, TX) - Small Starts Project Development

Overall Project	Economic Development	Project Justification	Land Use	LBA Ratio	Affordable Housing Tools
Medium	Medium	Medium	Low	Low (1.07)	Medium-Low
Local Financial Commitment	Capital Cost	Financing Costs	Total Capital Cost	Total CIG Funding Request	CIG Share of Capital Costs
Medium	\$35.8 M	---	\$35.8 M	\$20.4 M	56.90%

The Montana BRT Corridor has 515 existing affordable housing units but has done very little to encourage more development besides federal programs like the HOME Investment Partnerships Program and Community Development Block Grants. Financial assistance is available through the City sponsored Housing Finance Corporation. The Montana BRT Corridor does have a higher percentage of the population below the poverty level (22%), lower average median household income (<\$38,100), and higher percentage of persons using public transit for work trips (2.2%) compared to State of Texas. Low population and employment densities also contribute to a low Land Use Rating.

### 4th Street/Prater Way Corridor (Reno, NV) - Small Starts Project Development

Overall Project	Economic Development	Project Justification	Land Use	LBA Ratio	Affordable Housing Tools
Medium-High	Medium-Low	Medium	Medium	Medium-High (2.34)	Low
Local Financial Commitment	Capital Cost	Financing Costs	Total Capital Cost	Total CIG Funding Request	CIG Share of Capital Costs
High	\$52.6 M	---	\$52.6 M	\$6.5 M	12.30%

Despite a high proportion of legally binding affordability restricted housing in the corridor, housing costs represent more than 30% of income for 30,000 renters and 39,000 owners. This equates to 42% of all renters. Assistance is available through Washoe County HOME Consortium and the Reno Housing Authority. Density bonuses are available for affordable housing developments. The local financial commitment and cost effectiveness of this project helped raise the Overall Project Rating to Medium-High.

### San Rafael to Larkspur Regional Connection (San Rafael, CA) - Small Starts Project Development

Overall Project	Economic Development	Project Justification	Land Use	LBA Ratio	Affordable Housing Tools
Medium	Low	Medium	Medium-Low	Low (0.83)	Low
Local Financial Commitment	Capital Cost	Financing Costs	Total Capital Cost	Total CIG Funding Request	CIG Share of Capital Costs
Medium	\$42.5 M	---	\$42.5 M	\$22.5 M	53.00%

Despite policies and language supporting housing by Marin County and Larkspur, no affordable housing development projects were identified. However, this project ranks highly on financial factors as all funds are budgeted with Metropolitan Transportation Commission funding.