



Leveraging the New Starts Program to Build Communities of Opportunity:

*PolicyLink Comments in Response to the Federal Transit Administration's
Advance Notice of Proposed Rulemaking (ANPRM) on the New Starts and Small Starts Programs
(FTA Docket # FTA-2010-0009)*

PolicyLink is pleased to offer the following comments on the New Starts and Small Starts program to the U.S. Department of Transportation's (USDOT) Federal Transit Administration (FTA). As a leader in the movement to build more equitable transportation policy, PolicyLink¹ is deeply invested in the success of the New Starts and Small Starts programs. As the largest federal source of funding for building our nation's public transportation systems, the New Starts and Small Starts programs play a significant role in shaping communities around the nation. If leveraged well, these programs can foster more equitable, sustainable, and opportunity-rich communities throughout the country.

The transportation projects that are funded by the New Starts and Small Starts Programs should build healthy, sustainable communities of opportunity—places with quality schools, access to good jobs with family-supporting wages, affordable housing choices, public transportation, safe and walkable streets, parks, healthy environments, access to healthy food, and strong social networks. First, this means increasing transportation access and mobility for communities where public transportation is unaffordable, unreliable, or nonexistent, most often in low-income neighborhoods and communities of color. This also means leveraging the New Starts and Small Starts Programs to: reduce housing, transportation, and energy costs for working families; improve health outcomes (particularly disproportionate health impacts on disadvantaged communities); and link low-income workers and minority-owned firms to economic opportunities in the transportation industry.

There are several trends that point to the need for a different course of investment in our nation's transportation system:

- ***Inadequate Transportation Access, Lack of Mobility, and High Costs Stifle Access to Opportunity.*** Low-income people and communities of color are less likely to own personal vehicles², and those who own vehicles spend almost twice as much of their household budgets on transportation, compared to middle-income households.³ Furthermore, despite current record levels of transit ridership, as a result of budget shortfalls, in the past year, nearly 90 percent of transit agencies⁴ across the country have cut service and/or raised fares, posing significant mobility challenges and cost burdens for low-income households that depend upon public transportation.
- ***Fewer Economic Opportunities Associated with Building Our Nation's Transportation System.*** Transportation is a large economic sector—one in 10 civilian jobs is transportation-related.⁵ However, women and communities of color are not significant beneficiaries of the jobs, workforce development, and contracting opportunities associated with the construction of transit facilities, roads, and bridges. Of the roughly eight million people employed in the transportation construction industry in 2008, only six percent were African American and 2.5

percent were women, a much smaller proportion than their representation in the overall economy.⁶

- ***Local and Regional Governments Struggle to Provide Adequate Transportation Options and Affordable Housing Near Public Transportation.*** Dramatic increases in the demand for housing located close to public transportation has led to increased rents and housing costs, displacement of lower-income residents, and dwindling affordable housing options. A study of affordable housing in eight U.S. cities found that of the more than 100,000 federally-assisted housing units located in within a half-mile of public transportation, 63 percent have contracts that will expire before the end of 2012.⁷
- ***Past Transportation Practices Have Created Disproportionate Health Impacts on Disadvantaged Communities.*** Our current transportation system impacts our health in many ways, including: pollution-related respiratory disease, personal injury risk, and obesity. In economically distressed neighborhoods, disconnected roadway networks, poorly designed and deteriorated streets, inadequate lighting, limited sidewalks, and minimal traffic enforcement place residents at higher risk of injury and serve as barriers to walking and active living. Furthermore, poor air quality from heavy auto traffic flow and emissions from transportation facilities, such as bus depots and ports, increase the rates of asthma for residents living in close proximity to these facilities.

Strategic investments in public transportation have the potential to reverse these trends. Moreover, a new approach to evaluating transportation projects that compete for New Starts and Small Starts resources has the potential to help to build a nation where all can participate and prosper, and make progress toward addressing the racial and economic disparities in income, wealth, health, and opportunity.

To leverage the New Starts and Small Starts programs to build communities of opportunity and maximize the ability of the programs to attain equity goals, we recommend that the FTA use the following guiding principles⁸ as it considers a new approach to evaluating transportation projects that compete for federal resources from these two programs:

1. Expand and upgrade public transportation options in America, particularly in communities where quality transportation options are unaffordable, unreliable, or nonexistent.
2. Increase mobility and improve transit service for older adults, disabled, low-income, and residents of rural communities.
3. Invest in transit oriented development that provides access to long-term affordable housing (rental and homeownership) and prevents residential displacement.
4. Fund public transportation projects that ensure all communities have streets, sidewalks, and active transportation networks that are safe and welcoming to everyone who uses them.
5. Promote integration of transportation, housing, environment, and community revitalization strategies to increase walking, biking, and other low-carbon transportation modes, and address our nation's most urgent environmental and climate challenges.

6. Make investments in public transportation projects that foster healthy people and healthy communities.
7. Foster economic revitalization in high-need and vulnerable communities through targeted investment in public transportation infrastructure.
8. Prioritize transportation projects that include a plan to increase access to quality jobs, workforce development, and contracting opportunities for women, people of color, and low-income individuals.
9. Engage the public, especially historically disadvantaged communities, in planning and implementing improvements to and expansion of the local and regional public transportation network; and hold decision-makers accountable for realizing equitable outcomes.

Comments in Response to Specific Questions from the ANPRM on the New Starts and Small Starts Programs

PolicyLink offers the following responses to several of the questions posed included, in the June 3, 2010 ANPRM. Several of those questions speak specifically to the benefits of public transportation for low-income communities and communities of color. The responses include local examples, key data, and a description of the ways that the New Starts and Small Starts programs can promote communities of opportunity.

Category 1: Cost Effectiveness

- *What, if any, additional benefits such as environmental benefits, equity considerations (e.g., the social benefits of low-income ridership), and benefits of economic development attributed to a specific project could FTA include in the measure of cost effectiveness? What specific benefits should be included in the calculation of cost effectiveness?*
- *If you believe that FTA should include other benefits in the measure of cost effectiveness, how can FTA best quantify those benefits? Please include specifics on how FTA would quantify and measure these benefits.*

PolicyLink applauds the January 2010 decision by Secretary of Transportation Ray LaHood to broaden the scope of FTA's evaluation of the benefits of public transportation projects beyond the calculation of time saved traveling from one end of a transportation system to another and the directive to explore a fuller range of benefits of robust, affordable, and reliable public transportation. We hope this change will help communities look differently at transportation projects – from the standpoint of users, particularly, those for whom public transportation is the primary way to travel for their daily needs. More often than not, these are low-income people and people of color. Sixty percent of public transit riders are people of color⁹, and in communities like Los Angeles, that figure is closer to 85 percent¹⁰. Twenty eight percent of public transportation users have annual incomes of \$15,000 or less and 83 percent have incomes under \$50,000.¹¹

One of the key challenges of the current public transportation system is that of affordability, which is an important consideration related to cost effectiveness, particularly for low-income families. Households earning \$20,000 to \$35,000 annually and located far from job centers spend 70 percent of their incomes on housing and transportation combined.¹² Low-income people and working families stand to benefit

from federal investments in public transportation. One way for the FTA to quantify the benefits of providing transportation to disadvantaged populations is evaluate projects based on their impact on the combined cost of housing and transportation of low- and moderate-income families located near the proposed public transportation project. The Center for Neighborhood Technology has developed an excellent methodology for measuring these costs.¹³

In accounting for the potential benefits of reduced household costs, FTA should require communities seeking New Starts and Small Starts funds to demonstrate how their existing transit oriented development policies will foster communities that are equitable and affordable to a range of incomes, including the poor. Loss of affordable housing units near transit and the displacement of families that often results is a threat to the success of the overall transportation infrastructure¹⁴, and public transit systems in particular, for several reasons:

1. When displacement occurs, lower-income residents are typically pushed out toward locations where transportation options are scarce and they must travel long distances on a daily basis in older, less fuel-efficient vehicles, undermining efforts to decrease transportation-related greenhouse gas emissions.
2. As households are displaced, the new households that occupy units are often smaller in size than the previous households, reducing the overall number of potential transit riders along a given corridor.
3. In communities of color and low-income communities where displacement occurs, when residents are replaced by non-Hispanic white families or higher-income households, the transit ridership levels are likely to decrease, as these populations tend to use public transit less and drive more.

However, there is a robust collection of policies and strategies that communities can use to preserve and expand affordable housing near public transportation, and avoid displacing households. These include: employer assisted housing; inclusionary zoning; affordable housing preservation plans; land banking; community land trusts; affordability covenants; and low-income housing tax credits.

FTA should require New Starts and Small Starts applicants to estimate the reductions in household costs expected as a result of the combination of the investment in public transportation and policies that preserve and expand affordable housing. An excellent illustration of this approach is from the San Francisco Bay Area, where the Great Communities Collaborative, a nonprofit/community foundation partnership, has been working since 2006 to engage residents in over 24 communities—particularly low-income people and communities of color—in local transit oriented development planning processes and ensure that by 2030 all Bay Area residents live in communities with affordable homes and nearby access to quality transit. In early 2010, the Collaborative garnered initial funding from the regional transportation agency to launch a \$40 million fund that will support property acquisition for 1,100 to 3,800 new affordable homes located near rail or bus stops.

Also, as previously mentioned, one of the most challenging issues for communities is finding ways of supporting improvements and expansion of the public transportation system. Because of the great competition for New Starts and Small Starts funding, typical federal share of funds allocated to a project is 50 percent of the total project budget, well below the investment provided for highway projects and most often below what is needed to see the public transportation project to completion. To finance the

“local” share of transportation project costs, many communities consider new taxes or user fees (e.g., increased gas tax, carbon tax, vehicle miles traveled tax) as well as congestion pricing, tolling, and public-private partnerships. Regardless of the funding sources that are ultimately utilized, it is essential that low-income people and communities of color are not disproportionately burdened. In evaluating a project’s cost effectiveness, the FTA should consider the social equity benefits that will be realized in states and regions that dedicate a portion of revenues from new user fees toward expanding mobility options and lessening transportation cost burdens on low-income people and communities of color. Additionally, FTA should consider judging projects on how they can increase affordability and provide efficient transportation for children to get to and from school¹⁵ as well as result in public health cost savings.¹⁶

Category 2: Environmental Benefits

- *In measuring environmental benefits, should FTA consider a broad definition of environment, as does the National Environmental Policy Act, which includes consideration of both the human and natural environment? Or, should FTA focus on the environmental performance in specific areas such as air quality emissions, energy use, greenhouse gas emissions, or water quality? Should FTA look at project-specific environmental benefits such as change in energy use and/or pollutant emissions? Should FTA consider other characteristics such as assessing the degree to which a proposed New Starts project fits into a state or regional sustainability plan?*
- *In measuring the environmental benefits of a project, how might FTA take into account the goals and objectives of Executive Order 13514 (Federal Leadership in Environmental, Energy and Economic Performance)? Should a project be evaluated and rated on how well it maximizes the land use efficiencies created through locating the project in areas that facilitate sustainable development?*

With regard to environmental benefits and transportation, the Obama Administration has established as one of its principles for the Interagency Partnership for Sustainable Communities:

“Provide more transportation choices. Develop safe, reliable, and economical transportation choices to decrease household transportation costs, reduce our nation’s dependence on foreign oil, improve air quality, reduce greenhouse gas emissions, and promote public health.”

This livability principle, along with the National Environmental Policy Act ought to guide FTA toward considering the broadest definition of environment, to include the human and natural environment with particular attention to:

- **Creating Healthy Transportation Systems:** Public health research shows that transportation, along with race, income, educational attainment, job access, and job quality are the key determinants of individual and community health. As such, it is essential that all federally-funded transportation projects, including those funded through the New Starts and Small Starts programs, contribute positively to the health and well-being of the community where the project will be located. In order to determine the impact of the project, an evaluation tool – such as the Healthy Development Measurement Tool¹⁷ or a health impact assessment – should be used in developing the transportation project. There are several examples of such assessments that have been completed, at a variety of scales and levels of detail.¹⁸ FTA should consider using such assessments as a framework for examining the environmental benefits of

transportation projects, as they also help to reduce health disparities across race and income and achieve more equitable outcomes.

- **Achieving Environmental Justice:** Given the directive of Executive Order 12898 (Federal Actions to Address Environmental Justice in Minority Populations and Low Income Populations), FTA should evaluate projects seeking New Starts and Small Starts funding based on the transportation improvements that are created for communities that have historically lacked access to the benefits of our transportation system, and have most often shouldered the burdens of that system.
- **Addressing Climate Change:** In the State of California, as a result of the SB 375 legislation, communities and regions will be preparing plans that help them set specific targets for reducing greenhouse gas emissions from cars and trucks. These plans will result in local and regional development strategies that increase biking, walking, and public transportation use. Such plans also have great potential to reduce dependency on the single-occupant vehicle, thereby lowering carbon and greenhouse gas emissions. The New Starts and Small Starts programs should reward communities that develop plans to expand and improve local and regional public transportation, revitalize existing communities, and invest in transit oriented development that preserves access to affordable housing.

It should be noted that these areas of concern were identified by a previous expert panel that examined environmental benefits of transit projects. The panel recommended that FTA consider these issue areas in evaluating projects that seek funding from the New Starts and Small Starts programs.¹⁹

In addition, it is essential that the definition of transportation choices should reflect the need for safe walking and biking environments. Improvements to the walking and biking environment can increase transit ridership anywhere from 10-50 percent above what would occur without the improvements.²⁰ From 1990 to 2009, the number of trips taken on foot more than doubled from 18 billion to 42.5 billion and the number of bike trips increased from 1.7 billion to 4 billion.²¹ Secretary LaHood's March 2010 announcement of "the end of favoring motorized transportation at the expense of non-motorized" holds great promise, particularly for communities of color, where African Americans walk for 50 percent more trips than non-Hispanic whites, and Hispanics walk for nearly 40 percent more trips than non-Hispanic whites.²² However, bicycle and pedestrian safety challenges for people of color are significant as both African American and Hispanic pedestrians and cyclists have a higher death rate due to crashes than non-Hispanic white pedestrians and cyclists.²³

Given these trends, projects that compete for New Starts and Small Starts funds should be evaluated according to how they improve the walking and biking environment and, moreover, their ability to reduce injuries and fatalities for the most vulnerable populations, who also happen to have the highest walking and biking rates.

Category 3: Economic Development Effects

- *Should FTA continue to use its current approach for evaluating the economic development effects of major transit investments?*
- *Should FTA define economic development differently? If so, how?*
- *What scale should be used to measure economic development? At a corridor level or at the metropolitan area level?*

- *Can a New Starts or Small Starts project generate new economic development that would otherwise not have occurred in the surrounding area? If so, how might that economic development be measured? Should FTA consider the overall economic health of a metropolitan area when estimating the potential for a New Starts or Small Starts project to foster economic development?*
- *How should FTA assess whether the plans, policies, and incentives intended to promote economic development would lead to transit oriented development that provides jobs and services within the corridor? Should FTA consider the economic development effects of the project on adjacent corridors?*
- *Should FTA consider changes in land values as evidence of potential economic growth in a station area or project corridor? Should FTA consider the extent to which existing affordable housing and commercial space can be maintained in the corridor after implementation of a transit project there?*

Currently, the FTA defines economic development as “the extent to which a New Starts or Small Starts project is likely to enhance additional transit-supportive development”. PolicyLink believes that economic development and community revitalization that is catalyzed by an investment in transportation should: result in more equitable outcomes for all communities; reduce economic disparities; and guarantee access to racially and economically integrated communities. With that in mind, in evaluating the economic development benefits of a transportation project that is applying for New Starts for Small Starts funding, FTA should more broadly define economic development benefits to address the following:

- **Access to Jobs in the Transportation Sector:** Historically, women and people of color have lacked access to employment in the transportation industry. The challenges for minority contractors are significant. Of the \$48 billion in Recovery Act funds that the USDOT awarded to states for highway construction in 2009, only 2 percent went to people of color owned or disadvantaged businesses, well below the USDOT goal of 10 percent.²⁴ In addition, FTA should seek to leverage provisions from the Department of Housing and Urban Development’s Section 3 requirements²⁵ and the recommendations²⁶ from the Office of Management and Budget regarding the use of infrastructure investment from the America Recovery and Reinvestment Act to hire local residents.
- **Bringing Amenities to High-Need Areas:** In many communities of color and low-income communities, systematic patterns of disinvestment, suburbanization, “white flight”, and gentrification within a region have created communities that lack access to a grocery store, pharmacy, recreation facility, workforce development center, child care facility, or health clinic within walking distance. For rural areas this challenge is even more significant. For these “high-need” communities, economic development that comes from transportation investment is a lifeline. It is essential that New Starts and Small Starts project applicants seek to maximize the benefits to high-need areas and do not aggregate vulnerable communities in with wealthier, more amenity-rich, communities or regions, which may mask the localized economic challenges of the disinvested community.
- **Land Values and Affordable Housing:** Including changes in land values in the economic development criteria can be a double-edged sword, as acknowledged by an expert panel that advised the FTA on economic development²⁷. There is growing demand around the nation for

housing located near public transit—a recent study found that properties located within a five-to ten-minute walk of a transit station sell for 20 to 25 percent more than comparable properties located farther away.²⁸ Given the contribution of increasing land values toward the declining availability of affordable housing near public transit, and the threat that the displacement that follows can present to the transportation system, FTA should cease to use land values as a proxy for economic development until the point the land value measure can be developed that places the measure that appropriately value the preservation and expansion of affordable housing. In developing such a revised framework for considering land values, FTA should look at emerging research that maps and assesses the “risk” of gentrification of communities, particularly those with affordable housing near transit.²⁹

- **Overall Job Creation:** Given the current economic climate, creation of long-term jobs with family-supporting wages is of paramount importance. Jobs often cluster near transportation hubs. Job clustering, often measured in terms of jobs/acre, can be tracked using the US Census’ Longitudinal Employer-Household Dynamics dataset for local and regional centers alike. Local job centers that are transit oriented tend to be more multi-modal with bicycle and pedestrian facilities proximate to a light rail station, bus rapid transit hub, or a place where two high-frequency heavy ridership bus lines come together, whereas regional job centers are often defined by highway interchanges or a standalone heavy rail without the same amenities. In addition to the number of jobs created, the FTA should evaluate the economic development benefits created by projects which seek to achieve a match between the jobs that are created through transit oriented development and the skills levels of the local workforce. There is emerging research³⁰ and methods of analysis to quantify this and FTA should include the resulting metrics in their evaluation of economic development benefits.

Category 4: Additional Recommendation

Transportation projects yield more equitable results and have greater community support when area residents, neighborhood groups, and small business owners are involved in their creation. Community members possess invaluable knowledge of neighborhood needs and assets and have important ideas to contribute. The most inclusive processes engage residents from the beginning, before major decisions are made, and throughout the planning and development process.

FTA should evaluate potential New and Small Starts projects based on their ability to incorporate robust, meaningful, and lasting public engagement into their transportation projects and that they result in equitable outcomes for all communities.

Notes

¹ PolicyLink is a national research and action institute advancing economic and social equity by Lifting Up What Works[®]. For more information on these comments, please contact Anita Hairston, Senior Associate for Transportation Policy, at 202-906-8034 or anita@policylink.org.

² Alan Pisarski, NCHRP Report 550-TCRP Report 510: *Commuting in America III: The Third National Report on Commuting Patterns and Trends* (Washington, DC: Transportation Research Board of the National Academies, 2007).

³ The Bureau of Transportation Statistics, Consumer Expenditure Survey, Transportation Statistics Annual Report, 2000, www.bts.gov. Retrieved from http://www.publictransportation.org/reports/asp/mobility_rural.asp.

⁴ Transportation For America, *Stranded at the Station: The Impact of the Financial Crisis in Public Transportation* (Washington, DC: Transportation For America, 2009). Retrieved from http://www.t4america.org/docs/081809_stranded_at_thestation.PDF

⁵ Transportation Research Board, *The Workforce Challenge: Recruiting, Training and Retaining Qualified Workers for Transportation and Transit Agencies* (Washington, DC: Transportation Research Board, 2003).

⁶ U.S. Bureau of Labor Statistics, *Household Data Annual Averages, Table 11: Employed Persons by Detailed Occupation, Sex, Race, and Hispanic Origin*, 2008.

⁷ Reconnecting America and National Housing Trust, *Preserving Opportunities: Saving Affordable Homes Near Transit* (Oakland, CA: Reconnecting America, 2008). Cities included in the study were: Boston, Chicago, Cleveland, Denver, New York City, Portland, St. Louis, and Seattle.

⁸ These principles reflect the successes of a host of local, state, and national advocacy campaigns calling for a new vision for our nation's transportation system where all people have greater access, mobility, and opportunity. They also build upon the equity goals in the six "Livability Principles" articulated by the Obama Administration's Partnership for Sustainable Communities.

⁹ A Profile of Public Transportation Passenger Demographics and Travel Characteristics Reported in On-Board Surveys. American Public Transportation Association. 2007. Retrieved from: http://www.apta.com/resources/statistics/Documents/transit_passenger_characteristics_text_5_29_2007.pdf

¹⁰ Geoff Ray. *LA Bus Riders' Union Rolls Over Transit Racism*. Race, Poverty & the Environment. Winter 2005/2006.

¹¹ A Profile of Public Transportation Passenger Demographics and Travel Characteristics Reported in On-Board Surveys. American Public Transportation Association. 2007. Retrieved from: http://www.apta.com/resources/statistics/Documents/transit_passenger_characteristics_text_5_29_2007.pdf

¹² Barbara Lipman, *A Heavy Load: The Combined Housing and Transportation Burdens of Working Families* (Chicago, IL: Center for Housing Policy, 2006).

¹³ The Center for Neighborhood Technology's Housing and Transportation Affordability Index Tool includes transportation and housing cost data for more than 300 metropolitan regions across the U.S. The tool can be accessed online at: <http://htaindex.cnt.org/>.

¹⁴ Recent research from Enterprise and FRESC: Good Jobs, Strong Communities revealed that 15 of the 25 largest transit agencies in the U.S. report that affordable housing plays a key role in supporting their primary transit mission. For more information, see: *Making Affordable Housing at Transit a Reality: Best Practices in Transit Agency Joint Development*, by Robin Kniech and Melinda Pollack, retrieved on July 30, 2010 from: <http://fresc.org/downloads/TransitDev.pdf>.

¹⁵ High student absentee rates have been correlated with lack of access to public transportation in Denver, CO, according to Todd Litman, *Evaluating Public Transit Benefits and Costs; Best practices Guidebook*. Victoria Transport Policy Institute. February 2010

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- ¹⁶ Methodologies for quantifying public health savings exist as documented in to Todd Litman, “Evaluating Public Transit Benefits and Costs; Best Practices Guidebook.” Victoria Transport Policy Institute. February 2010
- ¹⁷ The Healthy Development Measurement Tool evaluates the health needs, costs (including those associated with problems such as vehicle injuries, obesity, asthma, etc.), and benefits of urban development plans and projects. The HDMT has been used to evaluate community-based transportation projects in communities in the San Francisco Bay Area. More information on this tool can be found at: <http://www.thehdmtool.org/>.
- ¹⁸ The process of conducting a health impact assessment on transportation projects, including: the Beltline Project in Atlanta, GA; the Community Transportation Plan in Decatur, GA; and the MacArthur BART Transit Village in Oakland, CA, is described in a 2008 American Journal of Preventive Medicine article, titled “Use of Health Impact Assessment in the U.S. 27 Case Studies, 1999–2007”, retrieved on July 27, 2010 from: http://www.cdc.gov/healthyplaces/publications/AJPM_HIACasestudies_March2008.pdf
- ¹⁹ *Comparing the Environmental Benefits of Transit Projects: Proceedings from a Colloquium*, October 2008, prepared by the Research and Innovative Technology Administration, US Department Transportation.
- ²⁰ Todd Litman, *Evaluating Public Transit Benefits and Costs; Best Practices Guidebook*. Victoria Transport Policy Institute. February 2010
- ²¹ The National Bicycling and Walking Study: 15-Year Status Report. Federal Transit Administration. Retrieved from: http://drusilla.hsrrc.unc.edu/cms/downloads/15-year_report.pdf. Accessed 07/19/2010.
- ²² Michelle Ernst and Lilly Shoup, *Dangerous by Design: Solving the Epidemic of Preventable Pedestrian Deaths (And Making Great Neighborhoods)*. (Washington, DC: Transportation for America, 2009). Retrieved from http://t4america.org/docs/dangerousbydesign/dangerous_by_design.pdf
- ²³ Knoblauch, Richard L. and Rita Furst Seifert. *The Pedestrian and Bicyclist Highway Safety Problem as it Relates to the Hispanic Population in the United States*. Federal Highway Administration’s (FHWA) Pedestrian and Bicycle Safety Research Program, 2004.
- ²⁴ Jason Reece, Christy Rogers, Matthew Martin and Stephen Menendian. *ARRA and the Economic Crisis: One Year Later* (Ohio State University: Kirwan Institute, 2010).
- ²⁵ Section 3 of the Housing and Urban Development Act of 1968 was developed to ensure that employment and other economic opportunities resulting from federal investment in housing and community development programs should, where possible, be directed toward low- and very-low income persons.
- ²⁶ Office of Management and Budget Memorandum #09-15, dated April 3, 2009, encourages federal agencies to support projects funded by the American Recovery and Reinvestment Act that ensure that “the people who live in the local community get the job opportunities resulting from the investment.”
- ²⁷ *Discussion Paper on the Evaluation of Economic Development*. October 2008. Federal Transit Administration, office of Planning and Environment.
- ²⁸ Reconnecting America’s Center for Transit oriented Development, *Hidden in Plain Site: Capturing the Demand for Housing Near Transit* (Oakland, CA: Reconnecting America, 2004).
- ²⁹ Karen Chapple. *Mapping Susceptibility to Gentrification: The Early Warning Toolkit*. August 2009. Retrieved on July 29, 2010 from: <http://communityinnovation.berkeley.edu/reports/Gentrification-Report.pdf>.
- ³⁰ Interview with Sharon Sprowls, Research Manager, Housing California. July 21, 2010.