

Regional Policy Options to Support Sustainable and Equitable Development

Increasingly, regional actors such as Metropolitan Planning Organizations and Councils of Government are recognizing the benefits of targeting infrastructure, housing, and economic development investments in a coordinated fashion to location-efficient areas. These are areas where residents can reduce the number and duration of necessary car trips, such as neighborhoods within walking distance of public transit stations or within walking, biking, or short driving distance of job centers, as well as village and town centers. Among many other benefits, policies to foster location-efficient development can generate:

- ▶ **Savings on public infrastructure costs** due to more intensive utilization of both existing and new infrastructure investments, such as water, sewer, and roadways
- ▶ **Reductions in energy use**, greenhouse gas emissions, commute times, and traffic congestion due to reductions in the number and frequency of necessary car trips
- ▶ **Increased ridership** to support public transit
- ▶ **Economic growth** arising from the clustering of people, jobs, and businesses

While desirable in many respects, the targeting of infrastructure investments to location-efficient areas can also have the unintended consequence of stimulating sizable increases in nearby land costs that price out the low- and moderate-income families who could benefit most from access to public transit and other amenities. Consider, for example, the impact of expanding a light rail transit system that provides good connectivity to jobs and other essential destinations in a region with a strong economic base. In many cases, developers will bid up the price of land around proposed stations based on the increased development potential of such well-located property. Similar price effects



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can sometimes be seen in neighborhoods undergoing more modest redevelopment activities as well.

Unless balanced by an effective affordable housing strategy, rising land prices will displace existing low- and moderate-income families, causing them to relocate to outlying locations. Higher housing prices may also reduce the share of the regional population that could be accommodated in location-efficient areas, undermining many of the energy and infrastructure costs savings associated with location-efficient development.

The solution to this dilemma is for regional institutions to encourage and support local policies that ensure that new development near transit stations and job centers and in village and town centers is affordable to families of all incomes. Such policies can help to:

- ▶ **Provide equitable access** to public transit and location-efficient areas by families of all incomes, races, and ethnicities

- ▶ **Minimize displacement** of existing residents, preventing a flight to more remote areas that would undermine the environmental and ridership goals of location-efficient development
- ▶ **Increase the diversity** and vitality of these communities
- ▶ **Advance public health goals** by expanding access to walkable neighborhoods and—by decreasing the combined costs of transportation and housing for low- and moderate-income families—increase the amount of funds such families have available to spend on nutritious food and health care

This paper summarizes the policy options available to regional officials interested in encouraging sustainable growth that is both equitable and location-efficient. These include steps to:

- 1. Provide financial support to enable communities to plan for and implement higher-density development in targeted areas near transit or other amenities.** To promote affordability, regional officials may condition eligibility for these grants on the adoption and implementation of a local policy to increase the availability of affordable homes.
- 2. Democratize access to a robust set of data to enable local jurisdictions to prepare for sustainable development.** Publicly available data tools provide a mechanism to inform local planning efforts and monitor progress toward regional goals.
- 3. Plan for new development to support the region's shared vision for growth.** A regional plan may also include specific strategies for achieving sustainable development at the local level.
- 4. Facilitate coordination among jurisdictions or across agencies to raise and/or leverage revenue.** Coordinated initiatives include joint development policies that prioritize the inclusion of affordable housing in new construction near transit stations and voluntary resource-sharing agreements among local jurisdictions, whether to further affordable housing development or other mutually determined goals.

This memo is part of a series on the policy options available to state, regional, and local governments to ensure that development oriented around transit, job centers, and in village and town centers includes housing options affordable to families of all incomes. Additional memos that address tools available at the local and state levels can be found at www.nhc.org/sustainable.html.

Who's Involved in Regional Planning?

While city councils and local planning departments may be more familiar players influencing local land use patterns, a variety of regional bodies also have an important role to play.

- **Councils of Government (COGs)** are voluntary interjurisdictional entities composed of elected officials from throughout the region. COG members work collaboratively to address issues of shared concern, including transportation, land use planning, and housing. COGs operate as private organizations, rather than governmental agencies, so they do not have taxing authority and decisions are not generally enforceable by law; however, the COG provides a venue for members to work together to pool resources and coordinate programs and services.
- **Mayors caucuses** fill a role similar to COGs in some regions, including the Chicago area, Denver, and Middle Tennessee. A mayors caucus gives the mayors of big cities and small towns a seat at the table, and promotes coordination and communication across the region.
- **Metropolitan Planning Organizations (MPOs)** — With passage of the 1962 Federal-Aid Highways Act, maintenance of a “continuing, comprehensive, and cooperative” planning process was established as a condition for receipt of federal transportation dollars in urbanized areas with more than 50,000 residents. Creation of the first MPOs came out of this requirement. MPOs bear primary responsibility for coordinating local transportation plans and for carrying out planning processes that result in the preparation of long- and short-range regional transportation plans. As the channel through which federal transportation dollars pass, MPOs use these plans to identify which projects and programs will receive federal funding in accordance with regional goals and priorities.¹

1 | Provide Financial Support to Enable Communities to Plan for and Implement Higher-Density Development in Targeted Areas Near Transit Or Other Amenities

When done well, location-efficient development offers advantages for residents (lower transportation costs, access to amenities) and localities (built-in transit ridership, opportunities to revitalize older neighborhoods, lower per capita infrastructure costs). However, higher-density projects near transit stations and other amenities often carry higher development costs than greenfield development on the fringes of the metropolitan area. These added costs stem from heightened competition for well-located land, the need to work with and gain approvals from multiple land owners and government agencies, the added costs associated with some higher-density structures and, in the case of transit-oriented development (mixed use development centered around a public transit station to maximize use of public transportation), the creation of infrastructure to support access to the transit station. Many metropolitan planning agencies and other regional entities provide funding to local jurisdictions to support pre-development planning and infrastructure improvements that help to mitigate these costs and support sustainable development near transit and in other well-located areas.

Offer Grants to Support Local Planning Processes

Many regions provide planning grants to encourage localities to plan for new transit-oriented development and improvements at existing station areas and town centers. Although the opening of a new transit station or retail or job center may be several years away, developers often act quickly to acquire strategically located sites, bidding up land costs and making it difficult and costly to ensure the availability of affordable homes and other key amenities and to structure growth in a coordinated manner in these desirable areas. To take advantage of new opportunities to promote sustainable development—and to avoid poorly designed or haphazard growth—localities often undertake planning around proposed station areas or other major development sites well in anticipation of new growth.

Planning grants support a variety of activities, including preparation of a station area master plan, market analysis, affordable housing or parking strategy, and eligibility for some programs is limited to projects in targeted location-efficient areas. For example, the Delaware Valley Regional Planning Commission's Transportation and Community

Development Initiative has supported projects ranging from park design to trolley and shuttle feasibility analysis to traffic calming studies in the region's core cities and older suburbs.² Many planning grant programs are sponsored by MPOs, which can set aside a portion of federal transportation funds to be used for this purpose. In some cases, planning grants may be paired with technical assistance (*see text box*).

In its long-range vision, the Denver Council of Governments (DRCOG, also the region's MPO) identifies nearly 200 Urban Centers, which are characterized as location-efficient mixed-use and activity areas near transit stations, in and around local downtowns, and along major transportation corridors. The DRCOG board adopted a goal of locating 50 percent of homes and 75 percent of jobs created between 2005 and 2035 within Urban Centers. In support of this goal, DRCOG has allocated \$3.5 million over four years to enable affected communities to plan for this growth.³ Local jurisdictions may request funding to prepare corridor-wide plans, urban center studies (which include a housing strategy, public spaces plan, and circulation plan, among

Technical Assistance

To meet the needs of local jurisdictions—particularly those that may have low capacity or limited experience with transit-oriented development—some regional programs pair planning grants with technical assistance. Through the *Transportation/Land Use Connections* (TLC) program, for example, the Metropolitan Washington Council of Governments works with a team of consultants to provide technical assistance to localities on a variety of topic areas, including infill design, public outreach processes, and other challenges associated with coordinating transportation and land use planning.⁴ As of FY 2012, successful applicants were eligible to receive up to \$60,000 in technical assistance.⁵ The TLC program also offers an online clearinghouse of information on sustainable development, and is intended to help localities fulfill the vision of the National Capital Region Transportation Planning Board (the region's MPO), which includes goals to promote mixed-use projects near transit, development that improves jobs-housing connections, and better coordination of transportation and land use planning across jurisdictions.

other requirements), or “next step” plans to further implementation of an urban center study.

Because multiple policies are often needed to preserve existing affordable housing and support the inclusion of affordable housing within new development in location-efficient areas, and because affordable housing policies are most effective and cost-efficient if adopted prior to new development taking place, it may make sense for regions to consider allotting funds specifically for the development of affordable housing strategies in these areas.

Issue Capital Grants to Support Improvements in Station Areas, Commercial and Retail Centers, and Other Location-Efficient Areas

Capital grants help to support the infrastructure investments that make location-efficient development successful, including projects that promote walking and biking in and around downtown neighborhoods and commercial and retail cores or enhance access to an individual transit station or connectivity between stations and other neighborhood amenities. Improvements may include the creation of bicycle routes and facilities; installation of sidewalks and pedestrian plazas; and the addition of trees, street lights, benches, and other features to improve safety or aesthetics. In some areas, capital grants

also help to cover cost premiums specifically associated with higher-density development in transit corridors. For example, Metro, the Portland, Oregon, area’s regional elected agency, helps to cover the cost of structured parking facilities, firewall separation between housing and retail uses, and elevators needed for high-rise development through its *Transit-Oriented Development* (TOD) program.⁶ This support can make a critical difference in determining whether an affordable or mixed-income housing project will pencil out.

A smaller number of regional entities also provide acquisition funds—typically as loans rather than grants—that enable localities to purchase land near transit stations and in other strategic areas. In the San Francisco Bay Area, for example, the Metropolitan Transportation Commission (MTC) sponsors the *Transportation for Livable Communities* (TLC) program, which since its launch in 1998, has awarded more than \$200 million in grant funding for innovative transportation and streetscape projects around public transit hubs, activity centers, and other locally designated priority development areas.⁷ In early 2011, MTC, which is also the region’s MPO, approved the creation of a revolving loan fund to finance acquisition of land in transit-accessible areas for development of affordable housing. Offered through the TLC program, MTC pledged \$10 million towards the *Bay Area Transit Oriented Affordable Housing Fund*, which will be supplemented by an additional \$40 million from financial institutions and philanthropic organizations.⁸

Planning in California Following Passage of SB 375

With passage of the *Sustainable Communities and Climate Protection Act*, also known as SB 375, every MPO in California became responsible for preparing a “sustainable communities strategy” (SCS) to be included in the Regional Transportation Plan. The SCS articulates the steps that will be taken to reduce vehicle miles traveled and achieve the regional greenhouse gas emissions reduction targets established in California’s *Global Warming Solutions Act* (AB 32). Upon approval from California’s Air Resources Board, the SCS becomes the guiding document for many planning and funding decisions. For example, only transportation projects consistent with the SCS are eligible for state transportation funds; similarly, regional housing allocation plans must align with the activities described in the SCS, creating a state-mandated link between local housing projections and transportation planning. SB 375 also provides exemptions from requirements in the *California Environmental Quality Act*, yielding significant time and cost savings to high-density mixed-use or residential transit-oriented “sustainable communities projects” that are in alignment with the SCS and meet certain other criteria. These include achieving minimum energy efficiency performance standards and density requirements and, optionally, including affordable housing. Other project proposals may be eligible to receive relief, if not a full exemption, from certain impact analysis requirements.



2 | Democratize Access to a Robust Set of Data to Enable Local Jurisdictions to Prepare for Sustainable Development

Metropolitan planning organizations and other regional entities are uniquely positioned to collect and analyze local data from a variety of public agencies and private organizations. Reliable data is an essential tool for identifying local jurisdictions and neighborhoods in which residents and workers may experience gaps in transit service; assessing disparities in the availability of grocery stores, healthcare facilities, and other amenities across local areas; and monitoring other trends and development patterns, including the distribution of subsidized and other affordable homes across the region. Publicly available data can also be used to create accountability for policy decisions and a

benchmark against which to assess regional changes. For example, the Chicago Metropolitan Agency for Planning (CMAP), the area's MPO, created the user-friendly website MetroPulseChicago.org to enable better local decision-making and provide a tool with which to measure progress in achieving goals laid out in *Go To 2040*, the region's comprehensive plan. MetroPulse includes data from nearly 50 different sources, including state departments, federal agencies, and local organizations. Indicators are organized into themes that reflect the categories originally identified in the plan, including education, health, housing, land use, and transportation.

3 | Plan for New Development to Support the Region's Shared Vision for Growth

With good reason, local officials tend to make policy decisions and adopt programs based on the best interests of their local jurisdiction. However, many of the factors that contribute to the growth or decline of an individual locality are strongly influenced by trends at the regional level. These factors include the opening of new public transit systems or corridors, which often cross local boundaries, and the development of new job or retail centers, which may be destinations for workers and residents from across the region, as well as overall demographic shifts that influence growth and development. Policies and planning documents prepared at the regional level address these overarching issues and lay out a coordinated vision for the region as a whole. Regional plans also establish a standard with which local plans in some areas must comply.

Adopt a Regional Plan to Strengthen Housing, Transportation, and Land Use Connections

Federal legislation establishes certain requirements for MPOs, including preparation of a long-range (20+ years) *Regional Transportation Plan* and a *Transportation Improvement Program* financial statement that describes the specific projects to which federal funds will be allocated over the short term. In addition to these federally mandated documents, some regions put together an additional set of planning documents that goes further to link housing,

transportation, and land use planning. In the late 1990s, for example, the nonprofit organization Envision Utah undertook a visioning and planning process for the Greater Wasatch Area region. With input from more than 20,000 residents, Envision Utah created the *Quality Growth Strategy*, a voluntary set of strategies for achieving goals related to air quality, infrastructure, mobility, and housing.⁹ Recommended strategies include the establishment of a cooperative fair share housing policy to encourage the development of affordable homes across the region, as well as the adoption of local land use policies that support development of homes affordable and suitable to a wide range of families.

Establish Growth and Annexation Policies That Support Development Within Targeted Areas

Local and regional authorities use several tools to manage sprawl and direct new growth to already developed areas. These growth management and annexation tools do not necessarily have an affordability component, and in some cases may actually contribute to higher housing costs (by limiting housing supply) when adopted without corresponding affordability policies. They do, however, help to limit unplanned and uncoordinated development on the outskirts of the metropolitan area, potentially reducing the time and distance new residents need to travel to access



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existing retail establishments, job centers, and public transit stations. Growth management tools can also make infill development more attractive to developers, helping to revitalize older urban centers and bring additional amenities to existing residents. For example, some regions limit eligibility for certain grant programs to infill districts or downtown neighborhoods that have been targeted for growth (e.g., Denver’s Urban Center planning grants), creating an incentive to site projects in those areas. Other growth management tools include:

- ▶ **Urban growth boundaries** (UGBs) impose strict limits on development to concentrate new growth within a specified area, often with the goal of preserving open space or agricultural areas. To the extent that they constrain supply, UGBs that are adopted without offsetting policies to promote affordability may have the unintended consequence of increasing housing costs. As with other growth management policies, it is important to simultaneously adopt affordable housing strategies to mitigate any adverse impacts.
- ▶ **Adequate public facilities ordinances and concurrency requirements** help to ensure that new development occurs only in areas with sufficient public infrastructure capacity to serve new residents. Where existing sewers, roads, fire stations, and other public services are not deemed adequate to meet the demand created by a proposed development, the developer must either provide the required services or suspend the project until infrastructure is in place. Housing costs in location-efficient areas may be impacted if infrastructure deficits contribute to shortages of supply in desirable

neighborhoods. Similarly, the costs of new development may be impacted if developers choose to pay for the new infrastructure and pass the added expense on to the consumer. Again, local or regional affordable housing policies can help to mitigate price impacts for low- and moderate-income households.

- ▶ **Annexation policies** — Without a plan for potential annexations, communities may find themselves either hemmed in by a patchwork of local jurisdictions or faced with sprawling and uncoordinated growth that occurs on an ad hoc basis. While cities and towns have principal responsibility for adopting the land use regulations that guide growth, regional bodies can help to bring together neighboring municipalities to plan for and streamline future annexation.¹⁰

The Twin Cities region uses a hybrid approach to managing growth that incorporates elements of these tools with its Metropolitan Urban Service Area (MUSA). Delineated by the Metropolitan Council, the MPO for the Twin Cities region, only communities within the MUSA line are guaranteed services and facilities provided by the Council.¹¹ This policy helps to guide new growth to already developed areas served by existing sewers, roadways, and other infrastructure. The MUSA boundaries are regularly adjusted to accommodate growth on a 20-year rolling basis that is consistent with local and regional plans; these decisions balance the desire to minimize or prevent the continued expansion of the metro area against concerns about restricting the supply of developable land to a level that drives up costs within the MUSA and promotes leapfrog development that leads to sprawl.

4 | Facilitate Coordination Among Jurisdictions or Across Agencies to Raise and/or Leverage Revenue

Regions are well-positioned to bring together the different entities involved in coordinating housing, transportation, and land use planning, including representatives from local jurisdictions and local and state agency staff. In addition to advancing coordinated planning efforts, these partnerships can focus on joining forces to get the most out of new or existing funding sources.

Actively Promote a Regional Joint Development Policy That Fosters Affordable Housing

The Federal Transit Administration's Joint Development Program enables transit agencies to form partnerships with private entities to develop agency-owned land near transit facilities for residential, commercial, or other uses. Qualifying projects are "physically or functionally related to transit" and commonly include improvements to station access, such as walkways,

bike paths, and parking facilities.¹² Several transit agencies explicitly encourage or require affordable housing within new joint development projects, which enables nonprofit or mission-driven developers to access location-efficient sites that might otherwise be too costly to acquire.¹³ Housing adjacent to the station helps transit agencies meet ridership goals, and the joint development arrangement provides a modest stream of income through land leases, air development rights, and other fees.

Joint development projects are frequently complex arrangements with multiple actors, and often require a long timeframe to implement. Proactive support by a transit authority (or other regional actor) can help to pave the way. The Washington Metropolitan Area Transit Authority (WMATA), for example, has used joint development agreements to create affordable housing opportunities around Metro stations in the Washington, DC region. As noted in WMATA's *Joint Development Policies and Guidelines*,¹⁴ the agency seeks to foster residential development around transit stations and, subject to WMATA Board approval, support "provision of affordable housing for staff to support recruitment of employees from outside the region and/or other goals."

Public Sector Roles

Transit-oriented and location-efficient development requires coordination and cooperation among many actors, including public officials at all levels of government. Each jurisdiction has a different role to play:

Local jurisdictions act mainly as a direct implementer of the land use policies that make location-efficient development possible. Localities are also typically responsible for responding to and managing relationships with the various stakeholders involved in a project, including local residents and business owners.

Regional organizations, including Councils of Government (COGs) and metropolitan planning organizations (MPOs), assist local communities in collecting data and creating plans to guide future growth. COGs and MPOs also often serve as a vehicle for coordinating local actors. MPOs have a critical role as the conduit through which federal funding for transportation projects is allocated.

State government is responsible for creating a vision for future growth, establishing overarching priorities and laying the ground rules for action at the regional and local levels. Many states also have state-generated financial resources to offer as incentives or to fund high-priority projects.

Collectively Promote Other Resource-Sharing Activities at the Regional Level

While localities may be inclined to cling tightly to available revenue in times of fiscal shortfalls, pooled resources and revenue-sharing agreements can help to improve the health of the region as a whole, yielding benefits for all local jurisdictions. For example, the Denver region's Metro Mayors Caucus is a cooperative, consensus-driven coalition of 40 mayors in the Denver region. Since 1998, members have been pooling their private activity bond allocations to provide more than \$100 million in downpayment assistance and low-cost mortgages for qualifying first-time homebuyers through the Single Family Mortgage Fund. In 2003, shortly before construction on the FasTracks transit expansion,¹⁵ seven mayors came together to create the TOD Bond Fund, which pools private-activity bond cap from cities along the proposed lines to support the development of multifamily rental projects around transit stations. In partnership with the Colorado Housing and Finance Authority, the fund makes available some \$65 million in affordable financing each year for private developers; to be eligible for bond funds, developers must set aside at least 20 percent of new units for low-income renters.

As the research affiliate of the National Housing Conference (NHC), the Center for Housing Policy specializes in developing solutions through research. In partnership with NHC and its members, the Center works to broaden understanding of the nation's housing challenges and to examine the impact of policies and programs developed to address these needs. Combining research and practical, real-world expertise, the Center helps to develop effective policy solutions at the national, state and local levels that increase the availability of affordable homes.

Ideas for Housing Policy and Practice

The Ideas series summarizes research on key housing policy topics in a format designed to be accessible to a wide range of readers.



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Resources

In September 2011, the Center for Housing Policy released an online policy guide, *Promote Sustainable and Equitable Development*. The guide, available through the www.HousingPolicy.org Toolbox, provides detailed information on many of the policy tools described in this brief. HousingPolicy.org is the Center's "one-stop shop" for information on state and local housing policy and includes additional policy guides on a range of topics, including increasing the availability of affordable homes and improving residential energy efficiency.

Planning for TOD at the Regional Scale: The Big Picture. 2011. Prepared by the Center for Transit-Oriented Development. Available at: <http://reconnectingamerica.org/assets/Uploads/RA204REGIONS.pdf>.

State and Regional Policy Guide. 2010. Prepared by Smart Growth America. Available at: <http://www.smartgrowthamerica.org/policy-guide>.

Transit-Oriented Development: Tools for Metropolitan Planning Organizations. 2010. Prepared by the Center for Transit-Oriented Development. Available at: http://www.reconnectingamerica.org/assets/Uploads/ctod_mpotod_final.pdf.

Endnotes

¹ Finkenbinder, Annie, Kelley Britt, and Catherine Cox Blair. 2010. *Transit-Oriented Development: Tools for Metropolitan Planning Organizations*. Washington, DC: Reconnecting America and the Center for Transit-Oriented Development. Available at: http://www.reconnectingamerica.org/assets/Uploads/ctod_mpotod_final.pdf.

² DVRPC is the MPO for the Philadelphia-Camden-Trenton metropolitan area. More information about the *Transportation and Community Development Initiative* is available on the DVRPC website at: www.dvrpc.org/TCDI/. DVRPC's Efficient Growth for Growing Suburbs (EGGS) Program supports planning in growing suburbs. While EGGS was not funded in 2011, program funding is expected to resume in future years.

³ More information is available on the DRCOG website at: www.drcog.org/index.cfm?page=StationAreaUrbanCenterPlanningFunds.

⁴ National Capital Region Transportation Planning Board. 2011. *Frequently Asked Questions (FAQs) about the TLC Program*. Available on the Metropolitan Washington Council of Governments website at: <http://www.mwcog.org/transportation/activities/tlc/about/faqs.asp> (accessed August 17, 2011).

⁵ Crawford, Sarah. 2011. *Transportation/Land Use Connections Program: FY 2012 Application Workshop*. PowerPoint presentation available on the Metropolitan Washington Council of Governments at:

http://www.mwcog.org/transportation/activities/tlc/pdf/TLC_Workshop-PPT_FY2012.pdf (accessed August 17, 2011).

⁶ Projects eligible for support through the TOD Program must be able to demonstrate (1) a cost premium associated with transit-oriented development and (2) the ridership impact associated with the proposed development. More information is available at: <http://www.reconnectingamerica.org/assets/Uploads/2011-portland-tod-final-web.pdf>.

⁷ More information is available on MTC's website at: http://www.mtc.ca.gov/planning/smart_growth/tlc/. Program updates in 2010 limited TLC awards to Priority Development Areas identified through the region's FOCUS program. More information on the FOCUS program is available at: <http://www.bayareavision.org/initiatives/prioritydevelopmentareas.html>.

⁸ More on the fund is available on MTC's website at http://www.mtc.ca.gov/news/press_releases/rel523.htm.

⁹ More information on Envision Utah and the Quality Growth Strategy is available at: http://www.envisionutah.org/eu_about_eu_qualitygrowthstrategy_main.html.

¹⁰ For more on "smart" annexation policies, see Nelson, Kevin, et al. 2009. *Essential Smart Growth Fixes for Urban and Suburban Zoning Codes*. Washington, DC: U.S. Environmental Protection Agency, pp. 38 - 41. See also: Municipal Research and Services Center

of Washington. 2009. *Annexation Handbook*. Available at: <http://www.mrsc.org/Publications/AnnexationHandbook200907.aspx> (accessed August 17, 2011).

¹¹ More information on the Twin Cities MUSA line is available on the Metropolitan Council's website at: <http://www.metrocouncil.org/about/facts/MUSAfacts.pdf>.

¹² U.S. Department of Transportation Federal Transit Administration. *Initiatives and Other Programs*. Available at: http://www.fta.dot.gov/publications/reports/about_FTA_140.html (accessed August 17, 2011).

¹³ Kniech, Robin, and Melinda Pollack. *Making Affordable Housing at Transit a Reality: Best Practices in Transit Agency Joint Development*. Denver, CO: FRESC and Enterprise Community Partners. Available at: <http://www.practitionerresources.org/cache/documents/673/67359.pdf>.

¹⁴ Washington Metropolitan Area Transit Authority. 2008. *WMATA Joint Development Policies and Guidelines*. Washington, DC: Author. Available at: <http://www.mwcog.org/uploads/committee-documents/IV5fWV5d20080310094734.pdf>.

¹⁵ The FasTracks program includes a broad range of activities, including 122 miles of new commuter and light rail, 18 miles of bus rapid transit, and enhanced bus service and connections within the eight-county Regional Transportation District of Denver.