



August 29, 2012

Office of the Secretary of Transportation
U.S. Department of Transportation
1200 New Jersey Avenue SE., Docket
Operations, M-30, Room W12-140,
Washington, DC 20590

RE: docket number DOT-OST-2012-0130; Letter of Interest for Credit Assistance Under the Transportation Infrastructure Finance and Innovation Act (TIFIA) Program on behalf of the National Housing Conference

Dear Secretary LaHood,

On behalf of the National Housing Conference, I am pleased to submit comments on the Notice of Funding Availability for the Transportation Infrastructure Finance and Innovation Act (TIFIA) Program.

In brief, the National Housing Conference urges the Department of Transportation to incorporate into TIFIA implementation the livability principles jointly adopted by DOT, HUD and EPA through the Partnership for Sustainable Communities, including the second principle of promoting equitable, affordable housing:

Promote equitable, affordable housing. Expand location- and energy-efficient housing choices for people of all ages, incomes, races, and ethnicities to increase mobility and lower the combined cost of housing and transportation.

We recommend incorporating these principles into the administration of TIFIA in three ways:

1. **Allow TIFIA funds to finance infrastructure costs associated with mixed-use projects that support increased ridership for public transit, such as transit-oriented development that includes housing affordable to families of all incomes.** Examples of such infrastructure expenses include structured parking, roads, walkways, sewers and parks. When developed as part of a project that will increase the number of households living within walking distance of a transit station, these and other similar expenses will advance the nation's transportation objectives by increasing transit ridership and reducing vehicle miles traveled and the emission of greenhouse gases associated with frequent and lengthy car trips.
2. **Require or incentivize the inclusion of housing affordable to low- and moderate-income families as well as market rate housing in any mixed-use projects supported with TIFIA infrastructure financing that include a residential component.** Because lower-income families are more likely than higher-income families to use public transit, this policy will boost ridership

and help ensure equitable access to transit for families of all incomes.

3. **Allow applicants to receive full or partial credit toward their required match for the affordable housing subsidies that they secure in connection with a project supported by TIFIA infrastructure funds.** This will encourage the preservation and development of affordable housing near transit and better coordinate the use of government resources.

About the National Housing Conference

The National Housing Conference (NHC) represents a diverse membership of housing stakeholders including tenant advocates, mortgage bankers, non-profit and for-profit home builders, property managers, policy practitioners, realtors, equity investors, and more, all of whom share a commitment to a balanced national housing policy. Since 1931, NHC has been dedicated to ensuring safe, decent and affordable housing for all in America—that commitment bringing together our broad-based membership has earned us a reputation as the United Voice for Housing engaging in nonpartisan advocacy on housing issues.

Since 2006, NHC and its research affiliate, the Center for Housing Policy, have been focused on improving the coordination of housing and transportation policy to advance shared policy goals, with a particular focus on preserving and expanding affordable housing in places near transit stations. The Center's publication, *A Heavy Load: The Combined Housing and Transportation Burdens of Working Families* along with subsequent Center research and NHC advocacy, has helped catalyze increased attention on this intersection as a way to improve the affordability of families' combined transportation and housing costs, to increase transit ridership and promote equitable access to transit, and to reduce vehicle miles traveled and the emissions of greenhouse gases. NHC's comments on the New Starts [proposed rule](#) and [guidance](#) develop several of these themes.

We would welcome an opportunity to meet with the FTA to discuss these recommendations.

Sincerely,



Chris Estes
President and CEO