



August 27, 2012

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

Dear Administrator Rogoff:

The undersigned organizations write to urge the Federal Transit Administration to move forward with finalizing its proposed regulatory changes to the Major Capital Investment Projects (New Starts/Small Starts) program to the extent they do not conflict with the recently enacted surface transportation reauthorization legislation. The proposed rule includes a number of important changes that simultaneously advance core national interests in the areas of transportation, housing, community development and the environment. We urge FTA to finalize these regulations as soon as possible.

Last spring, some of the undersigned organizations responded to FTA's [Proposed Rule](#) and [Policy Guidance](#) that proposed to amend the evaluation criteria for New Starts/Small Starts projects. Among other important changes, the proposed rule includes incentives for applicants to preserve and expand affordable housing near planned transit stations and to consider the location of affordable housing in designing new transit routes. Both proposals would contribute to ridership and equitable access to transit, while also advancing key housing and community development objectives. Through introduction of the 'betterments' principle, the rule could also allow grantees to innovate in a number of important ways, such as through the adoption of green and sustainable building practices. Our comments¹ expressed support for these changes and offered guidance on how a new rule could be effectively designed and implemented.

The recently-passed surface transportation reauthorization (MAP-21) amends existing transit law, including the authorizing legislation for New Starts/Small Starts. We strongly recommend finalizing those aspects of the proposed New Starts/Small Starts rule that do not conflict with the new legislation as soon as practicable. This will ensure that prospective grantees and their communities have the opportunity to benefit from FTA's proposals at the earliest possible time. Recognizing that FTA must follow appropriate rulemaking protocols and procedures, we respectfully request that you take action to institutionalize these changes as soon as is feasible.

Once again, thank you for your ongoing commitment to strengthening the coordination of transportation, housing, community development, and environmental policy. Please contact Michael A. Spotts of

¹ Comments by the undersigned organizations can be found at:

- <http://www.enterprisecommunity.com/policy-and-advocacy/testimony-and-public-comment>;
- http://nhc.org/media/files/Comments_on_New_Starts_Proposed_Rule.pdf;
- http://nhc.org/media/files/Comments_New_Starts_Guidance_03_23_2012.pdf; and
- <http://www.reconnectingamerica.org/assets/Uploads/20120326NewStartsComments.pdf>



Enterprise Community Partners (202-649-3902 or mispotts@enterprisecommunity.org) if you have any questions or would like to further discuss this issue.

Sincerely,

Enterprise Community Partners
Local Initiatives Support Corporation
Low Income Investment Fund
National Housing Conference
Reconnecting America
Smart Growth America

CC: The Honorable Ray LaHood, Secretary of Transportation
The Honorable Jeffrey Zients, Acting Director, Office of Management and Budget