



October 20, 2019

TO: TriMet Board of Directors
FR: Housing Oregon – Portland Metro Policy Council (PMPC)
RE: Comments on Proposed TriMet TOD Guidelines
Adopted by the PMPC on October 9, 2019

The Portland Metro Policy Council appreciates TriMet engaging with the nonprofit affordable housing community seeking input on proposed Transit-Oriented Development (TOD) Guidelines.

Faced with our region's current affordable housing crisis and increasing risks of homelessness and displacement, we believe it is critical all local jurisdictions commit to aggressive and specific goals towards the development of affordable housing. We believe the proposed TriMet TOD Guidelines, as presently written, do not make a clear commitment to inclusive community building. Based on past TOD efforts and TriMet's current engagement in the Southwest Corridor Equitable Housing Strategy, we know TriMet can do better.

We ask TriMet's board of directors to delay adoption of these guidelines at their October 23rd meeting, allowing for a more robust community engagement effort in the next 6-9 months with relevant stakeholders, including communities of color and others vulnerable to displacement (and most likely to be transit-dependent).

TriMet's own equity lens highlights where transit lines are particularly important and demonstrates the need for additional resources and protections along high frequency transit and other bus lines. While TriMet's limited control of land and regulations for property disposition limit certain direct impacts, it is critical that TriMet commit in all the ways it can to influence and prioritize affordable housing development and preservation, and to partner with other agencies to coordinate funding and investment to make this possible.

Having a system wide set of goals and guidelines is critical to seeing real success in this work. Using only a site by site analysis lends itself to a lack of accountability and puts undue amounts of pressure on local communities to continually make the case for the need for affordable housing at a time when the whole region has already expressed concern and a desire to address the lack of affordable housing.

The Metro T2020 funding measure under consideration will have a significant impact in multiple Metro transit corridors over the next generation. Affordable housing and anti-displacement measures must be a core component of any equitable TOD program, ensuring

that communities of color and low-income residents are not disparately impacted by future TriMet projects.

We ask that an equitable affordable housing TOD policy be adopted by the TriMet Board of Directors as a condition for Metro putting the T2020 measure on the ballot. It is critical for TriMet to shift more emphasis to affordable housing and anti-displacement measures in their proposed TOD Guidelines, similar to Metro's, and TOD policies from transit agencies in Seattle, San Francisco, and Los Angeles¹. The current proposed TOD Guidelines are not equitable and rely heavily on market rate housing development that can happen without public supports. TriMet's own research shows ridership goals are not achieved without enough affordable housing near even the best transit service². This impacts not just TriMet's financial sustainability and ridership goals but also runs counter to our region's goals to reduce carbon emissions.

We urge TriMet and its Board of Directors to adopt specific and quantifiable goals in their TOD Guidelines including:

- When TriMet disposes or transfers any surplus property, including property acquired prior to the adoption of the TOD policy, a minimum of eighty percent of the surplus property suitable for development as housing must first be offered for sale or long-term lease to housing authorities, nonprofit developers, and local governments that agree to develop affordable housing on the property.
- If a housing authority, developer, or local government receives discounted surplus property from TriMet, then TriMet must require a minimum of eighty percent of the housing units constructed be dedicated to regulated affordable rental and/or affordable homeownership opportunities for lower-income households.
- Meaningful land sale discounts of joint development sites to increase the affordability of housing projects.
- Coordination with agencies allocating funding for affordable housing in order to align transportation and housing investments.
- Utilize land banking as a strategy to hold value as the area develops along light rail lines and bus transit corridors.

At a minimum, the proposed TOD Guidelines should act as principles for guiding a more robust community engagement process that we believe can lead to a more equitable TOD policy. This engagement and the resulting goals help ensure communities of color and low-income communities can achieve a higher quality of life, one which includes taking advantage of future regional transit improvements.

¹ ShelterForce, "Affordable Housing on Transit Land" September 2019.
<https://shelterforce.org/2019/09/27/affordable-housing-on-transit-land/>

² TriMet Transit Center, "Economic Displacement May Be A Driver of Transit Ridership Loss", 2017.
<https://transitcenter.org/in-portland-economic-displacement-may-be-a-driver-of-transit-ridership-loss/>

Housing Oregon is a membership-based statewide association of affordable housing community development corporations (CDCs) committed to serving and supporting low-income Oregonians across the housing needs spectrum – from homeless to homeowner.

The Portland Metro Policy Council consists of Housing Oregon member organizations in the Portland metro area meeting once a month focused on affordable housing policy and advocacy efforts.

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