

# Oregon Transit and Housing Study

Statewide Policy Review

May 1, 2021

Prepared for the Oregon Department of  
Transportation by HDR, ECONorthwest,  
Parametrix and Multicultural Collaborative



## Contents

1	About the Transit and Housing Study .....	1
2	Purpose of the Statewide Policy Review.....	2
2.1	Policy and Regulatory Documents Reviewed .....	4
2.2	Summary of Findings .....	6
3	State-Level Policies and Regulations.....	12
3.1	Oregon’s Statewide Land Use Planning Goals .....	12
3.1.1	Oregon’s Statewide Land Use Planning Goals: Goal 9 Economic Development .....	12
3.1.2	Oregon’s Statewide Land Use Planning Goals: Goal 10 Housing .....	14
3.1.3	Oregon’s Statewide Land Use Planning Goals: Goal 12 Transportation Planning .....	17
3.1.4	Oregon’s Statewide Land Use Planning Goals: Goal 14 Urbanization .....	18
3.2	Land Use and Housing Related Policies.....	20
3.2.1	Oregon’s Transportation and Growth Management Program: Model Development Code.....	20
3.2.2	Oregon’s Transportation and Growth Management Program: Transportation Demand Management Module.....	23
3.2.3	Breaking New Ground: Oregon’s Statewide Housing Plan.....	25
3.2.4	State of Oregon Qualified Allocation Plan for Low Income Housing Tax Credits .....	27
3.2.5	House Bill 2001 - More Housing Choices for Oregonians .....	30
3.2.6	House Bill 2003 – Requiring Cities to Update Housing Needs Studies and Create Housing Production Strategies.....	32
3.3	Transportation Related Policies and Guidance.....	34
3.3.1	ODOT 2021-2023 Strategic Action Plan .....	34
3.3.2	ODOT Transportation System Plan Guidelines .....	36
3.3.3	Oregon Transportation Options Plan .....	40
3.3.4	Oregon Public Transportation Plan .....	42
3.3.5	ODOT Transit Development Plan Guidebook.....	45
3.3.6	Statewide Transportation Improvement Fund .....	47
4	Conclusions.....	51

## Tables

Table 2-1.	Statewide Policy and Regulatory Documents Reviewed.....	4
Table 2-2.	Support, Barriers and Gaps in Policies for Transit-Supportive Housing.....	7

## Acronyms and Abbreviations

DLCD	Department of Land Conversation and Development
DDA	Difficult to Develop area
EO	Executive Order
FMLM	First-Mile/Last-Mile
GHG	Greenhouse gases
HB	House Bill
HNA	Housing Needs Analysis
IRS	Internal Revenue Service
LIHTC	Low-Income Housing Tax Credit
MPO	Metropolitan Planning Organization
OAR	Oregon Administrative Rule
ODOT	Oregon Department of Transportation
OHCS	Oregon Housing and Community Services
ORS	Oregon Revised Statute
OTC	Oregon Transportation Commission
OTOP	Oregon Transportation Options Plan
OTP	Oregon Transportation Plan
PTD	Public Transportation Division
QAP	Qualified Allocation Plan
RHNA	Regional Housing Needs Analysis
RTP	Regional Transportation Plan
SAP	Strategic Action Plan
STIF	Statewide Transportation Investment Fund
SWHP	Statewide Housing Plan
TDM	Transportation Demand Management
TDP	Transit Development Plan
TGM	Transportation and Growth Management
TIA	Traffic Impact Analysis
TMA	Transportation Management Association
TO	Transportation Options
TOD	Transportation Oriented District or Development
TPR	Transportation Planning Rule
TSP	Transportation System Plan
UGB	Urban Growth Boundary

# 1 About the Transit and Housing Study

Transportation and housing have large, interrelated impacts on Oregonians' quality of life. Not only do they comprise the two largest expenses for a typical household, but the policy choices that the government makes about transportation and housing affect environmental and physical health outcomes, economic mobility\*, educational and cultural opportunities, the financial well-being of households and more (USDOT 2007).<sup>1</sup>

A desire to better understand the benefits of aligning housing and transportation policies has grown across the state, prompted by declining housing affordability and concerns about transportation's contributions to climate change. In 2020, the Oregon State Legislature asked the Oregon Department of Transportation (ODOT) to study policies and actions that could improve households' quality of life through increasing housing opportunities with easy connections to transit. In addition, the Oregon Transportation Commission (OTC)—the body responsible for setting statewide transportation policy—worked with ODOT to adopt a 2021-23 *Strategic Action Plan* (SAP) that includes climate equity and addressing climate change as key goals, along with improving access to active and public transportation and taking steps to address congestion in the Portland region.

This study is being conducted during a time when the State, ODOT and other state agencies are taking actions to address affordable housing and the role of public transportation in addressing issues such as climate change. Recent actions include the Governor's [Executive Order 20-04](#): Directing State Agencies to Take Actions to Reduce and Regulate Greenhouse Gas Emissions and the state legislature has recently passed and continues to propose legislation to address the lack of housing and affordable housing, which has been exacerbated due to COVID-19 and wildfires. This study provides an opportunity for ODOT to work with other agencies, departments and community partners develop transportation and housing strategies to improve accessibility and affordability for households in Oregon.

While ODOT is first and foremost a transportation agency and housing is not directly a part of its mission or vision, the agency seeks a better understanding of transportation and housing connections and recognizes that better alignment of housing and transportation can help achieve SAP goals. With these goals in mind, ODOT is pursuing this Transit and Housing Study for the following reasons:

- ODOT recognizes the bidirectional relationship between transportation planning and land use decisions and understands that a well-designed transportation system can bring economic value to a region by improving the connection between communities and their destinations, enable vibrant neighborhoods where commercial and social activities take place and reduce the need for major transportation investments in the future.

---

<sup>1</sup> Reconnecting America's Center for Transit-Oriented Development. 2007. *Realizing the Potential: Expanding Housing Opportunities Near Transit*. DC: U.S. Department of Transportation, Federal Transit Administration.

- ODOT and its partners recognize the importance of ensuring transportation, transit and housing plans work together, reinforcing the importance of partnerships and coordinated planning.
- ODOT helps fund multimodal transportation systems, transit and coordinated land use and transportation plans. This study can inform those plans and funding allocation.
- ODOT's Public Transportation Division (PTD), planners, project leaders and other staff throughout the agency can work to help implement or promote the results of this study.
- This work will help implement the Oregon Public Transportation Plan, which calls for integration of plans, supporting transit with housing and other topics to be addressed in this study.
- ODOT understands that regional plans that neglect social and environmental impacts can negatively affect housing affordability, cause displacement and increase greenhouse gas (GHG) emissions via sprawl and long commutes.<sup>2</sup> This can also contribute to racial and economic segregation of neighborhoods.

As this Transit and Housing Study progresses, a glossary of key terms will accompany each Transit and Housing Report. Throughout each document, an asterisk (\*) denotes that a term is defined in the glossary, which is organized by topic area. The asterisk (\*) is only provided on the first instance of the word.

This Transit and Housing Study will provide a foundation and understanding of how housing and public transportation ("transit") are linked and affect households' quality of life. At the conclusion of the study, the goal is to identify actionable strategies that local housing and planning departments, tribal governments and transit providers can take, given the unique circumstances throughout Oregon.

## 2 Purpose of the Statewide Policy Review

The Statewide Policy Review is the third in a series of white papers that will help ODOT and its partners better understand the relationship between transit, housing and land use policies and how these policies affect community quality of life. This white paper provides an overview of existing policies including:

- An inventory of statewide regulations, administrative rules, policies and guidelines that play a role in shaping land use, housing and transportation decisions.
- How statewide policies and the State play a role in setting policy frameworks and guidance, which influences local implementation of housing, land use and transportation investments, whether through regulatory requirements or general guidelines.

---

<sup>2</sup> Chapple, Karen and Anastasia Loukaitou-Sideris. 2019. Transit-Oriented Displacement or Community Dividends? Understanding the Effects of Smart Growth on Communities. MA: The MIT Press.

- How statewide policies and guidance promote the linkage between housing and public transportation in decision making, planning, development and transit investments.
- How statewide policies and guidance may set conflicting goals that hinder the coordination of housing and transportation investments that act as barriers to transit-supportive housing.
- Identification of gaps in statewide policies and guidance that, if addressed, could improve the coordination and outcomes between housing, land use and transit service that will ultimately affect community well-being at the local level.
- Limitations in what statewide policies or the compartmentalization of transportation and land use or housing agencies can achieve.
- Inclusion of recent policy initiatives, executive orders (EO) and legislation that can affect policy implementation or create new policy goals or new requirements for local jurisdictions.

This review examines sixteen policy and guidance documents within the State of Oregon's purview. While upstream (federal) and downstream (regional and local) policies perform important roles in the overall transit and housing framework, this review focuses on efforts for which the State performs a primary function. Further, while a review of specific place-based planning guidance (e.g. corridor plans and interchange area management plans) is beyond the scope of this study, the policies set forth in these implementing, place-based plans also serve important roles toward advancing transit and housing goals.

State agencies can provide policy direction and some funding but otherwise have limited authority to directly affect or implement local housing, land use or transportation decisions and investments. Many decisions about the provision of transit and housing are made at the local or regional levels consistent with State policies and guidance or in coordination with State agencies.

In their role setting policy direction, the State provides policy or regulatory frameworks, sets administrative rules for local implementation and administers the allocation of funds, often following federal requirements. While this policy review focuses on the Statewide Transportation Improvement Fund (STIF), described later in this report, this study recognizes that many other funding programs exist that support transit, and these programs have their own specific goals and eligibility criteria.

This study conducted the state-level policy review at a time when the state legislature and State are undertaking multiple initiatives to address climate change, housing affordability, the role of public transportation, and transportation and land use coordination. For example, some recent changes include legislation and EOs addressing climate action<sup>3</sup>, greenhouse gas reductions<sup>4</sup>, housing shortages<sup>5</sup> and issues of historic

---

<sup>3</sup> Executive Order 20-04, [https://www.oregon.gov/gov/Documents/executive\\_orders/eo\\_20-04.pdf](https://www.oregon.gov/gov/Documents/executive_orders/eo_20-04.pdf)

<sup>4</sup> Executive Order 17-20, [https://www.oregon.gov/gov/Documents/executive\\_orders/eo\\_17-20.pdf](https://www.oregon.gov/gov/Documents/executive_orders/eo_17-20.pdf)

<sup>5</sup> HB 2001 (2019) (<https://www.oregon.gov/lcd/UP/Pages/Housing-Choices.aspx>) and HB 2003 (2019) (<https://www.oregon.gov/lcd/UP/Pages/Housing-Needs.aspx>)

inequality<sup>6</sup>. This study acknowledges and expects the State to continue to evolve its policies in these areas, which will create new opportunities.

In the larger context of the Transit and Housing Study, it is important to provide a foundational understanding of the State’s role in guiding these local decisions. By recognizing the existing policy levers and guidance from the State, it is possible to start providing a better picture of how state, regional and local policies combine to produce outcomes for Oregon communities.

Moving forward in the study, the fifth white paper will provide a similar policy review, focused at the local level, examining opportunities and barriers for transit-supportive housing across a sample of Oregon communities. The sixth white paper follows this with a set of case studies examining how Oregon communities have implemented transit-supportive housing. Thus, the Statewide Policy Review sets the stage and provides insight into how the State influences these local policies and their implementation while the subsequent white papers will offer a detailed examination of ground-level policy application.

Through the combined findings of these white papers, ODOT and its partners will gain an understanding of how to develop a positive policy environment for coordinating housing, transportation and transit decisions.

## 2.1 Policy and Regulatory Documents Reviewed

Table 2-1 lists the statewide documents reviewed and discussed in this report.

**Table 2-1. Statewide Policy and Regulatory Documents Reviewed**

Policy Document	Year Published	Responsible Agency	Description
<b>Statewide Planning Goals</b>			
Land Use Planning Goal 9: Economic Development	Updated 2005	Department of Land Conservation and Development (DLCD)	Establishes framework for local jurisdictions to maintain a sufficient supply of land for employment and economic growth.
Land Use Planning Goal 10: Housing	Updated 2012	DLCD	Establishes framework for local jurisdictions to maintain a sufficient supply of land for housing and population growth.
Land Use Planning Goal 12: Transportation Planning	Updated 2014	DLCD	Establishes framework for transportation planning within Oregon.
Land Use Planning Goal 14: Urbanization	Updated 2016	DLCD	Establishes framework for Urban Growth Boundaries, within which urban growth occurs.

<sup>6</sup> Racial Justice Council, [https://www.oregon.gov/gov/policy/racial-justice-council/Pages/default.aspx?utm\\_source=GOV&utm\\_medium=egov\\_redirect&utm\\_campaign=https%3A%2F%2Fwww.oregon.gov%2Fraciajusticecouncil](https://www.oregon.gov/gov/policy/racial-justice-council/Pages/default.aspx?utm_source=GOV&utm_medium=egov_redirect&utm_campaign=https%3A%2F%2Fwww.oregon.gov%2Fraciajusticecouncil)

Policy Document	Year Published	Responsible Agency	Description
<b>Land use or Housing Related</b>			
HB 2001: More Housing Choices for Oregonians	2019	DLCD	Legislation that allows a more diverse and dense mix of housing options with residential zoning.
HB 2003: Requiring Cities to Update Housing Needs Studies and Create Housing Production Strategies	2019	DLCD	Legislation requiring cities to plan and implement strategies to meet future housing needs within their jurisdiction.
Model Development Code & Users Guide for Small Cities	Updated 2015	DLCD	Establishes a framework for local jurisdictions to follow when establishing zoning and development ordinances.
Transportation Demand Management* (TDM) Plans for Development	2013	DLCD	Provides an example of TDM tools and measures that local jurisdictions can put in place to better manage travel demand through land use.
Oregon's Statewide Housing Plan (SWHP)	2019	Oregon Housing and Community Services (OHCS)	Establishes a strategic vision for OHCS and fundamentally rethinks the delivery of affordable housing within Oregon.
Qualified Allocation Plan (QAP) for Low Income Housing Tax Credits	Updated 2019	OHCS	Provides guidance and financing for affordable housing development.
<b>Transportation Related</b>			
ODOT Strategic Action Plan (SAP)	2020	ODOT	Creates a new strategic vision for ODOT as an organization and establishes new goals for the agency.
Transportation System Plan (TSP) Guidelines	Updated 2020	ODOT	Establishes the framework that local jurisdictions follow when updating TSP documents.
Oregon Transportation Options Plan (OTOP)	2015	ODOT	A statewide policy plan that supports and guides state, regional and local decision-making regarding transportation options.
Statewide Transportation Improvement Fund (STIF)	Updated 2020	ODOT	A transit funding program with funds dedicated to expanding and improving transit access to underserved communities and locations.
Oregon Public Transportation Plan (OPTP)	2018	ODOT	A statewide policy plan that supports and guides state, regional and local decision-making regarding transit

Policy Document	Year Published	Responsible Agency	Description
Transit Development Plan (TDP) Guidebook	2018	ODOT	Establishes guidelines for transit planning that local transit providers follow when creating TDP documents.

## 2.2 Summary of Findings

The table below summarizes key findings of the statewide policy review (documents listed in Table 2-1). The findings presented in Table 2-2 include existing support for transit-supportive housing,\* barriers and gaps in existing policies and opportunities that have the potential to produce an improved state-level policy framework and guidance for transit-supportive housing outcomes.

**Table 2-2. Support, Barriers and Gaps in Policies for Transit-Supportive Housing**

Document	Support	Barriers	Gaps	Opportunities
Goal 9: Economic Development	No direct support	Goal 9 may prohibit the inclusion of housing near transit when land use is designated commercial or industrial.	Location factors are considered when planning for employment uses. These same factors are not considered when planning for other uses.	<ul style="list-style-type: none"> <li>• Increase encouragement for performance measures that include location factors, such as proximity to transit.</li> <li>• Encourage jurisdictions to consider rezoning for higher densities or mixed uses near transit.</li> </ul>
Goal 10: Housing	<ul style="list-style-type: none"> <li>• Supports housing through infill, up-zoning or rezoning when not enough land is available to accommodate growth.</li> <li>• Supports planning for affordable housing in neighborhoods with abundant amenities, including transit.</li> <li>• Recent administrative rule changes encourage the creation of compact, mixed-use neighborhoods in locations that reduce greenhouse gas emissions.</li> </ul>	<ul style="list-style-type: none"> <li>• Cities may lack clear rules around the inclusion of housing in commercial areas that often have access to transit.</li> <li>• Jurisdictions may meet the majority of their housing needs (including affordable housing) with development on the edges of urbanized areas. This includes urban growth boundary (UGB) expansions to accommodate housing needs.</li> </ul>	There are no specific requirements that support developing housing near transit.	HB 2001 and HB 2003 are opportunities to provide guidance on better aligning housing and transit planning to address affordable housing and help reduce GHG emissions.
Goal 12: Transportation	<ul style="list-style-type: none"> <li>• Supports planning transportation facilities and transit that complement land use decisions.</li> <li>• Encourages higher density development to be principally served by mass transit.</li> </ul>	No identified barriers.	Goal 12 makes no direct mention of housing.	<ul style="list-style-type: none"> <li>• EO 20-04 directs ODOT to establish GHG emissions reduction targets, performance measures and update the Transportation Planning Rule implementing Goal 12.</li> <li>• Encourage the connection between housing and transit through infill development and higher densities.</li> </ul>

Document	Support	Barriers	Gaps	Opportunities
Goal 14: Urbanization	<ul style="list-style-type: none"> <li>Options for accommodating housing near transit should be considered when considering UGB expansion,.</li> <li>Transit facilities should be considered to support urban area expansion.</li> </ul>	No identified barriers.	Availability of developable land and political challenges may lead to housing predominately being accommodated on the edges of urban areas.	<ul style="list-style-type: none"> <li>Encourage future development to be served with transit during UGB expansion process.</li> <li>HB 2001 and HB 2003 are opportunities to provide jurisdictions guidance that better aligns housing and transit planning around issues of affordable housing and GHG emissions reductions.</li> </ul>
Model Code	<ul style="list-style-type: none"> <li>The Model Code offers sample code language that supports compact, mixed-use and transit-connected neighborhoods through design standards, pedestrian access standards and parking requirements.</li> </ul>	No requirement that local jurisdictions follow the Model Code.	<ul style="list-style-type: none"> <li>The Model Code does not include language on transit or bicycle circulation.</li> <li>The Model Code does not offer guidance on developing housing near transit.</li> </ul>	<ul style="list-style-type: none"> <li>Encourage the adoption of the Model Code's suggested reductions for off-street parking, transit integration and parking maximums.</li> </ul>
Model TDM	<ul style="list-style-type: none"> <li>Supports jurisdictions creating TDM plans and establishing TDM requirements in the development review process.</li> </ul>	No identified barriers.	<ul style="list-style-type: none"> <li>Adopting TDM requirements as a part of development review could have the unintended consequence of raising prices on housing. This could place constraints on new housing construction.</li> </ul>	<ul style="list-style-type: none"> <li>Encourage more jurisdictions to adopt TDM plans or include TDM development code language.</li> <li>TDM requirements for travel surveys can support mode share and GHG emission reduction targets stemming from EO 20-04.</li> </ul>
Statewide Housing Plan	<ul style="list-style-type: none"> <li>Suggests aligning affordable housing investments with transit investments.</li> <li>Supports reducing the overall cost burden placed on households stemming from both housing and transportation costs.</li> </ul>	No identified barriers.	<ul style="list-style-type: none"> <li>The SWHP lacks implementation strategies to reduce transportation costs for affordable housing in rural settings.</li> <li>Trade-offs exist between providing affordable housing in transit rich areas and higher costs of</li> </ul>	Many SWHP actions suggest better alignment between affordable housing investments and transit investments. This provides an opportunity for more concerted coordination and planning between these two issues.

Document	Support	Barriers	Gaps	Opportunities
			developing projects in such areas.	
Qualified Action Plan	<ul style="list-style-type: none"> <li>Includes scoring criteria for location efficiency measures, (e.g., proximity to transit) that supports affordable housing near transit.</li> <li>The funding mechanism directly supports developing affordable housing near transit.</li> </ul>	<ul style="list-style-type: none"> <li>The traditionally high cost of land near transit can act as a barrier to developing affordable housing.</li> <li>Developers face trade-offs between the location efficiency scoring criteria and other scoring criteria that encourage affordable housing away from transit.</li> </ul>	The financial benefits for affordable housing projects in rural areas are less defined and not tied to location criteria, such as proximity to transit.	The QAP is regularly updated and could support transit-supportive housing should it become a policy objective at the state level.
House Bill 2001 (of 2019)	Encourages more housing density and housing types in residential zones that can better support transit service.	Allowing higher-density residential development in former lower-density neighborhoods could increase the population with poor access to transit.	Lacks a comprehensive approach to planning that considers transportation needs for the new residential densities.	Administrative rules should consider state-level policies and guidance for transportation planning in response to increased densities.
House Bill 2003 (of 2019)	The Housing Needs Analysis and Production Targets will generate more focused attention on accommodating housing needs and could lead to transit-supportive housing policies.	The regional aspect of the analysis could lead to more dense housing developed in former lower-density neighborhoods not served by transit.	A regional framework addressing shared accountability in housing production across jurisdictions is needed to ensure housing served by transit.	Administrative rules should include guidance directing regional housing production strategies near existing transit service.
Strategic Action Plan	The focus on GHG emissions reductions and the priority to expand transit access complements transit-supportive housing.	No identified barriers; however, large organizational change presents challenges in balancing new priorities with existing priorities.	Lacks implementation plans for many of the priorities outlined. However, this is a first step for most of the priorities outlined in SAP.	New priorities outlined in SAP are opportunities to reexamine existing ODOT policies and guidance to understand how they can be aligned with transit-supportive

Document	Support	Barriers	Gaps	Opportunities
				housing and policy initiatives such as EO 20-04.
Transportation System Plan Guidelines	Local TSP documents must be consistent with state and regional plans and established policy (e.g., OTP, OTOP) that support or complement a connection between housing and transit.	Guidance for identifying and addressing transportation deficiencies revolve around capacity constraints, which are most strongly associated with vehicle capacity. This can lead to auto-oriented solutions if not balanced with measures focused on transit and active modes.	<ul style="list-style-type: none"> <li>• Less emphasis on evaluation measures for transit and active transportation modes.</li> <li>• Land use policy tools as a means to address transportation issues are limited in scope.</li> <li>• TDM measures are limited in scope and the communities that are directed to consider TDM solutions are limited.</li> </ul>	<ul style="list-style-type: none"> <li>• Further develop guidance on land use tools that address transportation needs.</li> <li>• Expand the list of TDM measures that can be considered during the TSP process.</li> <li>• Develop performance measures directed at transit-supportive housing.</li> </ul>
Oregon Travel Options Plan	Offers policies and strategies broadly endorsing transit-supportive housing (e.g., developer incentives, multimodal level of service measures, parking management, complete "20-minute neighborhoods").	Provides strategies that support park-and-ride facilities. Developing park-and-ride facilities is a direct trade-off with developing housing on land adjacent to transit.	Many policies and strategies require a high degree of coordination, potentially complicating implementation efforts.	Many policies and strategies broadly complement transit-supportive housing. Finding appropriate ways to adopt these throughout ODOT programs could better support transit-supportive housing.
Oregon Public Transportation Plan	<ul style="list-style-type: none"> <li>• Recognizes a strong link between transit and housing density.</li> <li>• Presents strategies and actions that attempt to fully align planning for housing and transit.</li> </ul>	No identified barriers.	Outlines many priorities and goals including housing. All goal areas must be balanced. Addressing housing requires substantial coordination with other state agencies and local partners.	Prioritizing actions and strategies that further transit-supportive housing could help focus ODOT's role in complementing transit-supportive housing practices.

Document	Support	Barriers	Gaps	Opportunities
Transit Development Guidebook	<ul style="list-style-type: none"> <li>• Offers tools for matching appropriate transit service with various housing and employment densities.</li> <li>• Provides specific actions and analysis methods for determining transit needs including mapping low-income households and gaps in service.</li> </ul>	No identified barriers.	<ul style="list-style-type: none"> <li>• Lacks guidance on planning transit service in conjunction with Transit Oriented Development.</li> <li>• Lacks guidance on engaging developers, housing authorities and land use planners to ensure coordination between new housing and transit.</li> </ul>	Guidance specifically addressing transit-supportive housing outcomes, analysis methodologies and evaluation tools could be added to the TDP.
Statewide Transportation Investment Fund	STIF funding supports new, expanded or improved transit service to low-income populations and areas previously not well served by transit.	No identified barriers.	No specific land use or location efficiency measures within the scoring criteria for STIF discretionary funds.	Additional funding evaluation criteria from the OPTP regarding land use or transit-supportive housing could be added to the funding evaluation criteria.

## 3 State-Level Policies and Regulations

This section summarizes each policy document or regulation reviewed. Each summary includes information about the document's contents, intent and the primary agency or set of partners responsible for implementing each document's policies. Each summary describes opportunities for existing policies to be leveraged or how small adjustments could encourage transit-supportive housing. Each summary also describes how a policy document or regulation may create barriers against providing transit-supportive housing or leave gaps in policy direction for transit-supportive housing.

### 3.1 Oregon's Statewide Land Use Planning Goals

The Oregon Land Use Planning Act of 1973 (Oregon Revised Statute [ORS] Chapter 197) established 19 statewide land use planning goals that govern how the State and local jurisdictions utilize and manage their land. The goals express statewide land use policy on a range of topics, including: citizen involvement in the planning process, managing forests and coastlines; planning for housing and transportation; and energy conservation, among others.

The Oregon DLCDC is the state agency responsible for carrying out the vision and legacy of these planning goals by providing policy direction and technical assistance for the land use planning program and helping local governments work toward implementing the goals. Local jurisdictions must adopt their own plans that are consistent with these goals and the rules that implement them.

#### 3.1.1 Oregon's Statewide Land Use Planning Goals: Goal 9 Economic Development

##### 3.1.1.1 Overview

Goal 9<sup>7</sup> of Oregon's statewide land use planning goals is about economic development. It provides guidelines for local governments to follow in developing their local comprehensive land use plans and implementation policies. Essentially, it guides planning efforts to ensure that local governments have enough land to accommodate employment and economic growth and development opportunities.

Transit and housing are not directly addressed in Goal 9, though they may be influenced by the policy.

##### *Purpose*

The purpose of Goal 9 is to ensure that local governments are planning for long-term employment growth. Jurisdictions are required to evaluate their industrial and other employment land supply, the major types of industrial and commercial employment uses that could locate or expand in the planning area and the number of sites by employment type that are expected to be needed to accommodate projected employment growth.

---

<sup>7</sup> Goal 9: <https://www.oregon.gov/lcd/OP/Documents/goal9.pdf>

Local governments provide evidence that they have sufficient land available to accommodate growth over a 20-year planning period. If the jurisdiction does not have sufficient land, it must take the proper measures to amend plans, zoning, land use regulations or expand its Urban Growth Boundary\* (UGB) to accommodate the expected growth.

#### *Responsible Implementing Entity*

Goal 9, and the administrative rules that implement it (Oregon Administrative Rule [OAR] 660-009), directs local governments to implement it as part of their economic comprehensive plan and economic development policies. DLCDC is responsible for assisting local governments with implementation and ensuring jurisdictions meet the Goal 9 administrative requirements laid out in the administrative rule. DLCDC provides advice and grant support to local jurisdictions for technical assistance to conduct Goal 9 analyses.

### 3.1.1.2 Findings

DLCDC monitors and enforces the implementation of all 19 statewide land use planning goals through the review and approval of local jurisdictions' comprehensive plans, land use plans and development review decisions. Goal 9 does not explicitly support or conflict with transit-supportive development or the co-location of housing and transit, but there are indirect trade-offs that cities and counties must make as they work to implement the goals within their jurisdictions.

#### *Supportive Policies or Tools*

Goal 9 does not directly support or encourage transit-supportive housing. As primary implementers of Goal 9, cities, counties, state agencies and tribal governments must plan for existing and future land use needs to support economic development through a 20-year planning period. Goal 9 is primarily concerned with providing adequate designated land use to support economic development and employment. The goal does not directly address transportation or transit access to employment as a key concern of the goal.

#### *Policy Barriers or Conflicts*

Goal 9 and the administrative rules that implement it can become a barrier to planning for housing in transit-served locations in instances where a jurisdiction has planned and zoned their downtown or other commercial areas for commercial use and is considering allowing housing in those areas. If a jurisdiction is considering allowing housing outright in commercial areas (not in a mixed-use building that has a commercial component), they should plan for sufficient opportunities for employment land needs under Goal 9. A jurisdiction can find other ways to meet employment land needs, but this may present an obstacle and delay if they need to rezone other areas or expand the UGB.

#### *Gaps or Deficiencies in Policies*

The administrative rule that implements Goal 9 requires jurisdictions to consider locational factors when planning for employment uses. For example, location factors may consider "proximity to raw materials, supplies, labor, services, markets, or educational

institutions; access to transportation and freight facilities such as rail, marine ports and airports, multimodal freight or transshipment facilities, and major transportation routes; and workforce factors (e.g., skill level, education, age distribution),” (OAR 660-009-0005).

### *Opportunities*

The need to plan for employment, housing, transportation and all other land uses grows more complex as Oregon communities continue to grow in population and employment. Jurisdictions must prove they have enough land to accommodate these different uses as competing needs and uses arise. To do this without expanding UGBs, many jurisdictions will need to adopt measures that make their land more efficient and allow higher intensity uses. These changes—such as rezoning for higher density or mixed-use\*—generally encourage transit-supportive development. DLCDC and state planning goals strongly encourage and emphasize coordination between plans and between jurisdictions.

A potential change to Oregon’s administrative rules could be to strengthen the discussion of location factors requiring jurisdictions to consider the proximity of some commercial and/or appropriate light-industrial employment uses near transit, which could also offer a greater incentive for housing to be located near transit.

## 3.1.2 Oregon's Statewide Land Use Planning Goals: Goal 10 Housing

### 3.1.2.1 Overview

Goal 10<sup>8</sup> focuses on housing. It provides guidelines for local governments when developing their local comprehensive land use plans and implementing policies. Specifically, it requires incorporated cities to complete an inventory of buildable residential lands, determine whether the jurisdiction has sufficient land to accommodate population growth and encourage development of housing units at price and rent ranges commensurate with the financial capabilities of its households.

Transit is not directly addressed in Goal 10, though the presence of transit can influence choices local jurisdictions make to meet housing needs, as well as the prices and rents of housing available to residents.

### *Purpose*

The purpose of Goal 10 and the administrative rules that implement it (OAR 600-007 and OAR 600-008) is to ensure local governments plan for needed housing types across the income spectrum. ORS 197.303 defines needed housing types as the following:

- Housing that includes, but is not limited to, attached and detached single-family housing and multiple family housing for both owner and renter occupancy.
- Government assisted housing.
- Mobile home or manufactured dwelling parks as provided in ORS 197.475 to 197.490.

---

<sup>8</sup> Goal 10: <https://www.oregon.gov/lcd/OP/Pages/Goal-10.aspx>

- Manufactured homes on individual lots planned and zoned for single-family residential use that are in addition to lots within designated manufactured dwelling subdivisions.
- Housing for farmworkers.

Local governments must provide evidence that they have sufficient land to accommodate population growth over a 20-year planning period. If the jurisdiction does not have sufficient land, it must implement measures to accommodate growth of needed housing, expand its UGB, or both. Measures to accommodate needed housing growth can include a wide range of policy changes that increase the efficiency of land use within the UGB, including increasing residential development densities, allowing more types of housing (especially denser housing), rezoning\* land for higher intensity residential uses, implementing funding sources to pay for infrastructure that supports needed housing development or reducing regulatory requirements to improve development feasibility\*.

#### *Responsible Implementing Entity*

Cities are responsible for implementing Goal 10 as part of the housing element and corresponding policies in their comprehensive plan. DLCD is responsible for assisting local governments with implementation and ensuring jurisdictions meet the Goal 10 administrative requirements laid out in the administrative rules, as well as requirements in numerous ORS. DLCD often provides technical assistance in the form of grants to conduct Goal 10 analyses and advice.

### 3.1.2.2 Findings

DLCD monitors and enforces the implementation of statewide land use planning goals through the review and approval of local jurisdictions' comprehensive plans, land use plans and development review decisions. Cities and counties are the entities responsible for implementing the statewide planning goals. Thus, the interactions between housing, transportation (discussed in section 3.1.3) and other land uses vary across the state. While these jurisdictions work to implement Goal 10, the measures they take to plan and zone for housing will certainly interact with public transportation.

#### *Supportive Policies or Tools*

Goal 10 requires jurisdictions to plan for needed housing types as defined in ORS 197.303. If a jurisdiction does not have sufficient land to accommodate its needed housing, it may take measures that increase the efficiency of residentially zoned land, including allowing denser housing. In many areas, allowing more multifamily and/or higher-density housing encourages transit-supportive development.

In addition, a recent update to Goal 10 administrative rules in OAR 660-008 requires cities to plan for fair and equitable housing outcomes and increase housing choice, which includes "access to existing or new housing that is located in neighborhoods with high-quality community amenities, schooling, employment and business opportunities, and a healthy and safe environment." Transit opportunities may be considered a high-quality community amenity. The changes to OAR 660-008 also require cities to establish policies that are consistent with statewide GHG emission reduction goals "by creating

compact, mixed-use neighborhoods available to people part of state and federal protected classes.”

### *Policy Barriers or Conflicts*

Goal 10 and the administrative rules that implement it do not create substantial direct barriers to local governments that choose to encourage transit-supportive housing. However, cities must demonstrate that they can accommodate needed housing growth on lands where housing development is permitted outright, with clear and objective standards. Some commercial areas do not have a clear and objective path for housing development, which means the city cannot include capacity for future housing in those commercial areas in their plans to accommodate needed housing growth.

However, one—likely unintended—consequence of the requirements under Goal 10 is that some jurisdictions end up meeting some or all of the need for land for multifamily housing in UGB expansion areas that are located at the edges of the city and often do not have transit service. While jurisdictions have the option to rezone land within the city instead, this can be politically challenging, and there may be few vacant or underutilized properties large enough for efficient multifamily development in more central locations. With sufficient scale and thoughtful design and development orientation to rights-of-way, locating high density development at the edge of the city can create new nodes of transit-supportive housing in outlying areas that may someday support transit service, but it can take time before service is extended to those areas and, in some cases, may be difficult for transit agencies to serve because of distances.

### *Gaps or Deficiencies in Policies*

There are no specific requirements outlined in Goal 10’s administrative rules to support development of housing near transit (i.e., no housing production target\* or required allocation of housing near major transit corridors). However, recent changes in OAR 660-008 direct cities to consider the location of housing, emphasizing creation of compact, mixed-use neighborhoods in locations that reduce GHG emissions. Potential changes could outline the need to plan for housing along transit corridors more explicitly. However, given the range of transit service available in different communities, such a requirement might not be equally applicable or appropriate in all communities, especially mid-sized and smaller cities.

### *Opportunities*

The passage and implementation of House Bills (HB) 2001 and 2003 (discussed in sections 3.2.5 and 3.2.6, respectively) will likely present opportunities for jurisdictions to better align transit and housing and encourage the development of transit-supportive housing in the coming years. As discussed in their respective sections, these bills will likely shift the ways in which local jurisdictions plan for housing development (HB 2003) and housing density (HB 2001). To the extent that jurisdictions align their policies to address affordability challenges, equitable housing needs, or greenhouse gas emissions, these HBs could result in an increased emphasis on plans that co-locate housing and transit.

### 3.1.3 Oregon’s Statewide Land Use Planning Goals: Goal 12 Transportation Planning

#### 3.1.3.1 Overview

Goal 12<sup>9</sup> governs transportation planning with the aim of providing and encouraging “a safe, convenient and economic transportation system.” The Goal (recorded in state regulations as OAR 660-015-0000[12]) provides guidelines for planning and implementing the transportation system at all levels of planning.

##### *Purpose*

Goal 12 establishes a standard for all transportation planning in the state. Goal 12 advises planners to comprehensively consider all modes of travel, plan for transportation to support planned future land uses, consider equity when making investments, provide transportation options (TO) and create multimodal systems that minimize environmental impacts, support the economy and expand transportation access for the transportation disadvantaged.\* Transportation disadvantaged individuals are those who do not have easy access to a personal vehicle and may live in locations without convenient and safe TO.

##### *Responsible Implementing Entity*

As a statewide policy, Goal 12 applies to local, regional, and statewide transportation planning and guides all public agencies that conduct planning. As with the other planning goals, DLCD oversees the goals while local jurisdictions implement them through local planning efforts. Goal 12 is implemented through the Transportation Planning Rule (TPR) (OAR 660-012), which provides detailed guidance to jurisdictions on transportation planning, including requirements for transportation plans.

#### 3.1.3.2 Findings

##### *Supportive Policies or Tools*

Statewide Planning Goal 12 requires that all transportation modes, including transit and connections to it (e.g. sidewalks), be considered during planning efforts, such as TSP updates. The Goal also supports land use planning for areas that will be served by transit investments. The guidance suggests that transit investments should align with land use and community priorities outlined in a local comprehensive plan:

“Lands adjacent to major mass transit stations, freeway interchanges, and other major air, land and water terminals should be managed and controlled so as to be consistent with and supportive of the land use and development patterns identified in the comprehensive plan of the jurisdiction within which the facilities are located.”

The guidelines indicate that “high density developments with concentrated trip origins and destinations should be designed to be principally served by mass transit.”

Additionally, the goal instructs planners to “consider the differences in social consequences that would result from utilizing differing combinations of transportation

---

<sup>9</sup> Goal 12: <https://www.oregon.gov/lcd/OP/Documents/goal12.pdf>

modes,” considering equity for transportation-disadvantaged populations in expanding TO.

#### *Policy Barriers or Conflicts*

There are no guidelines in Goal 12 that hinder or act as a barrier between transit and housing.

#### *Gaps or Deficiencies in Policies*

Housing is not directly addressed in Goal 12. However, Goal 10, Housing, suggests that transit opportunities may be considered a high-quality community amenity with regard to housing planning.

#### *Opportunities*

The Statewide Land Use Planning Goals were originally passed by the Oregon Legislature under ORS Chapter 197 and are revised infrequently. The recent legislative actions addressing housing and EO on climate and equity policy present a potential opportunity. These policy initiatives provide an opportunity to reexamine TPR and other policies, guidance and processes that implement Goal 12. The addition of one or several guidelines that directly encourage transit investment and transit improvements in areas of higher housing density would strengthen the implied connection between housing and transit service.

### 3.1.4 Oregon's Statewide Land Use Planning Goals: Goal 14 Urbanization

#### 3.1.4.1 Overview

Goal 14<sup>10</sup> deals primarily with urbanization. It requires cities, counties, and regional governments to jointly establish and maintain UGBs wherein urban levels of development are allowed.

Goal 14 provides criteria to consider when local governments seek to amend their UGBs. Amendments are designed to provide a 20-year land supply based on criteria set forth in Goal 9 for employment land and Goal 10 for residential land. If the need for a UGB amendment is established, local governments must provide evidence as to why the existing UGB has insufficient capacity to meet residential/employment land needs.

Transit and transportation are important parts of urban growth planning. Incorporated cities with more than 2,500 people must create a TSP, and DLCDC states that comprehensive planning within a UGB should support efficient land use focused on creating communities that are livable and walkable.

#### *Purpose*

The purpose of Goal 14 is to:

- Provide for an orderly and efficient transition from rural to urban land use.

---

<sup>10</sup> Goal 14: <https://www.oregon.gov/lcd/OP/Documents/goal14.pdf>

- Accommodate urban population and urban employment inside UGBs.
- Ensure efficient use of land.
- Provide for livable communities.

#### *Responsible Implementing Entity*

Cities, counties, and regional governments are responsible for implementing Goal 14, when needed to accommodate growth by amending their UGBs. DLCDC is responsible for assisting local governments with implementation and ensuring jurisdictions meet Goal 14 and OAR 600-024.

#### 3.1.4.2 Findings

DLCDC monitors and enforces the implementation of statewide land use planning goals while cities, counties and tribal governments are responsible for implementing the goals. Goal 14, Urbanization, certainly interacts and influences how cities and counties plan for transportation (discussed in section 3.1.3), economic development, and housing, among other land uses. The process of UGB expansion involves land use and transportation planning considerations that may include transit and first-mile/last-mile (FMLM) connections if such services are context appropriate.

#### *Supportive Policies or Tools*

Goal 14 states that “the type, design, phasing and location of major public transportation facilities (i.e., all modes: air, marine, rail, mass transit, highways, bicycle and pedestrian) and improvements” are expected to be considered to support urban expansion. This suggests that areas to accommodate housing need should consider areas near transit facilities. In addition, the requirement to consider measures to accommodate needed housing growth (increasing the efficient use of lands within the UGB) prior to expanding the UGB tends to encourage jurisdictions to plan for greater densities within the existing city, which can include zoning for higher densities in areas with transit service.

#### *Policy Barriers or Conflicts*

Goal 14 and the administrative rules that implement it do not create any direct barriers for jurisdictions that choose to encourage transit-supportive housing.

#### *Gaps or Deficiencies in Policies*

As noted in the description of Goal 10, Housing (section 3.1.2), land availability and political challenges often lead jurisdictions to look to their UGB expansion areas to accommodate future housing need, and these areas, at the edge of the urban area, are often poorly served by transit.

#### *Opportunities*

To further encourage transit-supportive housing in Goal 14, the ability to serve future development with transit could be more specifically addressed and needs to be considered during the UGB expansion process, especially for primary cities within a

Metropolitan Planning Organization (MPO). Tightening the language and criteria for expansion decisions could better encourage the co-location of housing and transit.

As noted in the description of Goal 10, Housing (section 3.1.2), the passage and implementation of HBs 2001 and 2003 (discussed in sections 3.2.5 and 3.2.6, respectively) will likely present opportunities for jurisdictions to better align transit and housing and encourage the development of transit-supportive housing in the coming years. These bills may shift the ways in which jurisdictions plan for housing development (HB 2003) and housing density (HB 2001). One potential outcome that could result from either of these bills is jurisdictions planning for moderate density in current low-density areas, which could result in higher demand for transit service in these areas over time.

## 3.2 Land Use and Housing Related Policies

This section describes six statewide policies and plans relating to land use and housing, from DLCDC, ODOT and OHCS. While not part of the statewide land use planning program, these plans and programs nonetheless influence land use, housing development and transportation in various ways across the state.

### 3.2.1 Oregon's Transportation and Growth Management Program: Model Development Code

#### 3.2.1.1 Overview

Oregon's Transportation and Growth Management (TGM) Program is run jointly by DLCDC, the state agency responsible for land use management, and ODOT, the state agency responsible for managing Oregon's transportation networks. The program provides grants and technical assistance to local jurisdictions with the goal of creating thriving places with diverse transportation choices. The *Model Development Code & User's Guide for Small Cities* (the Model Code) is part of TGM's technical assistance work, offering local jurisdictions model development code language that can be adapted and used by any local jurisdiction in Oregon.

The Model Code was first published in 1999 by the TGM Program with the intent of being a comprehensive resource for cities with populations less than 10,000. The latest version of this document, Edition 3.1, was updated in 2015 to provide updated code, clearer headings and customizable graphics. Considering that small cities are often staffed by volunteers, part-time employees and a few full-time employees, this document provides a user guide for local city staff on how to incorporate model development code into their city's code. Model code language can be very helpful to cities, large and small, so they can incorporate best practices, ensure they align with legal or statutory requirements and so they do not have to spend time and resources creating code from scratch.

The Model Code does not explicitly discuss co-locating housing and transit but its implementation can help foster transit-supportive housing options.

#### *Purpose*

The Model Code is meant to help small cities in three ways: (1) help them integrate land use and transportation planning and plan for smart growth\*, (2) meet legal requirements,

and (3) provide a model code that is flexible and easy to use. The Model Code's introduction section provides the following seven guiding principles that direct cities towards smart growth:

1. **Compact Development**, which promotes the efficient provision of public services and infrastructure.
2. **Mixed-Use**, which places homes, jobs, stores, parks, and services within walking distance of one another.
3. **Full Utilization of Urban Services** (e.g., water, sewer, storm drainage, parks, and transportation facilities), which maximizes the return on public investments in infrastructure.
4. **Transportation Efficiency**, or development of an interconnected street system supporting multiple modes of transportation, which yields more direct routes (i.e., shorter distances) between local destinations, conserves energy, reduces emergency response times, and provides alternatives to the automobile for those who are unable or choose not to drive a car.
5. **Human Scale Design\***, or development in which people feel safe and comfortable walking from place to place because buildings, streetscapes, parking areas, landscaping, lighting, and other components of the built environment are designed foremost with pedestrians in mind.
6. **Environmental Health\***, which requires adequate light and air circulation, management of surface water runoff, and waste treatment and disposal.
7. **Efficient Administration of Code Requirements.**

#### *Responsible Implementing Entity*

The Model Code was created and is maintained by TGM, but it is used and implemented by Oregon cities. The use of this document is not limited to Oregon cities with populations under 10,000. Cities with more than 50,000 residents have used previous versions of the Model Code. The document's granular guidance provides steps on how to engage with the public before revising the code to ensure it reflects the community's vision.

#### 3.2.1.2 Findings

Coming from an ODOT-DLCD jointly run program, the Model Code guides small cities in creating zoning and development codes that can help them effectively manage their growth. This document is primarily focused on transportation, and while it does not explicitly discuss co-locating housing and transit, its implementation can indirectly influence housing and help foster transit-supportive housing options.

#### *Supportive Policies or Tools*

The Model Code has aspects that are supportive of creating transit-supportive housing opportunities but does not directly address the topic. Article 3 provides Community Design Standards for development and changes of use. Chapter 3.3 is on Access and Circulation, 3.5 is on Parking and Loading and 3.6 is on Public Facilities. For residential

uses, the code in Chapter 3.5 recommends cities adopt a minimum of one off-street parking space per dwelling unit in areas not served well by transit. Parking maximums are in the Model Code as a multiple of off-street parking (e.g. if one off-street parking space is the minimum required and there is on-street parking available, then 1.2 off-street parking spaces is the maximum allowed; if on-street parking is not available, then a maximum of 1.5 off-street parking spots are allowed). Parking maximums limit the auto-orientation of a given place and can have the indirect effect of promoting transit use. This chapter also provides guidance on minimum bicycle parking requirements.

Chapter 3.6 provides code for transportation facility standards, including street location and alignment, and right of way and street sections widths. This section provides definitions for arterials, collectors, and local streets, and the widths required for travel lanes, parking, and sidewalks. Additionally, this chapter requires developers to submit a Traffic Impact Analysis\* (TIA) to determine whether public facility changes are needed to mitigate potential traffic. TIAs are reports created by traffic engineers that historically focus on vehicle level of service. Modern TIAs should also discuss bicycle, pedestrian and transit facilities in its analysis to provide a comprehensive count of the current multimodal transportation system.

#### *Policy Barriers or Conflicts*

The Model Code is offered primarily through TGM's technical assistance work and jurisdictions are not required to include the specific code language outlined in the Model Code; therefore, use of the Model Code is optional.

#### *Gaps or Deficiencies in Policies*

The Model Code should include language about transit in Chapter 3.3, Access and Circulation, but it lacks this for transit and bicycle circulation. It also does not provide guidance on the modal circulations\*\* relationship to housing. In regard to housing, the Model Code does not provide guidance for code language that requires housing to be developed within close proximity to transit, but it would influence density, design standards, pedestrian friendliness, and parking standards.

#### *Opportunities*

TGM has the opportunity to encourage local jurisdictions to make use of or adopt specific code language from the Model Code. The TGM Program could accomplish this through additional policies or guidance. DLCDC could also provide additional guidance for comprehensive plan updates and UGB expansion processes.

Chapter 3.5 provides exceptions and reductions to off-street parking that cities can incorporate into their development code. This includes a consideration on whether the site has a bus stop with frequent transit located adjacent to it, or if it has a dedicated parking spot for carpool/vanpool vehicles. Depending on how cities define "frequent transit" and how widely they dedicate carpool/vanpool parking spaces, adoption of this section could support transit-oriented housing by encouraging transit use over vehicle dependency.

Chapter 5.5 provides code language on parking maximums that could also increase transit demand by reducing car ownership. This assumes that residential on-street

parking is limited, which constrains parking availability, thereby creating a travel modal switch. This opportunity's applicability might be limited for smaller cities to fully adopt since they likely lack the frequent transit necessary to sustain transit ridership.

## 3.2.2 Oregon's Transportation and Growth Management Program: Transportation Demand Management Module

### 3.2.2.1 Overview

In general, Transportation Demand Management (TDM) is a framework for local governments to encourage people to use all available TO, reducing travel by single-occupancy vehicles. TDM initiatives can be useful to combat common transportation challenges including traffic congestion, greenhouse gas emissions, parking challenges and infrastructure capacity limits. TDM policies and programs can complement mixed-use developments and help support a strong connection between housing and transit. The TGM Program published the *TDM Module* in 2013 to provide local governments with a guide on TDM programs, how to implement this program and model code language they could use. Model code language can be very helpful to cities, large and small, so they can incorporate best practices, ensure they align with legal or statutory requirements and so they do not have to spend time and resources creating code from scratch.

The guidance from the TDM Module suggests that cities adopt a TDM plan citywide, in town centers, employment cores or in designated multimodal\* mixed-use areas, and then determine which factors would trigger the need for a TDM plan, such as building use type, number of trips, number of employees, number of residential units, square footage, parking and land use approval. TDM plans can be particularly useful when specific areas or sites attract transportation users in large quantities or at peak times (e.g., an urban center, campus, stadium, or large office/housing complex).

#### *Purpose*

This document aims to assist local jurisdictions that intend to broaden their TDM efforts by incorporating programmatic TDM measures into the land use permit process. The document also outlines how to require applicants to prepare a TDM Plan that explains how they (owners and/or tenants) will achieve their goals of reducing their transportation impacts. This document is a step-by-step guide for local governments and is compatible with the Model Code.

#### *Responsible Implementing Entity*

This document was created and is maintained by TGM, but it is used and implemented by Oregon cities. The use of this document is not limited to Oregon cities with populations under 10,000. Cities with more than 50,000 residents have used previous versions of the TDM module.

### 3.2.2.2 Findings

#### *Supportive Policies or Tools*

The TDM Module can guide cities in developing strategies to mitigate the transportation impact of new construction by helping them plan and draft their development code to address common transportation challenges (such as traffic congestion or parking issues). This extends into housing development, particularly for large sites that may attract a large number of single-occupancy vehicle drivers. To avoid these transportation challenges, cities may seek to encourage the co-location of housing near existing transit or promote transit-supportive development.

#### *Policy Barriers or Conflicts*

No specific barriers or conflicts were identified within the TDM Module.

#### *Gaps or Deficiencies in Policies*

The TDM Module, like the Model Code reviewed in Section 3.2.1, does not place requirements on local jurisdictions to follow the guidance within the TDM Module. As part of TGM's technical assistance work, the TDM Module provides an accessible guide for cities seeking to integrate TDM planning into local plans and the development review processes. The TDM Module does not include a strong mechanism to require or consider TDM measures at the local level.

If a city adopts a TDM plan or policy, a potential unintended consequence could be that it acts as a constraint on development. The TDM Module does not provide cities with guidance on how to evaluate whether a TDM policy might constrain new construction. However, if a housing developer thinks that a TDM policy will disallow something that might be demanded from their potential tenants (such as ample parking), or will impact the value or revenues the property could create, they may opt not to build housing in an area impacted by a TDM policy.

Considering that a city's TDM policy provides developers with a menu of TDM strategies, this menu will inevitably be non-exhaustive. A developer or property manager is more likely to include only what is prescribed in the code in their TDM plan, thereby not seeking innovative TDM solutions.

#### *Opportunities*

TDM policies complement mixed-use development and encourage transit use. Stronger guidance for local jurisdictions to develop TDM plans or integrate TDM language into local development code could expand the application of TDM principles to more jurisdictions. Examples could include parking maximums, provisions for bike parking, orienting buildings to pedestrian or transit facilities and requirements that buildings provide travel options information or parking buy-out programs. This would complement already existing policy connections between housing and transit in many contexts.

A TDM policy would require periodic surveys of residents' transportation needs on a 3- or 5-year basis. This survey is to monitor and evaluate the property's effort to reduce trips by single occupancy vehicles\*. This accountability has the potential to encourage

residents to fulfill trips with transit. This can also provide data and trends for city planners to better understand transit and transportation needs in a given area.

### 3.2.3 Breaking New Ground: Oregon's Statewide Housing Plan

#### 3.2.3.1 Overview

OHCS is the state agency responsible for providing financial and programmatic support to ensure that Oregonians with lower and moderate incomes have access to quality affordable housing.\* In 2019, OHCS created the *Oregon Statewide Housing Plan* (SWHP) as part of a restructuring and reimagining of the agency and how it provides housing to low-income Oregonians. This involved meaningful research and data analysis into the state of housing in Oregon; a close examination of OHCS's 50+ programs and a review of the agency's program funding sources; public involvement including statewide listening tours, community engagement and public comment periods; and final adoption by OHCS's governing body, the Housing Stability Council.

The SWHP does not directly address transit but does acknowledge the importance of co-locating housing and transit to reduce the housing and transportation cost burdens faced by many low-income<sup>11</sup> Oregonians.

#### *Purpose*

The SWHP articulates the affordable housing issues facing Oregonians across the state and outlines several priorities and implementation strategies the department can take to address these issues. The plan covers a five-year period from 2019 to 2023 and includes processes for monitoring progress and updating the plan as conditions change. Because OHCS primarily focuses on housing for low-income Oregonians, the scope of the SWHP is limited to affordable housing and issues relating to housing for low-income Oregonians. While housing affordability and the development of regulated affordable housing are influenced by the wider housing market, OHCS has limited ability to affect statewide housing policy in the general market.

The SWHP outlines six actionable priorities for OHCS over this time period:

1. **Equity and Racial Justice** – Advance equity and racial justice to address disparities in housing and economic prosperity.
2. **Homelessness** – Build a coordinated and concerted statewide effort to prevent and end homelessness.
3. **Permanent Supportive Housing\*** – Invest in permanent supportive housing.
4. **Affordable Rental Housing** – Work to close the affordable rental housing gap.

---

<sup>11</sup> Low-income is a term that can have several definitions depending on the federal or state agency and is often used in evaluating program funding or eligibility for access to social services. Housing and Urban Development defines low-income as 80 percent of the median family income for a given area. The Federal Transit Administration defines a low-income individual as an individual whose family income is at or below 150 percent of the poverty line.

5. **Homeownership** – Expand homeownership for low- and moderate-income Oregonians.
6. **Rural Communities** – Unlock housing opportunities in small towns and rural communities.<sup>12</sup>

#### *Responsible Implementing Entity*

OHCS is the state agency responsible for implementing the SWHP. The policies guiding the agency will influence local jurisdictions, including counties, cities and regional governments; community-based organizations; advocates; local housing authorities; and a wide range of developers, owners, operators, funders and residents of affordable housing properties.

#### 3.2.3.2 Findings

As a housing focused document and agency, there is not a large focus on transit or transportation networks. OHCS does acknowledge the relationship between housing and transportation and routinely works with other state agencies on efforts to reduce poverty by providing low-cost housing solutions and assistance. For example, OHCS is providing support to the Joint Task Force on Addressing Racial Disparities in Home Ownership with the aim of increasing home ownership levels among underserved communities that have traditionally had less access to the housing and mortgage markets.

In many urban areas, particularly those along the I-5 corridor, many low-income households have been displaced to the edges of cities and metro areas in search of more affordable housing. While housing costs may be lower, these households may see increased transportation costs. In rural areas, low-income households routinely need to drive long distances to access employment, education or services, and this travel consumes a large share of both time and income for low-income households.

#### *Supportive Policies or Tools*

While none of the six priorities focus explicitly on transportation, many of the priorities' implementation strategies demonstrate support for TSD.

1. SWHP Priority #4, Affordable Rental Housing, suggests that OHCS align its “investments with local transportation and service investments.” This indicates OHCS' awareness and eagerness to better integrate housing and transportation statewide.
2. SWHP Priority #4, Affordable Rental Housing, also recognizes the importance of reducing the cost burden for tenants of properties it funds by providing “affordable housing in transportation-efficient locations to reduce travel time and housing and transportation cost burden.” This implementation strategy specifically emphasizes transit-oriented development and developing housing in areas near affordable TO.

---

<sup>12</sup> In the SWHP, OHCS considers a county to be rural if it is not included in a metropolitan statistical area. Using this definition, it considers the following counties to be rural: Baker, Clatsop, Coos, Crook, Curry, Douglas, Gilliam, Grant, Harney, Hood River, Jefferson, Josephine, Klamath, Lake, Lincoln, Malheur, Morrow, Sherman, Tillamook, Umatilla, Union, Wallowa, Wasco and Wheeler.

### *Policy Barriers or Conflicts*

The SWHP, its priorities and its implementation strategies do not create any direct barriers to encouraging transit-supportive housing.

### *Gaps or Deficiencies in Policies*

SWHP Priority #6, Rural Communities, acknowledges that transportation costs are higher in rural communities, particularly for low-income households, but does not have any implementation strategies relating to how the agency or the plan can help to improve this issue.

The fundamentals of affordable housing development—that development costs exceed property revenues—make the construction of affordable housing difficult in high-cost areas, such as urban areas close to transit or rural areas where development expertise, labor or materials are in shorter supply. The SWHP does not explicitly speak to this, although SWHP Priority #4, Affordable Rental Housing, has a few implementation strategies that identify the need for innovations and improved efficiency in project financing.

### *Opportunities*

As noted, a strategic action associated with SWHP Priority #4, Affordable Rental Housing, suggests that OHCS align its investments in affordable housing development and funding with investments made in transportation. In addition to signaling an awareness and eagerness to better integrate housing and transportation statewide, this provides an opportunity for OHCS staff to collaborate with policy makers at DLCD and ODOT.

## 3.2.4 State of Oregon Qualified Allocation Plan for Low Income Housing Tax Credits

### 3.2.4.1 Overview

As the agency charged with ensuring that Oregonians with lower and moderate incomes have access to quality affordable housing, OHCS serves as Oregon's housing finance agency\* and is responsible for administering Oregon's allocation of Low-Income Housing Tax Credits (LIHTC)\*. This program was created in 1986 and is run through the U.S. Internal Revenue Service (IRS) tax code. It provides a valuable source of financing for affordable housing developments. Each year, the IRS allocates LIHTCs to each state. The states then award these tax credits to affordable housing development projects, which sell them to investors as a way of offsetting a portion of the cost of developing the property. The LIHTC program is the nation's (and Oregon's) largest source of affordable housing financing and has created over three million affordable housing units since it began. It typically serves households earning less than 60 percent of an area's median income.\*

To award these tax credits to affordable housing developments, each state housing finance agency must create a Qualified Allocation Plan (QAP) that sets out the state's eligibility priorities and criteria for awarding federal tax credits to housing properties.

There are two types of LIHTCs, the nine percent credit and the four percent credit. The nine percent credit is more valuable and thus sees more affordable housing development applications competing for funding each year.

The QAP directly influences the co-location of affordable housing (financed through the LIHTC program) and transit and offers financial and competitive advantages to affordable housing development applications in “location efficient” areas.

### *Purpose*

The QAP outlines OHCS’s priorities and selection criteria for awarding funding to affordable housing developers. The QAP is updated every few years (most recently in 2019) and the process includes robust public engagement. Development projects that meet multiple priorities or selection criteria are awarded more points and are more likely to become funded and built. Thus, the priorities and selection criteria outlined in the QAP act as competitive advantages for developments.

While affordable housing is just one portion of the full housing spectrum, it is an important part of the housing stock, and locating affordable housing near transit is of growing importance to help reduce the housing and transportation cost burden and to increase access to opportunity. In addition, research has shown that low-income residents are more likely to commute by public transit.<sup>13</sup>

Because the LIHTC program is so valuable for the development of affordable housing, the priorities set forth in the QAP can have a large, direct influence on the types, locations and populations served by affordable housing developments in Oregon. This gives the QAP a direct influence over the location of a small but important share of housing in Oregon.

### *Responsible Implementing Entity*

OHCS is the entity responsible for implementing the QAP, although it must adhere to state and federal rules. The public, particularly affordable housing residents, developers, funders, owners and operators, local housing authorities, anti-poverty advocates and philanthropic or impact-investors all play a large role in helping OHCS set its QAP priorities and program rules.

## 3.2.4.2 Findings

The current QAP identifies a wide array of criteria used to score new construction or acquisition/rehabilitation\* affordable housing applications competing for the 9 percent tax credit. Project applicants that meet these criteria gain or lose points (up to 88 total).

Scoring criteria include: the target population served, the need and opportunity of the project’s location (including location efficient areas near transit), the partnerships offered by the project, funding efficiency and cost effectiveness, project readiness (including financial viability) and the project’s development team capability.

In addition to the competitive advantage that accompanies these scoring criteria, certain projects can also receive funding boosts. Federal program rules state that projects

---

<sup>13</sup> Oregon Department of Transportation. 2016. “The Case for Public Transportation: Oregon Public Transportation Plan.” Available here: [https://www.oregon.gov/ODOT/Planning/Documents/OPTP\\_201604\\_Draft\\_BusinessCase.pdf](https://www.oregon.gov/ODOT/Planning/Documents/OPTP_201604_Draft_BusinessCase.pdf)

located in areas with high poverty levels (called Qualified Census Tracts) and projects located in areas with high land or development costs (called Difficult to Develop Areas\* [DDA]) can receive funding boosts.

Beyond these Federal program rules, the Housing and Economic Recovery Act of 2008 allows OHCS to provide a funding boost to properties meeting certain criteria (OHCS QAP 2019). There are several criteria that determine which projects can receive a financial boost; those that relate to location include:

- Projects located in rural communities,
- Projects located in Transit Oriented Development\* (TOD), or
- Projects located in areas or zones “where a city or county has, through a local government initiative, encouraged or channeled growth, neighborhood preservation, redevelopment, or encouraged the development and use of public transportation.”

### *Supportive Policies or Tools*

As listed above, the QAP has several scoring criteria relating to location. Of 88 total points available for a project, location need and opportunity account for 17 points, or just under 20 percent. Location efficiency (which includes access to transit) accounts for five points and considers urban areas with walk-scores, urban areas in transit-oriented development districts or within 0.25 miles of fixed transit stops, rural areas that are not in food deserts, rural areas that have access to parks or public spaces and all areas that provide access to employment, schools, or libraries. The location efficiency points can encourage affordable housing sited in transit-rich locations.

The financial boost that OHCS can provide is also important. Taken together, the QAP is supportive of co-locating affordable housing near public transportation and public transit.

### *Policy Barriers or Conflicts*

Affordable housing projects seeking to locate near transit or other amenities may face higher costs of development, particularly land costs. Although projects can get a financial boost if they are located in a DDA, not all transit stations are located in DDAs, so some properties could face (marginally) higher land costs without the financial boost. Further, the financial boost from the DDA may be insufficient to fully overcome the higher costs.

Additionally, developers face tradeoffs in the scoring criteria when siting their affordable housing projects. Because development cost efficiency, financial viability, and location efficiency are all listed as scoring criteria in the QAP, developers of affordable housing must weigh the pros and cons of building affordable housing in areas well served by transit if these areas have higher land costs. This reduces cost efficiency and makes financial viability more difficult but provides location efficiency. These development feasibility issues make partnerships and resources between OHCS and local governments critical.

### *Gaps or Deficiencies in Policies*

The financial and scoring benefits are less clearly defined for affordable housing projects seeking nine percent credits in rural areas and do not directly tie location advantages to transit access.

### *Opportunities*

As noted, the QAP is updated every few years to respond to changing market conditions and the changing housing needs of Oregonians. This update process includes robust public engagement. With each update, there are opportunities to better integrate aspects of transit-supportive development into the scoring criteria, as well as opportunities to clarify or overcome the gaps and barriers noted above.

## 3.2.5 House Bill 2001 - More Housing Choices for Oregonians

### 3.2.5.1 Overview

The Oregon Legislature passed HB 2001 - *More Housing Choices for Oregonians* (HB 2001) in 2019 to allow the development of more diverse and affordable housing options in residential zones, including those that currently only allow detached single-family housing. Housing types like duplexes are allowed in most cities but site and design standards and other zoning requirements limit their development to certain parcels.

By June 30, 2021, HB 2001 will require medium cities with 10,000 to 25,000 residents to allow duplexes on any residentially zoned lot or parcel that allows single-family units. By June 30, 2022, it will also require large cities with more than 25,000 residents and cities in the Portland Metro region to allow duplexes, triplexes, quadplexes, cottage clusters and townhouses in all residential areas. The policy requires cities to make appropriate changes in their development standards and provide adequate infrastructure, such as water, sewer, and roads, to accommodate the development of different housing types. As a result, medium and large cities can be expected to grow in residential density, which is the number of housing units per acre.

HB 2001 does not explicitly address the co-location of housing and transit, nor does it directly support or conflict with transit-supportive development, but as cities implement these new regulations, there will certainly be interactions between new housing development, transit and public transportation needs.

### *Purpose*

HB 2001 is intended to remove barriers to developing “missing middle”\* housing types (duplexes, triplexes, quadplexes, cottage clusters and townhouses) in residential areas. It requires cities of a certain size to change their zoning code and development standards. The increased housing density and diversity of housing options are expected to make housing more affordable. The bill will expand housing options by allowing a broader selection of housing types between single-family housing and multi-unit apartment buildings. Increasing the range of housing choices will more adequately meet the needs of residents with diverse socioeconomic backgrounds and likely support densities more conducive to generating transit ridership.

### *Responsible Implementing Entity*

DLCD has led the rule making process and developed model codes for cities to adopt, but cities are responsible for the development of regulations and plans to allow missing middle housing types. DLCDC can also provide technical assistance to the cities.

### 3.2.5.2 Findings

HB 2001 is focused on allowing a wider range of housing types in more areas, with the goal of adding modestly more density in more areas across Oregon cities. In addition, missing middle types of housing are often smaller in scale and can be less expensive to buy or rent than larger scale new construction. By requiring cities to allow this type of development, more low-cost housing choices may be developed. While HB 2001 does not directly address the co-location of housing and transit or transit-supportive development, it will have indirect effects. Cities can observe new demand and supply of this type of development in their housing markets by removing regulations that limit it.

### *Supportive Policies or Tools*

In places with single-family housing and access to transit, HB 2001 encourages the development of transit-supportive housing in the form of somewhat higher-density housing and a greater range of housing options. The demand for missing middle housing likely exists already in those places, but this type of housing has not been built due to zoning restrictions.

### *Policy Barriers or Conflicts*

Allowing the development of higher-density housing in areas that traditionally have seen only or mostly single-family housing will likely result in a greater need for new transit nodes. The existing transit system is targeted at highly built areas with high residential densities not only because it boosts transit ridership but also because people with greater need for transit tend to live in areas with high residential densities. Since most places with single-family housing currently lack adequate transit access, development of missing middle housing types in those places may require a geographical expansion of transit systems.

### *Gaps or Deficiencies in Policies*

While the goal of HB 2001 is to increase housing affordability by allowing more dense housing types in places with single-family housing, it does not address the intersection between housing and transportation policies. Increased residential density—allowing more households to live closer together—will result in greater usage of the various modes of transportation that are available to these households. Without a comprehensive approach that plans for housing and transportation together, roads could become more congested and transit systems could become overburdened as housing density increases absent transit infrastructure.

### *Opportunities*

Although transit-supportive housing is not a specific goal of HB 2001, it is consistent with the bill and many state and local plans and goals. Cities and other government bodies

can prioritize transit-supportive housing through their own actions. While cities cannot limit the up-zoning\* that will result from HB 2001 to only occur near transit, they can create other incentives that will generate a greater demand for duplexes and other missing middle housing types near transit. For example, lower parking requirements and improved public spaces near transit areas will attract developers to build missing middle housing types in those areas.

### 3.2.6 House Bill 2003 – Requiring Cities to Update Housing Needs Studies and Create Housing Production Strategies

#### 3.2.6.1 Overview

The Oregon Legislature passed HB 2003 in 2019 to plan for current and future housing needs and direct cities to develop strategies to meet those needs. The law requires each city with more than 10,000 residents to update its Housing Needs Analysis (HNA) every six to eight years. An HNA's goal is to create a 20-year projection of population growth and the housing development that would be needed to accommodate that projected growth. When cities complete their HNAs, they must also adopt a Housing Production Strategy that lists specific actions they will take to promote the development of the needed housing units and types. HB 2003 also directs OHCS to conduct a Regional Housing Needs Analysis (RHNA). Unlike the current HNA process that focuses on housing needs and buildable lands in each jurisdiction, the RHNA process will create a regular assessment of housing needs and introduce the concept of a "regional need."

As jurisdictions plan for their regional share of housing need through HB 2003, there may be a greater need to increase residential land efficiency through zoning or higher-density housing, which would encourage transit-supportive development.

#### *Purpose*

HB 2003 has three aims: (1) It sets a regular schedule for certain cities to analyze their current and future housing needs. (2) It requires cities to plan for the needed housing units and types by adopting Housing Production Strategies that achieve more than accounting for a supply of buildable lands. (3) It shifts the basis of housing need from local growth projections to a share of regional housing need. As a result, there will likely be a greater number and density of residential units in places that have planned for and observed fewer developments.

#### *Responsible Implementing Entity*

DLCD is responsible for adopting a schedule for cities over 10,000 residents to update their HNAs, but cities have the ultimate responsibility for adhering to the new rules and updating their HNAs by the established schedule.

OHCS is responsible for developing the RHNA methodology and providing a technical report for public access. OHCS and DLCDC are responsible for submitting a report to the state legislature on the regional approach by March 31, 2021.

### 3.2.6.2 Findings

HB 2003 will likely cause jurisdictions to reconsider the ways they plan for housing development within their UGBs. Instead of focusing on the historical growth within their own boundaries, jurisdictions will now need to consider their share of regional housing need. This will influence the locations that jurisdictions choose to site and zone for residential use. While this effect may increase allowed densities and encourage transit-supportive development, it may also direct housing to areas that have traditionally seen low-density development, which may or may not have existing transit service.

#### *Supportive Policies or Tools*

Regular HNA updates and the results of the Housing Production Strategies\* can generate greater efforts from cities to plan for more transit-supportive housing. Accounting for current and future housing needs in each city and across a region can stimulate greater housing production in areas near transit because transit access is an important factor of higher-density development. Moreover, mixed-use developments will most likely be developed near transit if they are part of a Housing Production Strategy.

#### *Policy Barriers or Conflicts*

The regional approach to planning for housing units and types can result in a greater number of units and higher-density housing types being located in places that have traditionally experienced lower-density development. A region can contain cities that have planned for housing types and densities that work better with greater automobile access as well as cities that have planned for housing types and densities that work better with transit access. Because the regional approach would require cities to plan for housing types and densities that are more common in their neighboring cities, cities with less transit access will likely need to start planning for more transit access. Otherwise, the newly built housing types with greater residential densities may lack sufficient transit access.

#### *Gaps or Deficiencies in Policies*

A regional assessment of housing needs alone is not sufficient if cities continue to conduct localized planning processes. A framework of shared accountability and regional plans is needed to build a sufficient number and type of housing units that meet regional needs for current and future housing. Moreover, a regional approach to planning could balance the need for housing production and the benefits of transit-supportive housing.

#### *Opportunities*

HB 2003 is not intended to provide tools that explicitly direct the location of housing near existing transit systems. Instead, it may change how cities perceive housing need and will change how frequently they update their plans to address this need. This shift in perspective can be a large opportunity to affect numerous other housing and transportation planning efforts as it relates to transit-supportive housing development.

In addition, cities can prioritize transit-supportive housing through their Housing Production Strategies, which must include specific actions the city will take to address the housing needs identified in their HNA or the RHNA process. Cities that desire to

prioritize transit-supportive housing can include it in their action items, which in turn will guide their zoning and other regulatory decisions that impact this development.

DLCD recently adopted rules governing the development of Housing Production Strategies. Future changes to these rules could strengthen the relationship between transit and housing production.

## 3.3 Transportation Related Policies and Guidance

This section reviews transportation related policy and guidance documents. All the documents reviewed in this section are published by ODOT and address a variety of transportation topics including priority setting for ODOT as an organization; long range, state-level guidance on transit and travel options programs; and guidance for local jurisdictions and partners on transit plan development and the development of TSPs.

### 3.3.1 ODOT 2021-2023 Strategic Action Plan

#### 3.3.1.1 Overview

OTC and ODOT jointly developed the *Strategic Action Plan (SAP)* and are both committed to the development of a transportation system that is modern, reliable and serves all Oregonians in an efficient, environmentally responsible and safe manner. To that end, the SAP outlines a vision, defines priorities and sets goals for ODOT's near-term operations (2021 through 2023).

#### *Purpose*

The SAP includes three concurrent strategic priorities to set the plan's overall direction while identifying specific actions that lead to concrete, tangible outcomes. These priorities inform ODOT's work, guide its decision-making and provide objectives against which ODOT can be evaluated and held accountable.

The priorities are:

- **Equity** – Prioritize diversity, equity and inclusion by identifying and addressing systemic barriers to ensure all Oregonians benefit from transportation services and investments.
- **Modern Transportation System** – Build, maintain and operate a modern, multimodal transportation system to serve all Oregonians, address climate change and help Oregon communities and economies thrive.
- **Sufficient and Reliable Funding** – Seek sufficient and reliable funding to support a modern transportation system and a fiscally sound ODOT.

Nested within each priority are goals that further focus ODOT's work. While each individual goal is important, ODOT has designed the priorities and goals with their interrelationship in mind. This means, if implemented together, their cumulative value is greater than the sum of each part.

Given that the priorities and goals build upon one another, the SAP defines a modern transportation system as an equitable, future-focused and fully funded system. With the

interrelationship of the SAP priorities in mind, the SAP focuses on ten strategic outcomes to make measurable progress toward achieving the strategic priorities.

The ten strategic actions are:

1. Increase workforce diversity.
2. Implement a social equity engagement framework.
3. Reduce ODOT's carbon footprint.
4. Electrify Oregon's transportation system.
5. Improve access to active and public transportation.
6. Reduce congestion in the Portland region.
7. More dollars to Black, Indigenous, and People of Color and Women Owned businesses.
8. Implement transformative technologies.
9. Implement large-scale road usage charging.
10. Achieve sufficient funding.

To evaluate the Agency's progress and continuous improvement toward these ten strategic actions, ODOT has developed an evaluative dashboard. For each strategic action, the dashboard provides a "current status" as a baseline for comparison and objectives for each year within the plan (2021-2023). For example, relevant to the Transit and Housing Study, within the strategic action of "reduce ODOT's Carbon Footprint," an objective is to "apply greenhouse gas emission standards in making ODOT investment decisions" by 2021. ODOT states that as the SAP and ways to measure improvement evolve, the measures may change to reflect that work.

#### *Responsible Implementing Entity*

ODOT is the agency responsible for implementing the SAP, which will also provide direction for other ODOT planning efforts, such as the Transit and Housing Study, the upcoming *Oregon Transportation Plan (OTP)* and *Oregon Highway Plan* updates.

### 3.3.1.2 Findings

#### *Supportive Policies or Tools*

None of the priorities or strategic actions directly mention transit-supportive housing but several of the strategic actions provide indirect support. These include actions such as reducing Oregon's transportation carbon footprint, improving funding and access to active and public transportation and implementing road usage charges. These create incentives to reduce vehicle miles traveled and represent a collection of incentives and disincentives that provide a policy environment that better supports the use of transit.

The SAP strategic action that most clearly promotes the co-location of transit and housing is "improving funding and access to active and public transportation." Housing that is closer and more accessible to transit helps achieve this strategic action. Similarly, the "reduce our carbon footprint" strategic action includes an implementation action to

“apply GHG emission standards in making ODOT investment decisions.” This has the potential to favor the implementation and co-location of transit and housing, which could lead to lower GHG emissions.

#### *Policy Barriers or Conflicts*

The SAP does not create any direct barriers that discourage transit-supportive housing. The SAP is generally consistent with other ODOT policies and plans while focusing the agency on three key short term priorities. The process of refocusing a large organization like ODOT is inherently challenging with many moving parts and varying stakeholder interests and goals.

Large, institutional organizations have many, varied and overlapping structures that can add friction to any decision-making process and slow down implementation. Strong executive leadership and buy-in throughout the organization will be key to successful implementation of the goals within the SAP. The joint statement signed by the OTC Chair and the ODOT Director acknowledges that transformation is often a slow and challenging process.

#### *Gaps or Deficiencies in Policies*

The SAP provides few details on how implementation will achieve its vision. The brief document sets a direction and specific actions. ODOT will adjust its policies, programs and procedures to better implement the SAP. The document functions as an outline, with many of the first implementing tasks to complete detailed plans for achieving the established goals and priorities.

#### *Opportunities*

Implementation of the SAP presents an opportunity to examine ODOT programs and project work to assess how transit-supportive housing can fit into the goals and priorities outlined in the action plan. ODOT is already examining how it delivers programs and project work. Goals involving community engagement, carbon emissions reduction and improving access to active and public transportation all provide opportunities to implement policies that would address transit-supportive housing.

## 3.3.2 ODOT Transportation System Plan Guidelines

### 3.3.2.1 Overview

The *Transportation System Plan (TSP) Guidelines* provide a reference for local and regional partners that are required to create or update a TSP, as well as the consultants that may assist them. Thus, the *TSP Guidelines* are not policies but a reference document for how local jurisdictions apply state policies stemming from the TPR. TSPs describe the current transportation system and outline the projects, programs and policies for multiple modes that are necessary to fulfill long range needs (typically 20 years) and serve as the transportation element of a community’s comprehensive plan. The Statewide Transportation Planning Goal requires most Oregon jurisdictions to adopt a TSP. The *TSP Guidelines* provide information that define a TSP, the regulatory requirements of TSP documents and the steps involved in the TSP planning process. It is thus a document that offers both broad and detailed guidance meant for jurisdictions

that must undertake a TSP process. With the exception of cities with fewer than 10,000 residents, counties with fewer than 25,000 residents and unincorporated portions of counties within UGBs with fewer than 10,000 residents, all Oregon communities must prepare and adopt a TSP.

### *Purpose*

The *TSP Guidelines* serve two primary purposes: (1) provide local and regional jurisdictions guidance for implementing Oregon's Transportation Planning Goal (Goal 12) through the TSP planning process and (2) as a reference or user's manual for the TSP process with step-by-step instructions for all phases of a TSP development process with specific references to the administrative rules that must be fulfilled at each step. This guidance describes the minimum required elements that must be included within a TSP.

TSP development phases typically include:

1. **Agency and Public Engagement** – A key step in plan development is the coordination and establishment of advisory committees and a public engagement approach.
2. **Goals and Objectives** – One of the initial steps in the development of a TSP is to identify and validate the goals and objectives that support the desires and vision the community has for the existing and future transportation system.
3. **Existing Conditions** – The existing conditions phase includes a review of plans and policies currently in place that shape local transportation infrastructure along with an inventory and assessment of the existing multimodal transportation network.
4. **Future Conditions** – Following the existing conditions assessment, the future multimodal demands and needs are identified including identifying individual projects or programs for consideration.
5. **Solution Development and Evaluation** – This phase includes the development of evaluation criteria and prioritizing projects.
6. **Funding Program** – During this phase, the available funding over the plan's lifespan is analyzed and matched to the identified projects and programs and a final list of funded projects and programs is created.
7. **Documentation** – During the final phase of a TSP, all the previous phases are documented and summarized into a final plan that meets the regulatory requirements for TSP content defined in OAR 660-012 and its subsections.

### *Responsible Implementing Entity*

ODOT is responsible for maintaining and updating the *TSP Guidelines*. Local jurisdictions, cities, counties and tribal governments are required to develop TSP documents. Local jurisdictions are responsible for making sure they comply with the guidelines and relevant administrative rule requirements. Upon completion of a TSP, DLCDC performs a review and provides acknowledgement of the TSP. TGM and ODOT regions fund TSP updates and their staff are also generally involved in an advisory and coordination role throughout the TSP process.

### 3.3.2.2 Findings

#### *Supportive Policies or Tools*

The *TSP Guidelines* do not contain requirements that explicitly support transit-supportive housing or development. The document is primarily a process and best practices guide for developing TSPs and it acknowledges the role of land use and density in planning multimodal transportation networks.

None of the policy guidance directly mentions transit-supportive housing. Several guidelines for the development of TSPs can be construed as supporting transit-supportive policies if combined with appropriately supportive policies at the regional or state level. All TSP documents must be consistent with OTP and the subsequent mode specific plans such as the OTP and OTOP, which are reviewed in sections 3.3.3 and 3.3.4, respectively. Furthermore, if a jurisdiction is part of a regional MPO, a TSP must be consistent with any Regional Transportation Plan (RTP) policies. As a result, transit-supportive policies within state and MPO plans would flow down to a local TSP. For example, if Metro, the regional MPO for the Portland metro area, established mode share targets within the adopted RTP, these mode share targets would extend to the TSPs of local jurisdictions within Metro's purview.

#### *Policy Barriers or Conflicts*

The *TSP Guidelines* offer a user's manual for local jurisdictions updating TSP documents and applying state policies related to the TPR. The Guidelines for the Future Conditions section outline how local jurisdictions identify transportation deficiencies. Potential solutions are then developed and evaluated based on the identified deficiencies. However, deficiencies are primarily determined by identifying capacity constraints based on future travel demand or facilities that do not meet adopted standards on the transportation network.

Analysis includes all transportation modes, but the capacity concept is most strongly tied to traffic operations in current policy. Using the concept of motor vehicle capacity as the primary measure can lead toward more auto-oriented solutions. A potential result of this focus is to prioritize solutions that create a built environment potentially less conducive to seamless housing and transit linkages (e.g., wider roadways that bifurcate neighborhoods and create real or perceived multi-modal connectivity barriers).

ODOT also provides guidance for evaluating multimodal solutions in the *TSP Guidelines*. For example, roadway solutions shall address existing or potential capacity issues along roadway segments and intersections, while pedestrian solutions shall address known safety issues and gaps in the walkway network.

#### *Gaps or Deficiencies in Policies*

The *TSP Guidelines* reflect state policies and offer jurisdictions the flexibility to develop additional, optional evaluation criteria and performance measures beyond motor vehicle capacity when determining deficiencies, needs and allocation of funding. Capacity improvements may include pedestrian, bicycle and transit enhancements that do not necessarily impact roadway capacity. For example, transit evaluations require only a qualitative analysis of a jurisdiction's transit network in the Existing Needs Determination

phase of a TSP process, followed by an analysis of projected future needs against locally adopted performance measures. Performance measures designed to reinforce transit-supportive development are thus left to locally adopted goals and priorities.

*TSP Guidelines* for project evaluation do not limit the types of evaluation metrics used at later stages of project development. A corridor project may involve a more detailed examination of active transportation and transit facilities beyond what is outlined in the TSP as the project progresses into the design and implementation phases. The open-ended nature of the optional measures is partially to acknowledge that communities of differing sizes and geographies have varying needs. Not all communities are served by transit and have less need to perform an analysis for transit. However, outlining more specific transit evaluation measures, reexamining when measures are required versus optional and ensuring coordination between TSP and transit planning processes could result in an increased focus on transit and transit-supportive projects. Transit planning guidance does not specifically endorse land-use-based evaluation measures beyond a simple summary of land use and development pattern information. Improving transit related initiatives within TSP documents is an ongoing area of improvement. Without more developed transit related evaluation and performance measure guidance, some local jurisdictions may not fully consider transit within their TSP. This can be a missed opportunity for jurisdictions to identify transit coverage that is accessible to existing or future housing.

Land use policies or tools represent another optional set of solutions that could be evaluated for metropolitan areas of one million people or greater, essentially limiting their scope to the Portland metropolitan area. All TSP documents, regardless of community size, consider population and employment growth. Growth assumptions are partly based on local zoning ordinances and designations to determine where growth will occur. The *TSP Guidelines* offer a handful of tools the Portland metropolitan area could consider, such as increased minimum densities, changing land use designations and infill and redevelopment policies.

This guidance is predicated on ODOT's authority within transportation; therefore, less guidance is given on land use tools as a possible solution to address transportation deficiencies and meet future needs. Transportation infrastructure is thus used as a solution to facilitate connections between land uses and accommodate population growth, but land use policies and tools are largely not used as solutions to facilitate transportation choices. Land use solutions, such as reductions in parking maximums, changes to densities and mixed-use districts, would necessarily involve coordination with DLCDC to enact before they can be integrated into the *TSP Guidelines*.

TSP guidance also covers possible TDM tools as a means to manage travel demand while reducing capacity expansion needs. TDM tools include real-time traveler information, bikeshare programs and parking management programs. Expanding the list of possible TDM tools while also expanding the communities that should address the use of such tools in their TSP would lead to a broader application of transit-supportive policies.

### *Opportunities*

Transit-supportive development is mixed-use and pedestrian-friendly with easy access to transit within a quarter- to half-mile distance. Policies that support alternative evaluation

criteria, and not specifically built around the concept of motor vehicle capacity or tailored to transit-supportive housing or TOD principles, could help local jurisdictions develop transportation solutions that offer more support to these development types. Furthermore, TSP guidance to allow land-use-based solutions meant to address identified transportation deficiencies could be developed, and requirements for such solutions could be applied to a broader set of Oregon communities outside of the Portland metropolitan area. Such tools could include increases to allowable densities, allowing mixed-use districts, encouraging infill development and removing parking requirements.

A possible avenue to achieve this is through the adoption of state policies offering support for transit-supportive housing and guidance on evaluation and performance measures for transportation projects and programs. Local TSP documents must be consistent with state and regional policies and plans. This provision provides an opportunity for ODOT to implement state-level policies that would then filter down to associated supportive policies in local TSP documents and be implemented at the local level.

### 3.3.3 Oregon Transportation Options Plan

#### 3.3.3.1 Overview

The *Oregon Transportation Options Plan* (OTOP) is a topic plan serving as a component of the broader OTP. OTOP thus serves to refine and apply OTP policies specifically to the topic of transportation options (TO). TO are defined as having choices between transportation modes, allowing people to bike, walk, take transit, drive, rideshare and telecommute. The term “TO” is broadly interchangeable with the term “TDM.”

##### *Purpose*

The OTOP’s purpose is to establish a vision that supports and delivers TO across Oregon. This is accomplished by policy guidance that advances TO programs and suggests ways to integrate TO into planning and investment activities. The plan also provides a policy framework that local and regional partners must be consistent with when updating regional and local transportation plans.

##### *Responsible Implementing Entity*

The OTOP is implemented at both the state and local level. At the state level, the plan guides ODOT’s TO Program, which focuses on administering grants, coordinating with local partners on TO programs and administering the congestion mitigation program for ODOT related construction projects. At the local level a multitude of implementing partners are relied upon including cities, counties, MPOs, school districts, transit providers, Transportation Management Associations (TMA) and private sector employers. These local partners are involved in several ways, including implementing programs such as Safe Routes to School, employer outreach efforts, or setting TDM requirements for new developments through a development review process.

### 3.3.3.2 Findings

#### *Supportive Policies or Tools*

The OTOP is a plan that aims to expand access to TO across the state and contains many policies and actions that are broadly supportive of transit-supportive housing. The OTOP is a resource for policy solutions and actions that, when applied at the state, regional and local level, can promote transit-supportive housing and land uses. TDM and TO policies, when paired with transit-supportive development policies and design standards, can enhance the effectiveness and strengthen the outcomes of transit-supportive development.

Policies and strategies that specifically support housing and transit include:

- **5.h** – Include transportation options as a mitigation strategy in developer agreements for a range of projects.
- **6.3** – Use transportation options to help achieve local, regional, state and federal environmental and public health goals to reduce vehicle miles traveled, reduce GHG emissions, improve air quality and reduce obesity and associated chronic diseases due to lack of physical activity.
- **6.b** – Integrate health consideration and impacts in transportation planning. Include transportation options outcomes in Community Health Improvement Plans / Community Health Needs Assessments. Where detailed health impact assessments are not practical, consider elements of public health in transportation and community planning and in site design.
- **7.2** – Encourage the incorporation of multimodal level of service\* or similar multimodal and person movement measures and analysis tools during TSP updates.
- **7.4** – Expand the role of parking management and coordinated site planning in community planning and design, recognizing the full costs and outcomes associated with inefficient parking strategies.
- **7.c** – Pair mixed-use development with expansion of transit, walking and bicycle networks to facilitate availability of transportation options.
- **7.d** – Support the development of complete “20-minute”\* neighborhoods (neighborhoods that contain jobs, housing and services that are accessible by a 20-minute walk, bike ride or transit ride).
- **7.g** – Update local zoning codes to reduce requirements for off-street parking and establishing off-street parking supply maximums in urban areas, as appropriate. Many policies addressing health and equity, and related performance measures and outcomes, provide indirect support for the integration of housing and transit service.
- **9.d** – Create financial incentives for communities that coordinate human service delivery with transit and transportation options providers to improve efficiency of operation, user experience and access to destinations.

### *Policy Barriers or Conflicts*

One barrier within the OTOP involves policies and strategies focusing on planning, promoting and building park-and-ride sites to support transit service in suburban settings. For example, Strategy 4.g calls for “establishing partnerships with local jurisdictions and the private sector to site and manage new park-and-ride facilities.”

Park-and-ride locations, which in practice are transit stops surrounded by parking, preclude the development of the area using TOD principles. The tradeoff is between co-locating housing or other land use types and providing parking for personal vehicles. One provides easy access to transit, pedestrian friendly, compact, mixed-use development while the other encourages SOV trips, dispersed and low-density land uses and under-utilizes the land around a transit stop. Park-and-rides do help connect riders to transit, but providing other policies that support TOD or transit-supportive housing alongside park-and-ride policies could offer a better balance of options for local jurisdictions and transit providers.

### *Gaps or Deficiencies in Policies*

The OTOP includes many wide-ranging policies and strategies that promote, either directly or indirectly, the integration of housing and transit. However, many gaps remain within the plan, mainly around the issues of mechanisms for implementation, coordination and accountability for achieving goals. ODOT’s TO Program is primarily responsible for overseeing the plan’s implementation. This program is relatively small, which can affect the overall success of the OTOP. Furthermore, many of the policies require a high degree of coordination across many different ODOT divisions. This includes local and regional partners such as TMAs or school districts and possibly DLCD regarding land use policies. This places a heavy reliance on ODOT partners to implement and follow through with actions identified in the OTOP. Offering clearer tools for coordination and resources for local implementation partners could help the plan succeed in meeting its stated goals.

### *Opportunities*

The OTOP features several policies that either directly or indirectly support transit-supportive housing. OTOP provides policies that, if more broadly adopted within other state-level transportation plans, could create a more robust framework for connecting land use and transportation investments in the work ODOT pursues and that of its local partners. Policy examples include the development and incorporation of multimodal level of service and multimodal trip rates as tools for transportation planning and project design evaluations, identification and development of mobility hubs\*, support and expansion of bike share programs and support and adoption of a complete 20-minute neighborhood policy at the state level.

## 3.3.4 Oregon Public Transportation Plan

### 3.3.4.1 Overview

The *Oregon Public Transportation Plan* (OPTP) is a statewide policy plan that supports and guides state, regional and local decision-making. The plan describes the vision for the public transportation system, goals and comprehensive policies and strategies to

support operations of and investments in public transportation statewide. Along with the OTP and other modal plans, the OPTP fulfills state and federal planning requirements.

#### *Purpose*

The OPTP is broad in scope, including policies and strategies that address the full range of public transportation services and how they relate to other mobility services, such as transportation network companies (e.g. Uber, Lyft, etc.), carsharing and bike sharing. The OPTP is intended to provide a policy foundation for the dozens of public transportation providers in Oregon, supporting and guiding their work to deliver services. The OPTP also provides policy supporting the many public bodies that can participate in enabling public transportation services, such as state agencies, land use authorities, MPOs, tribes and others. A key focus of the plan is fostering increased coordination and collaboration among providers and local agencies to improve the system and ensure public transportation decision-making involves all partners.

#### *Responsible Implementing Entity*

As a statewide policy plan, the OPTP has a direct influence on ODOT's policies, programs, and investments. It helps guide transit funding program priorities, including funding distributed from the STIF formula and discretionary programs. It also influences state investments in the transportation system more broadly.

The OPTP provides policy support, strategies and a vision that form the foundation of public transportation policymaking and investments for local agencies and public transportation providers. As the main providers of transit service, regional and local agencies are primary implementers of the vision, goals and policies of the plan, while state and local government partners are very important to support and enable plan implementation.

### 3.3.4.2 Findings

#### *Supportive Policies or Tools*

The OPTP expressly recognizes the link between transit and housing, noting public transportation's essential role in housing outcomes and household costs. Goal 8 of the plan specifically addresses land use and offers broad strategies for how land use and transit can be better connected through planning efforts, incentives, funding and coordination with local partners. ODOT has developed resources, including the OPTP Practitioners Guides, to help ODOT staff, transit providers and local planning practitioners better implement OPTP policies and strategies. Additionally, Volume 2 of the OPTP includes a white paper outlining opportunities and barriers to better integrating land use and transportation.

The OPTP provides policy guidance that addresses affordable housing and transit access. Lower income households typically use transit at a higher rate compared with other income groups. A key trend noted by the plan is increasing housing prices that push people to the edge of urban areas. Lower income individuals, or individuals who do not have easy access to a personal vehicle and may live in locations without convenient and safe TO, may be disproportionately affected by this trend, thereby reducing access to public transportation and making transit trips less convenient. This trend of rising housing

costs is strongest in the Portland Metro area and in cities that have attracted a strong tourism base such as Bend, Ashland or select coastal communities.

Individuals and groups that do not have easy access to a personal vehicle rely more heavily on public transportation to participate fully in society. This means communities that are designed to foster affordable housing and transit connections are becoming more important as housing prices increase and the population ages. Strategies and policies that address housing and transit specifically include:

- **Strategy 4.3** – Identify disparities, barriers, and needs that impact people’s ability to access and use public transportation. This includes “affordable housing” as a key consideration in determining areas underserved by public transportation.
- **Strategy 8.1** – Increase the use of public transportation by fully integrating public transportation with other community plans including transportation, land use and economic development plans. This encourages the integration of housing plans with public transportation planning.
- **Policy 8.3** – Foster the development of housing near public transportation routes and services. This includes attendant strategies for collaborating with public housing providers and promoting TOD and mixed-use housing near public transportation.

Strategy 8.1, fully integrating public transportation with other community planning efforts, is a key initiative that ODOT is implementing throughout many programs and partnerships. ODOT is focusing on coordinating planning activities with local partners and across state-level efforts so that transit systems become more integrated across transit providers. The goal is to create an effective, efficient and seamless transit system through integrated planning activities. To achieve this, ODOT is encouraging transit providers to coordinate more, participate in planning efforts together and coordinate services between providers.

Other goal and policy areas, including equity and public health, also indirectly address the nexus between housing and transit. For example, the “health” goal considers strategies for fostering walking and cycling connections to transit that implicitly rely on co-locating housing and transit.

#### *Policy Barriers or Conflicts*

There are no policies or strategies in the OPTP that hinder or work against the connection between transit and housing.

#### *Gaps or Deficiencies in Policies*

The OPTP includes a wide range of policies and strategies, some of which directly and indirectly address housing. It generally supports fostering greater connections between transit and housing. As a statewide plan, there are many different goals in the OPTP that would be addressed by many different agencies and groups, all of which require resources to implement. Housing is one area of focus among many potentially competing (but not conflicting) goal areas.

### *Opportunities*

The OPTP contains many policies and strategies that can foster improved connections between transit and housing. The plan offers ten goal areas across many subjects, including equity, health, safety and security and environmental sustainability. With many goal areas, no one goal takes precedence over the others. Prioritizing the actions and strategies already outlined for land use, transit and housing within the OPTP could help focus ODOT's role in supporting transit-supportive housing practices at both the state and local level.

## 3.3.5 ODOT Transit Development Plan Guidebook

### 3.3.5.1 Overview

The *Transit Development Plan (TDP) Guidebook* was created to support Oregon's transit providers in preparing TDPs. As a guidebook, it does not set policy but does provide structure and minimum expectations for transit planning across the state. Transit providers are not required to adopt a TDP when planning their transit network and service, but many Oregon transit providers do follow TDP guidelines.

At a minimum, TDPs should do the following:

- Identify and prioritize public transit investments.
- Assess the potential for transit (and investments in transit) to support a range of community and regional goals (e.g., promoting economic development and tourism).
- Establish a goal-based framework for identifying transit needs and improvement options.
- Explore alternatives for addressing transit needs objectively and transparently.
- Identify opportunities to improve connectivity between transit stops, other transportation modes, multiple transit providers and riders' origins and destinations (local and regional).
- Link to performance measures and targets.
- Include a financially constrained plan for transit improvements.
- Provide the basis for the transit element of a community's TSP.

### *Purpose*

TDPs express transit provider goals and identify needs and strategies to achieve them over a 20-year horizon or other specified time frame. A TDP is also an opportunity to inform and help integrate transit needs into TSP updates and other planning processes. The guidebook provides best practices and recommendations for preparing TDPs.

### *Responsible Implementing Entity*

The guidebook is intended to benefit transit provider staff from multiple departments, ODOT staff, local government staff and decision-makers, regional agency staff and

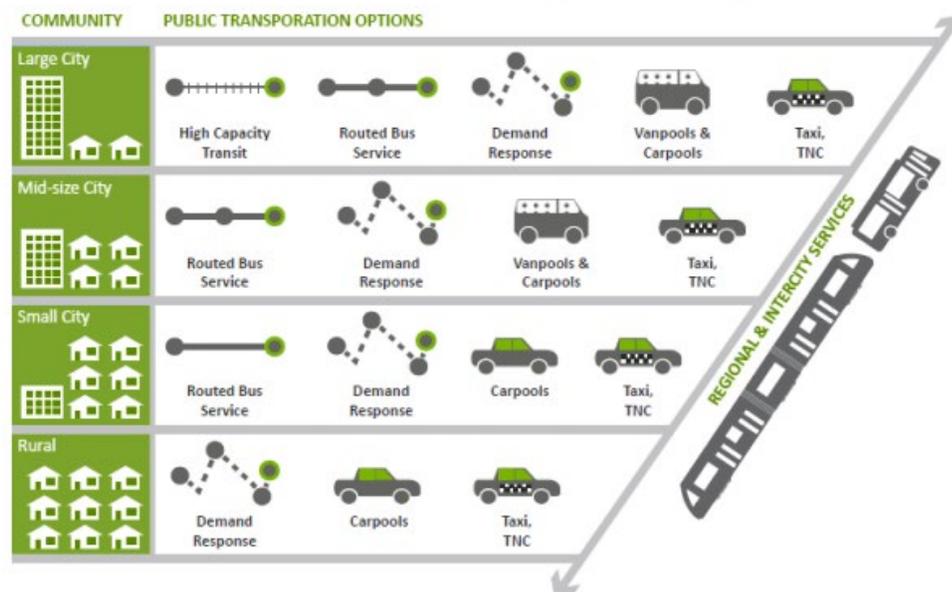
decision-makers and members of the community who are invested in the success of the transit system.

### 3.3.5.2 Findings

#### *Supportive Policies or Tools*

The TDP Guidebook recognizes the link between increasing housing density and expanding transit service. In Chapter 2 (Getting Started), Table 2-1 outlines transit-supportive density thresholds that demonstrate the urban density needed to expand the range of transit options available in a community, from rural demand response services (~4 households [HH] per acre) up to high-capacity urban transit (~6-8 HH per acre plus employment with 40 jobs/acre). Figure 2-1 (from the TDP Guidebook) shows a similar link, expanding options as urban density increases.

**FIGURE 2-1 - TRANSIT SERVICES IN CONTEXT (ILLUSTRATIVE)**



*Note: In this figure, TNC = transportation network company.*

Chapter 2 of the TDP connects TDP documents and transit planning to other community plans—including comprehensive plans and housing plans. A TDP influences, and is influenced by, other plans in the community. Transit system planning should be attuned to growth patterns and planned growth areas to best serve future riders.

TDPs should further the goals of the OPTP, which recognizes the link between transit and housing in several ways.

In Chapter 6 (Baseline Conditions), the TDP Guidebook recommends specific analysis methods for determining transit service needs. Examples include mapping areas of population density with current transit service lines and stops to identify gaps; mapping low-income population density; and mapping existing and future activity centers, schools, recreation facilities, hospitals and retail centers.

### *Policy Barriers or Conflicts*

There are no policies or strategies in the TDP Guidebook that hinder or work against the connection between transit and housing.

### *Gaps or Deficiencies in Policies*

The TDP Guidebook could add recommendations for how transit agencies can incorporate TOD planning into their work for communities where TOD demand exists. As housing development often follows transit investment, the TDP guidelines could be strengthened by advising transit agencies on how to engage in a more dynamic and iterative way with developers and land use/housing planning while both are in the planning stages. The TDP could also provide more guidance for the coordination of transit and housing policy and plans in communities more broadly, not just those where TOD is possible.

Transit providers, depending on their funding capabilities and service mission, have an incentive to provide efficient service. Efficient service provides many benefits including easier to understand routes, more direct and higher quality routes and improved public perception. The more passengers per vehicle mile or vehicle hour a transit provider can serve, the more operating expenses are recouped through farebox receipts. This would lower the need for transit subsidies through federal, state or local funding measures. This is most relevant in metropolitan areas, where population density can support high ridership service on some routes. Service providers in smaller communities may tend to focus more on service coverage. All transit providers seek the balance of high ridership and broad service coverage that suits the community they serve and typically enables some farebox revenue.

### *Opportunities*

The TDP Guidebook acts as a manual that local transit providers can follow when developing their transit plans. Because of this, the Guidebook already offers many suggested minimum standards, transit planning methodologies and quantitative evaluation tools. The TDP Guidebook could be amended with additional guidance specifically targeted at the issue of transit-supportive housing and how the issue can be addressed within a local transit planning context.

## 3.3.6 Statewide Transportation Improvement Fund

### 3.3.6.1 Overview

The Statewide Transportation Improvement Fund (STIF) is a funding program for projects that improve or expand access to public transportation throughout Oregon. The STIF program is just one of many transit focused funding programs managed by ODOT's PTD. The PTD is responsible for managing and distributing federal and state dollars to transit providers, such as FTA Section 5304 grant funds. The STIF program was passed as part of HB 2017 and is managed by ODOT's PTD with oversight by OTC. 2019 was the first year of programmatic funding with \$224 million in Formula Funds and \$18 million in Discretionary Grant Funding.

The STIF program review includes the rules governing funding eligibility and guidance on applying for both the Formula Funds and Discretionary Grant Funds along with OAR 732-040-0005, which governs the program administration.

### *Purpose*

The intent of the funding is to improve access to jobs, improve mobility, relieve congestion and reduce GHG emissions through expanded access to transit. The funding is not intended to replace local sources, but rather to help improve and expand transit service. The program operates through several elements including:

- **Formula Funding** – 90 percent of STIF funds are allocated and distributed to qualified entities based on taxes paid within their geographic area, with the minimum amount of \$100,000 per year of revenue generated for each qualified entity. This allocation is non-discretionary and may be used to maintain existing service, create new service or plan for the development of future transit service.
- **Discretionary Funding** – Five percent of STIF funds are awarded to transit providers based on competitive grants. Projects eligible for discretionary funds include, but are not limited to, capital projects, mobility management, planning, research and pilot project operations.
- **Discretionary Intercommunity Funding** – Four percent of STIF funds are awarded to transit providers based on competitive grants to either enhance connections within or between two or more communities. Projects eligible for intercommunity funds include, but are not limited to, capital projects, mobility management, planning research, pilot projects and ongoing operations.
- **Technical Resource Center** – ODOT allocates one percent of STIF funds to create statewide resources to assist public transportation providers in rural areas with training, planning and information technology assistance.

Eligibility criteria and reporting requirements differ between the formula and discretionary funds. For Formula Funds, a qualified entity must submit a STIF Plan including information on intended uses for STIF funds, projects that exist in at least one local plan, an explanation and analysis of how communities with a high percentage of low-income household are identified and how the expenditure of funds will expand or improve service to low-income households.

For Discretionary Grant Funds, ODOT developed an evaluation scoring framework. The scoring criteria is shown below in Figure 3-1, taken from the STIF Discretionary and Statewide Transit Network Program Guidance and Grant Application Instructions.<sup>14</sup> The three most significant scoring criteria for STIF Discretionary Grant Funds include 25 percent for safety and security, 20 percent for funding sustainability and 20 percent for improving or expanding service to low-income households. Intercommunity funds are scored slightly differently, with the two most significant scoring criteria including 30 percent for improved coordination between transit providers and 30 percent for improvements or expansion of service between communities.

---

<sup>14</sup> <https://www.oregon.gov/ODOT/RPTD/RPTD%20Committee%20Meeting%20Documents/STIF-Discretionary-STN-Solicitation-Guidance.pdf>

Figure 3-1. STIF Discretionary and Intercommunity Funding Criteria<sup>15</sup>

Focus Areas	Evaluation Criteria	Score Weighting	
		STIF Disc.	STN
<b>Equity and Public Transportation Service to Low-income Households</b> <i>OPTP goal:</i> <ul style="list-style-type: none"> <li>Equity</li> </ul>	<ul style="list-style-type: none"> <li>Improves public transportation service (e.g., service levels, programs, information, and supporting infrastructure) to low-income households. OAR 732-044-0030(1)(a)</li> <li>Improves or expands service to vulnerable or transportation-disadvantaged populations (e.g. seniors, people with disabilities). OAR 732-044-0030(1)(c)</li> </ul>	20%	10%
<b>Coordination of Public Transportation Services</b> <i>OPTP goal:</i> <ul style="list-style-type: none"> <li>Communication, Collaboration, &amp; Coordination</li> </ul>	<ul style="list-style-type: none"> <li>Improves coordination between public transportation providers and reduces fragmentation of public transportation services. OAR 732-044-0030(1)(b)</li> <li>Provides integrated planning where affected communities will plan or partner to develop public transportation project(s). OAR 732-044-0030(1)(c)(A)</li> </ul>	10%	30%
<b>Statewide Transit Network Connections</b> <i>OPTP goals</i> <ul style="list-style-type: none"> <li>Mobility &amp; Public Transportation User Experience</li> <li>Accessibility and Connectivity</li> </ul>	<ul style="list-style-type: none"> <li>Improves or maintains service between geographically separated communities. OAR 732-044-0030(1)(c)(D)</li> <li>Implements technological innovations that improve efficiencies and supports a seamless, easy-to-use Statewide Transit Network. OAR 732-044-0030(1)(c)(B)</li> <li>Improves local connections and infrastructure at inter-regional transit hubs or develops service improvements and approaches that can be replicated statewide. OAR 732-044-0030(1)(c)</li> </ul>	10%	30%
<b>Environmental and Public Health</b> <i>OPTP goals</i> <ul style="list-style-type: none"> <li>Environmental Sustainability</li> <li>Health</li> </ul>	<ul style="list-style-type: none"> <li>Reduces greenhouse gas emissions in or through public transportation systems. OAR 732-044-0030(1)(c)(C)</li> <li>Supports positive health outcomes. OAR 732-044-0030(1)(c)</li> </ul>	15%	10%
<b>Sustainable Funding</b> <i>OPTP goal</i> <ul style="list-style-type: none"> <li>Funding and Strategic Investment</li> </ul>	<ul style="list-style-type: none"> <li>Does not substantially rely on discretionary state funding beyond a pilot phase (i.e. project is short-term or has reasonable fund sources identified to sustain project-related transit services after discretionary funds expended). OAR 732-044-0030(1)(d)</li> </ul>	20%	10%
<b>Safety, Security, and Community Livability</b> <i>OPTP goals</i> <ul style="list-style-type: none"> <li>Safety and security</li> <li>Community livability and economic vitality</li> </ul>	<ul style="list-style-type: none"> <li>Protects fleet condition and ensures vehicles are maintained in a state of good repair. OAR 732-044-0030(1)(c)</li> <li>Results in increased use and participation in active transportation, including public transportation. OAR 732-044-0030(1)(c)</li> </ul>	25%	10%

STIF Disc.: STIF Discretionary Fund

STN: Statewide Transit Network Program

### *Responsible Implementing Entity*

There are three primary implementing entities:

- ODOT’s PTD manages the STIF program and is responsible for administering allocation and distribution of funds to service providers as well as running the technical resource center. STIF funded projects are identified at the local level,

<sup>15</sup> Ibid, Table 1: 2018 Discretionary Solicitation Evaluation Criteria Framework

often through local TSP or transit service plans. In this role, the PTD is responsible for establishing rules and publishing guidance for transit providers applying for both the Formula Funds and available grants. PTD also administers the project selection process for STIF Discretionary Grant Funds.

- The OTC provides oversight of the funding program while also establishing and maintaining the administrative rules that guide the program and set the funding priorities.
- Local and regional transit service providers, including transit districts, counties and federally recognized tribes, receive and spend funding at the local level.

### 3.3.6.2 Findings

#### *Supportive Policies or Tools*

The STIF program guidance on eligible projects and the selection criteria does not directly address the issues of transit-supportive land uses or housing. The STIF program is designed to expand and improve transit service throughout Oregon and to support transit by making more funds available for both capital and operating expenses. Many of the program's goals target the delivery of transit service to previously underserved areas and populations or between communities that previously lacked a transit connection. This primary goal can support the connection between transit and housing by expanding service to more neighborhoods in communities that receive STIF funds. Eligible expenses include capital costs of transit vehicles, mobility hubs and overarching operating expenses for both expanded service and increased frequencies. STIF funds can also be used to improve first-mile/last-mile (FMLM) connections—the beginning or end of a trip made by transit—when the transit nexus is clear and reasonable.

STIF funding may come with restrictive covenants that can complement transit-supportive housing. ODOT's PTD uses restrictive covenants on certain properties adjacent to transit capital investments. The covenants protect the long-term viability of transit investments, ensuring that development adjacent to these investments does not interfere with the core intended transit use. Depending on the wording of the covenants and the context of the transit investment, these can help support transit adjacent developments such as TODs.

#### *Policy Barriers or Conflicts*

There are no policy or funding criteria within the STIF program that hinder or work against the connection between transit and housing.

#### *Gaps or Deficiencies in Policies*

The STIF program is meant to expand or improve transit service in low-income areas or between communities where transit service may be lacking. The location of low-income populations within a community can influence where transit service is provided via STIF program funding. If low income areas exist in suburban areas or the suburban fringe, transit providers may face challenges in providing continued transit service to these areas due to low densities and the dispersed nature or destinations.

STIF Discretionary Grant Funds are scored according to several criteria from the OPTP and are based on the ten goals within that plan. Goal 8 pertains specifically to land use. For example, under the land use goal, Policy 8.1 encourages full integration of public transportation, transportation, land use, housing and economic development plans. However, the land use goal is not one of the criteria used to score Discretionary Grant Funds.

Creating a scoring criterion related to land use could help meet the goal of more fully integrating land use and public transportation planning. Adding land use related criteria, such as a location efficiency or accessibility evaluation measures, could help accomplish the goals of Policy 8.1. These measures could be added to the Formula Funds requirements for STIF Plans while Discretionary Grant Fund requirements could add to the scoring criteria.

Land use is a factor considered during local comprehensive plan and TSP document updates. STIF funded projects are often selected from a list of projects identified in a TSP or another adopted local plan. As a result, they reflect land use planning inputs at a project's initial conception. Any land use evaluation measures would need to be carefully balanced with the primary objective of the funding program.

### *Opportunities*

Adding additional criteria for evaluating eligible funding projects that relate to location efficiency or land use could direct funds to transit that better serves land uses and housing that is already transit supportive. However, given the primary purpose of the STIF program to expand and improve service to underserved locations and communities, any additional evaluation criteria would have to be carefully balanced so that the primary mission is not adversely affected.

## 4 Conclusions

The nexus between housing and public transportation is complex, with many layers and potential factors that must be considered by state and local policy makers. The State has only certain tools at its disposal to influence the co-location of housing and transportation investments, such as transportation policy and investment criteria, while many of these decisions are evaluated and made at the local or regional level. The State more often plays the role of setting the policy framework or publishing guidance that local partners must follow, or at least consider, when making housing and transportation planning decisions.

Despite the complex nature of these issues, deliberate coordination among the various levels of government and across state agencies could lead to improved outcomes in coordinating planning decisions around the co-location of housing and transit investments. Further, if the State were to establish greater cross-agency coordination, this could serve as a model for local jurisdictions to follow. For example, some of the ongoing efforts to address climate change and housing are opportunities to create greater ongoing coordination. However, ODOT, in its role as the State's transportation agency, must weigh the trade-offs of prioritizing a strong transit-supportive housing policy

stance against its broad mission, other priorities, customer needs, executive level directives, funding challenges and other competing factors.

Below is a summary of the opportunities. A more detailed accounting of the opportunities and other key findings are summarized in Table 2-2 in Section 2 of the report.

1. Transit-supportive housing is not a well-defined concept nor a focused concentration within many of the policy and guidance documents. Many state-level policies are generally supportive but may not be designed to specifically encourage transit-supportive housing. The concept should be defined within policy and planning documents and a set of key policies put in place to draw attention to and encourage transit-supportive housing.
2. Coordination between state agencies and local and regional partners is key in addressing and delivering transit-supportive housing. Land use, housing and transit, while addressed within a local community's comprehensive plan, are aspects of the built environment that are often planned separately through separate agencies. While these divisions are necessary because planning for land use, housing and transit involve responding to different policies and use different evaluative tools, greater coordination could help implement complimentary transit and housing. At the state level, ODOT's primary mission is the provision of transportation infrastructure and the allocation of funds that support transportation investments and services. DLCD is primarily concerned with land use and OHCS focuses on affordable housing. Delivering effective transit-supportive housing will require fostering a shared understanding, a vision of the concept and partnerships among these agencies and local jurisdictions.
3. An opportunity exists to leverage recent legislative, executive and agency actions to further transit-supportive housing policies. HB 2001 and HB 2003 focus on missing middle housing and HNA. These legislative actions will change how housing needs are met and the densities of Oregon communities. EO 20-04 and 17-20 are focused on climate action and GHG emissions, establishing emissions targets, emissions reductions and climate related performance measures for both affordable housing and transportation projects. In addition to these actions, ODOT's SAP creates a new vision and new priorities for the organization. Combined, these actions create space to find opportunities to establish transit-supportive housing policies that address a combination of these initiatives within multiple state-level agencies.
4. Transit-supportive housing performance measures, evaluation criteria and guidance would benefit any transit-supportive housing policy. As previously discussed, transit-supportive housing is not a strongly defined concept within Oregon state-level policies. If it becomes a policy focus, implementation will benefit from being able to assess outcomes, track goals and refine strategies promoting transit-supportive housing.

This white paper outlines the broad policy frameworks already in place and available to the State that can influence the provision of housing and transportation investments. Many tools are available to State agencies and exert influence across many local decisions. Future white papers will concentrate on exploring the local and regional policy landscapes from a selection of Oregon communities. Between this Statewide Policy

Review and a similar review of local and regional policies, a more complete picture can be created. Together, this work will better enable ODOT and other state agencies—in concert with local partners—to make strategic decisions and deploy investments that can improve community outcomes relating to the availability and affordability of housing choice and efficient use of the transportation network.