Is Transit Oriented Development Affordable for Low and Moderate Income Households?

Dr. Reid Ewing and Justyna Kaniewska

Affordability

- Nominal affordability ceiling for a household is 30 percent of income for housing (H), 15 percent of income for transportation (T), and 45 percent of income for the sum(H+T).

How Affordable Is HUD Affordable Housing?

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ABSTRACT

This article assesses the affordability of U.S. Department of Housing and Urban Development (HUD) rental assistance properties from the perspective of transportation costs. HUD housing is, by definition, affordable from the standpoint of housing costs due to limits on the amounts renters are required to pay. However, there are no such limitations on transportation costs, and common sense suggests that renters in remote locations may be forced to pay more than 15% of income, a nominal affordability standard, for transportation costs. Using household travel models estimated with data from 15 diverse regions around the United States, we estimated and summed automobile capital costs, automobile operating costs, and transit fare costs for households at 8,857 HUD rental assistance properties. The mean percentage of income expended on transportation is 15% for households at the high end of the eligible income scale. However, in highly sprawling metropolitan areas, and in suburban areas of more compact metropolitan areas, much higher percentages of households exceed the 15% ceiling. This suggests that locational characteristics of properties should be considered for renewal when HUD contracts expire for these properties, based on location and hence on transportation affordability.

Is Sprawl Affordable for Americans?

Exploring the Association Between Housing and Transportation Affordability and Urban Sprawl

Shima Hamidi and Reid Ewing

- The combined cost of housing and transportation declines as places become more compact.

- As metropolitan compactness increases, transportation costs decrease faster than housing costs increased, creating a net decline in household costs.

What is TOD?

TOD is widely defined as compact, mixed-use development near transit facilities with high-quality walking environments, not necessarily at the expense of automobile access.

Dense

Mixed use

Pedestrian-friendly

Self-contained parking

Built after transit

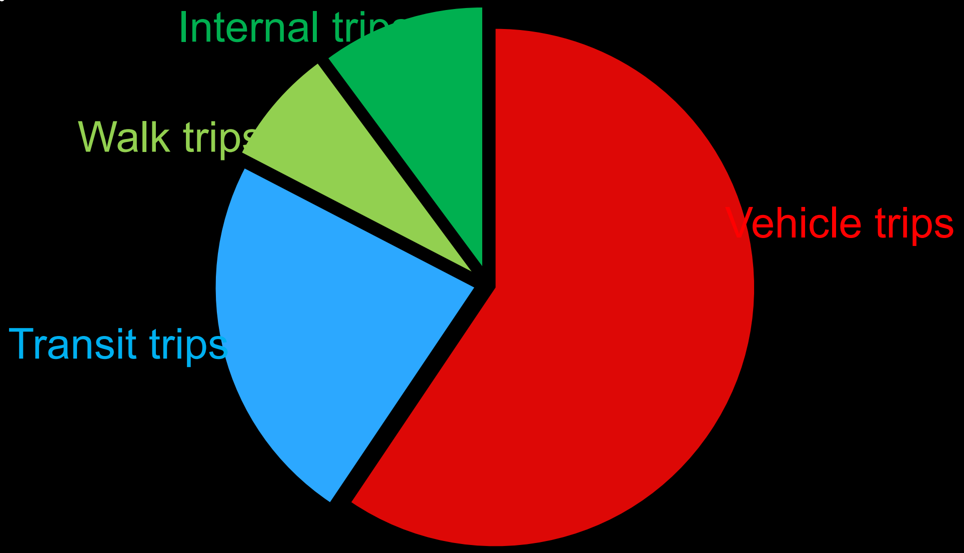
Fully developed or nearly so

Adjacent to transit

Research Questions

- Does TOD style development capitalize on increased accessibility by demanding higher rents than comparable contemporary developments with similar amenities?

- How much of the travel demand is captured internally or satisfied by alternate modes?



- Does the combination of H+T exceeds affordability standards for different income groups?

Redmond TOD, Seattle

Rhode Island Row, Washington D.C.

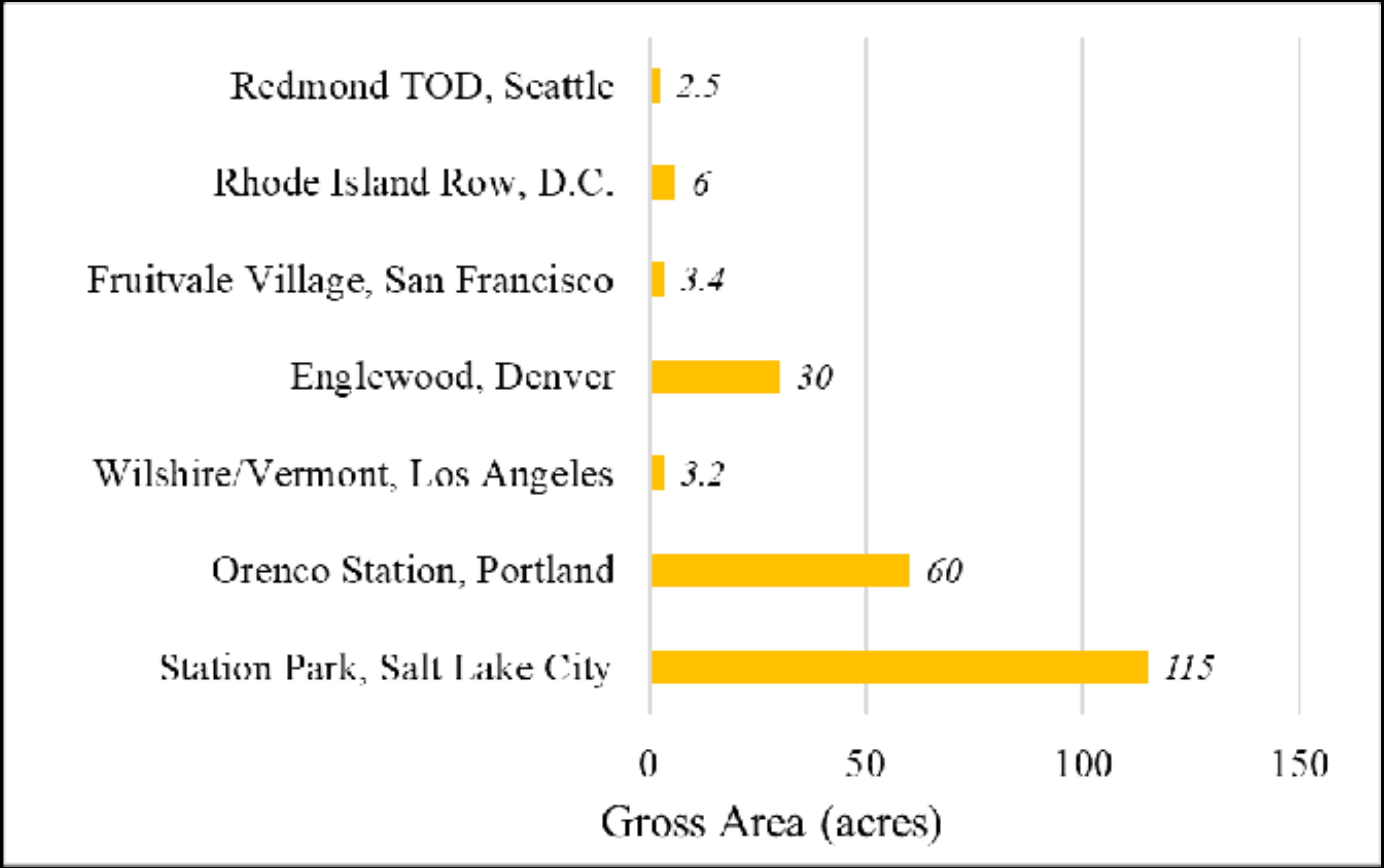
Fruitvale Village, San Francisco

Wilshire/ Vermont, Los Angeles

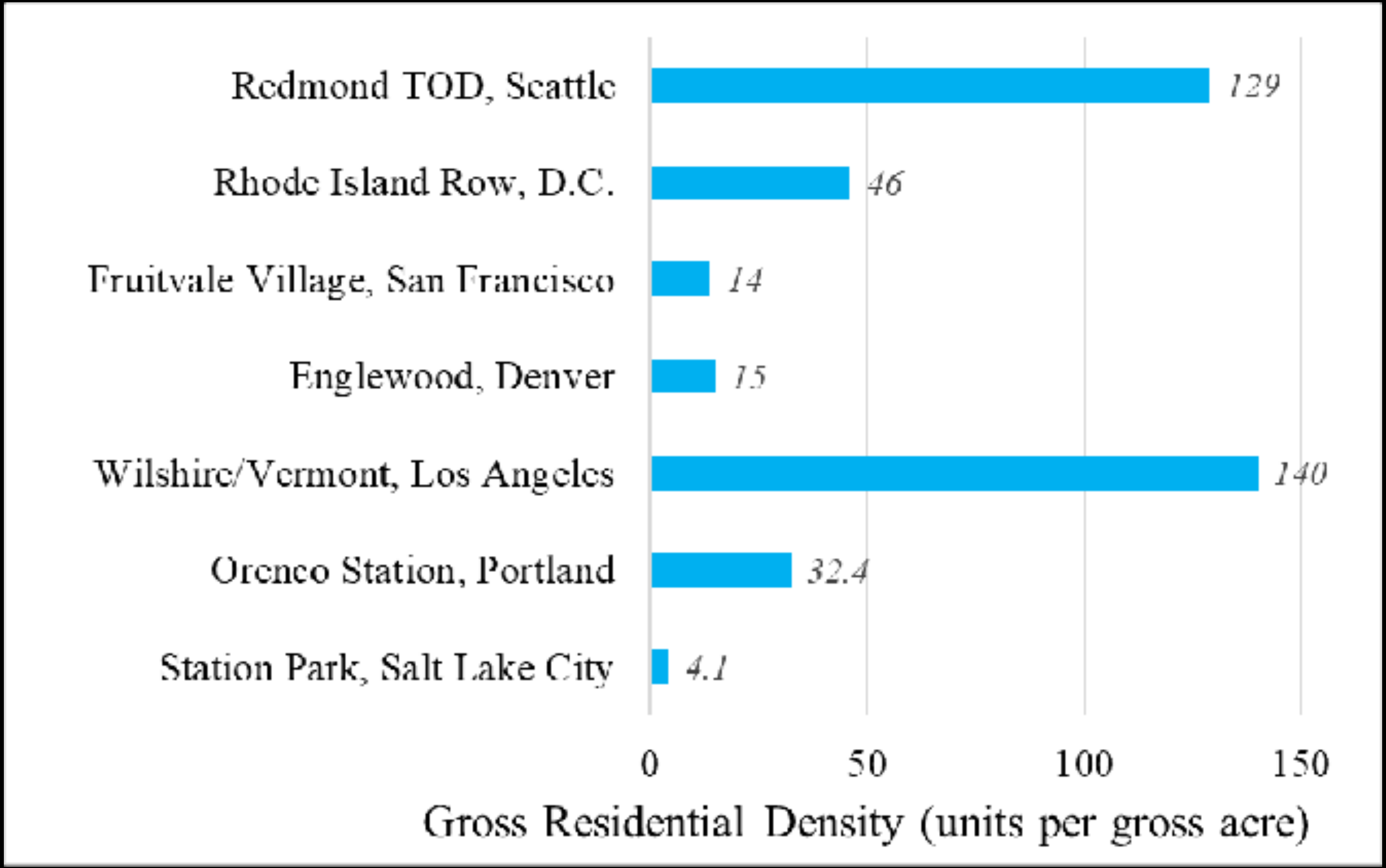
Englewood TOD, Denver

Orenco Station

Summary Across the Sites



Summary Across the Sites



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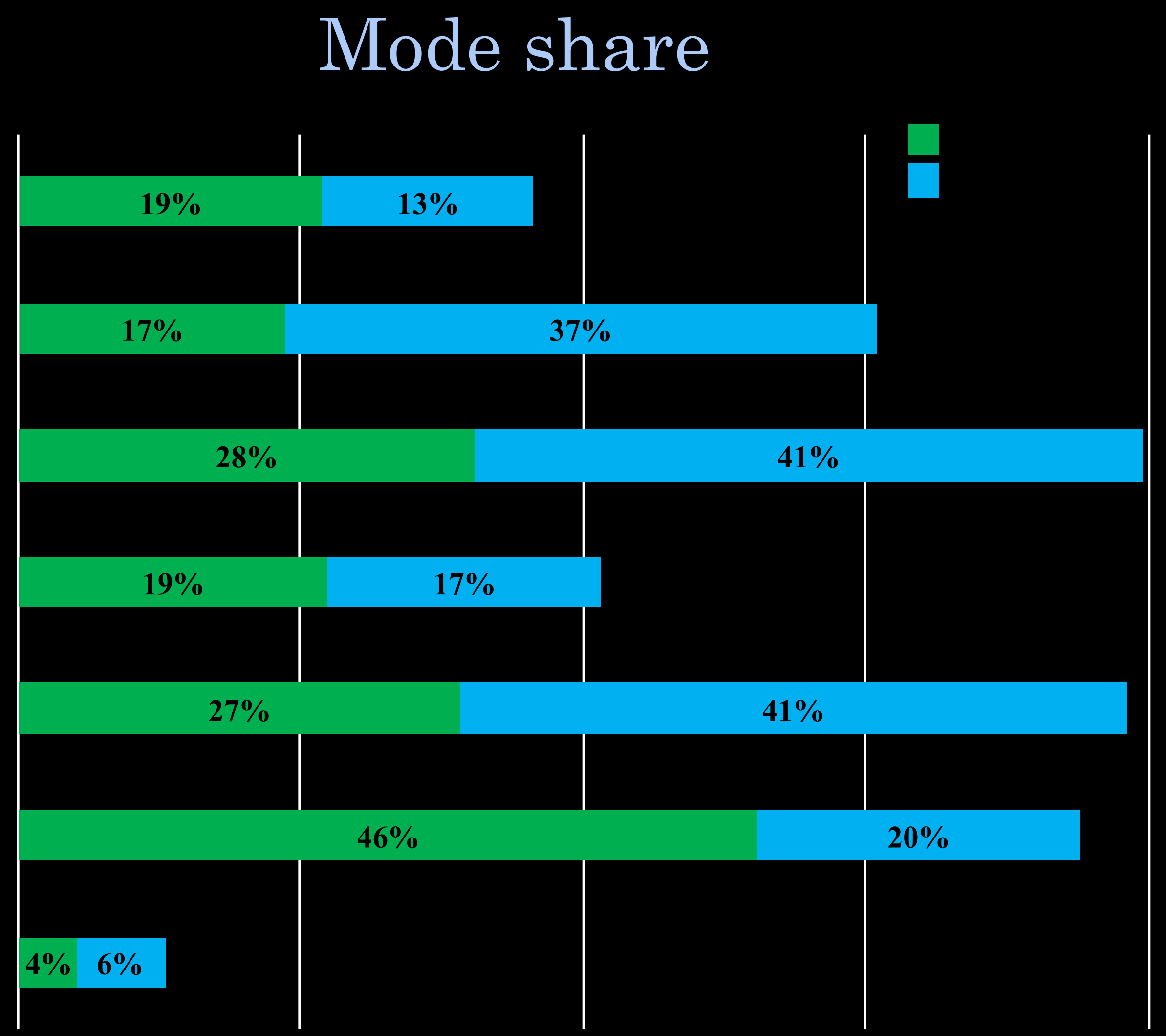

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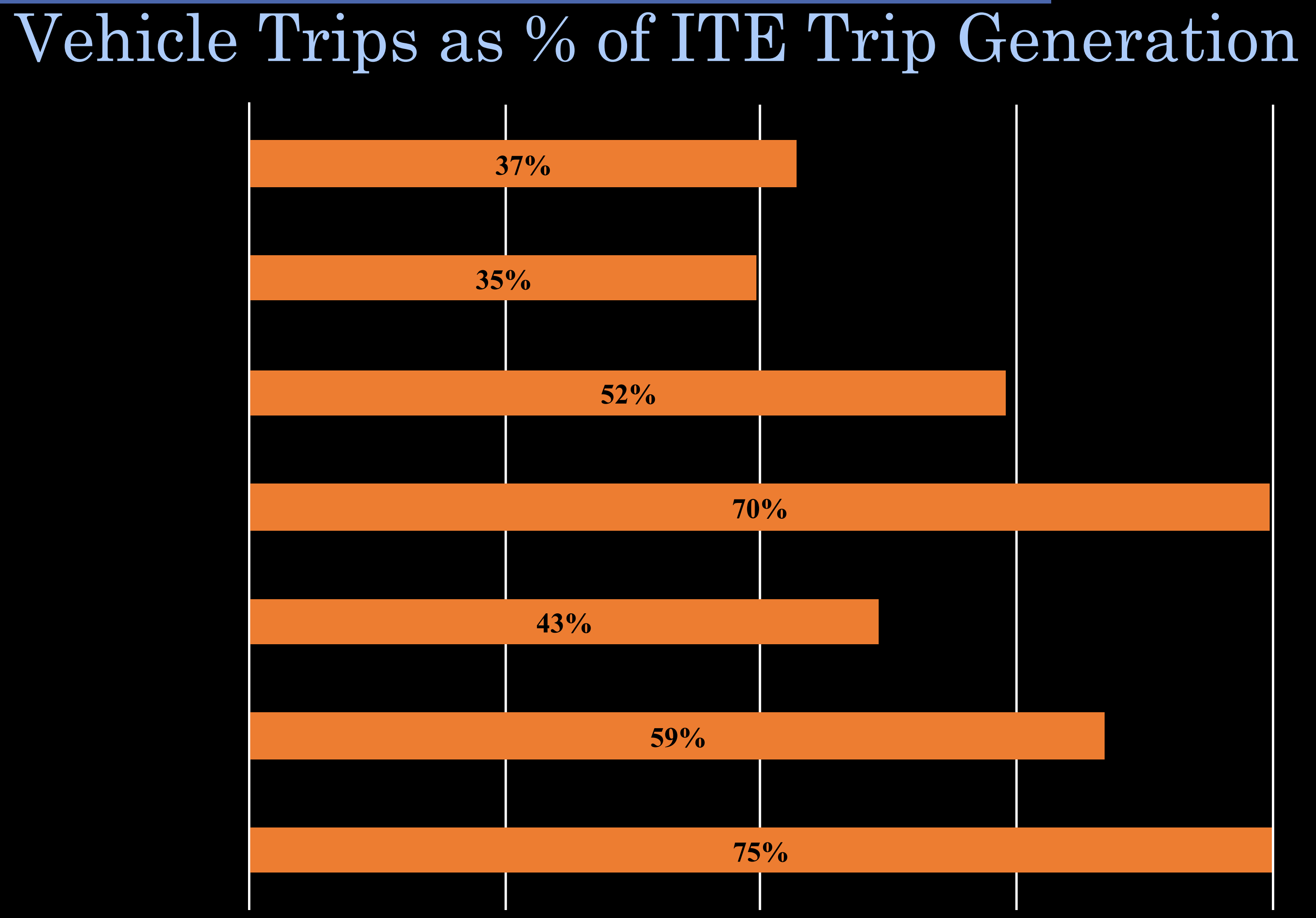
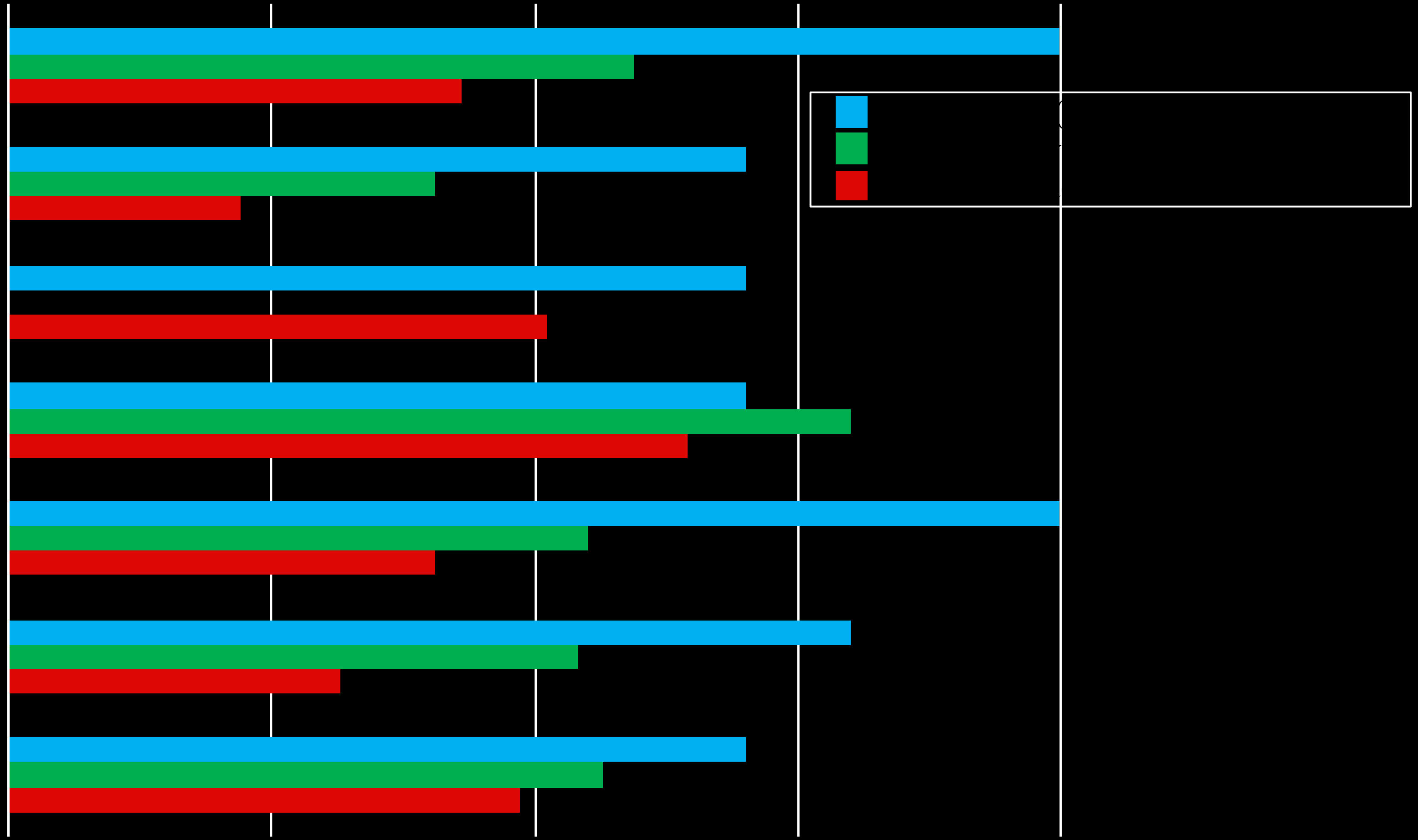


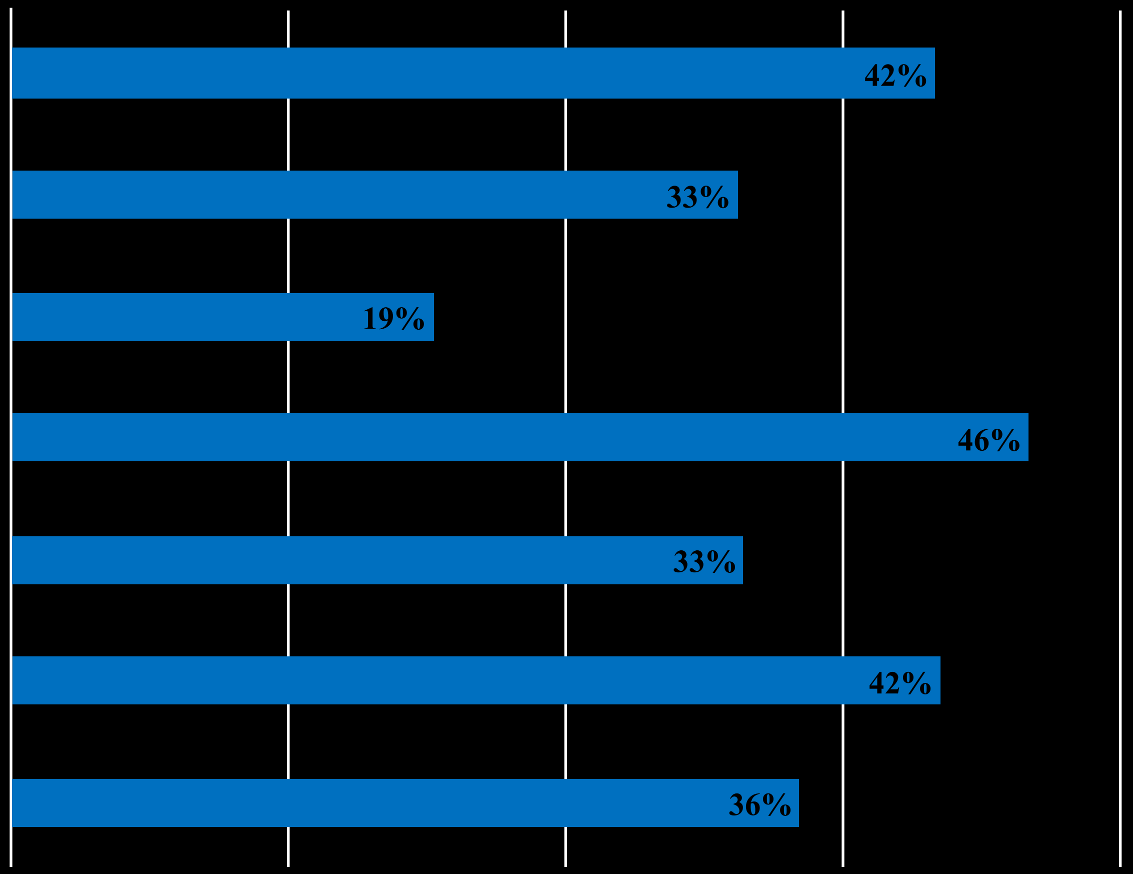
Summary Across the Sites

Residential Parking Supplies and Demands



Summary Across the Sites

Peak Parking Demand as % of ITE Guideline



Parking Policies

- Lowest Parking Demand at Fruitvale Village, Rhode Island Row, and Wilshire/Vermont

1. Shared Parking
2. Unbundled Residential Parking
3. Paid Commercial Parking

The H in H+T

This study assesses rent premiums associated with living in TODs and answers the question of whether TOD style development is **affordable for low- and moderate-income households**, defined respectively as **50% and 80% of the AMI**. It also identifies **measures** taken by decision-makers (mainly jurisdictions and transit operators) and TOD developers to make housing affordable for low- and moderate-income households. We contacted metropolitan planning organizations, transit operators, and major cities to get a list of potential TODs. Out of the inventory of **183 potential TODs** within 26 rail-served regions, **85 TODs within 23 regions** meet our eight criteria and our analysis of housing affordability is based on these 85 cases.

Luxury Apartments with Auto Owners

Research Questions

- How do housing costs at TODs directly adjacent to rail stations compare to standards of affordability for low- and moderate-income households in the region?
- What proportion of TODs in the U.S. provides affordable housing units, and what are the relative shares of designated versus naturally occurring affordable units?
- What proportion of the housing units in TODs is affordable? Is the level of affordability the same for families of different sizes?
- What are the mechanisms used by TOD developers or jurisdictions to provide affordable housing?
- Do all the mechanisms result in similar levels of affordability?
- What proportion of jurisdictions has regulatory vs. voluntary measures?

Potential TODs

COVID

Rail criteria → **National TOD Database** → **Contacting regions** → **183**

Rail criteria

- Three types of transit systems considered: commuter rail, light rail, heavy rail
- More than one rail line required

National TOD Database

- Identified regions that meet the two rail criteria
- **26 regions in the U.S. meet our criteria and are included in this study**

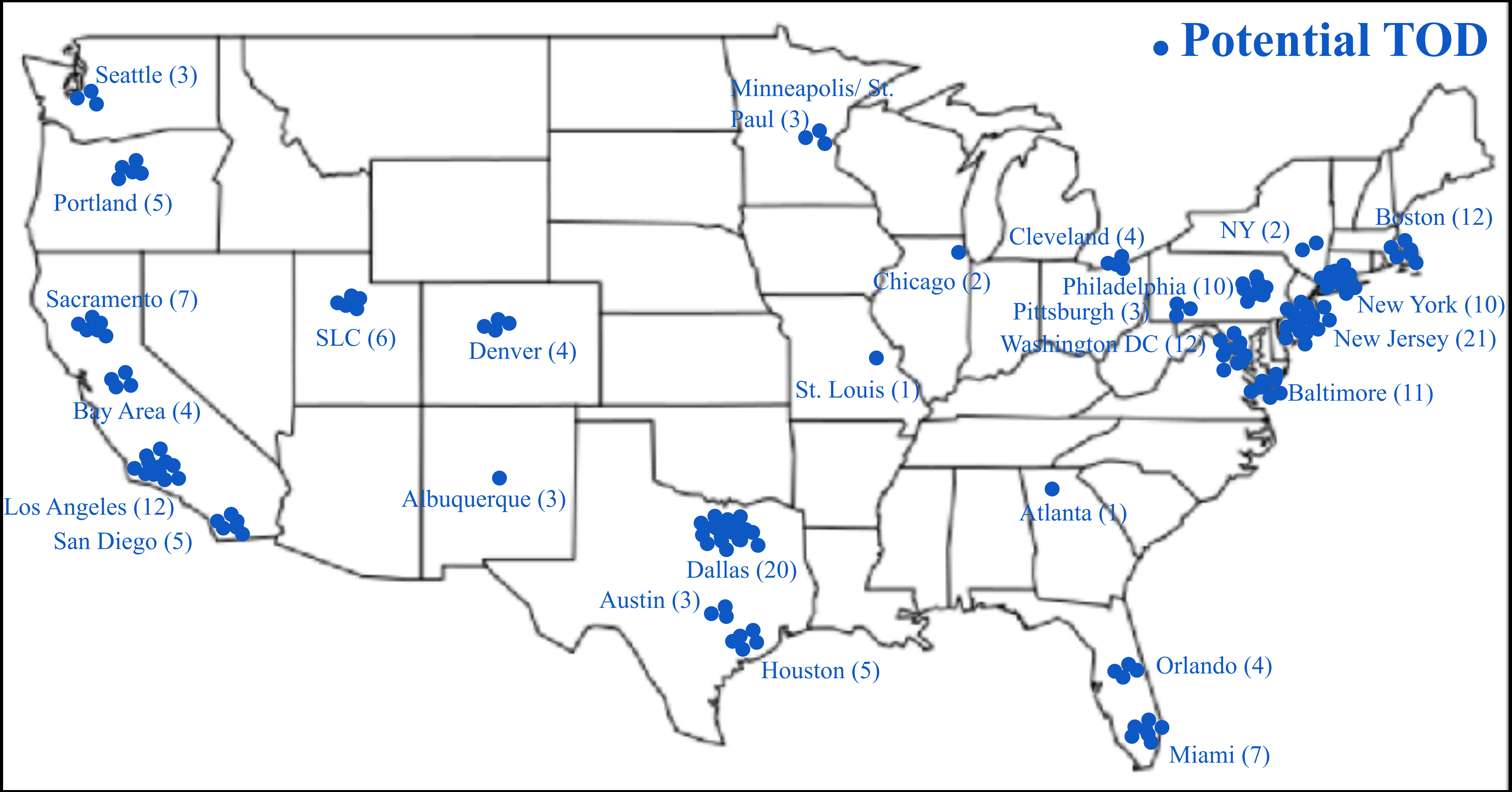
Contacting regions

- Contacted MPOs, transit operators, and major cities in the 26 regions to get a list of potential TODs

183

- Planners in most of these agencies responded to our requests
- Transit operators have the best knowledge of TOD projects in their regions

183 Potential TODs



Selecting TODs

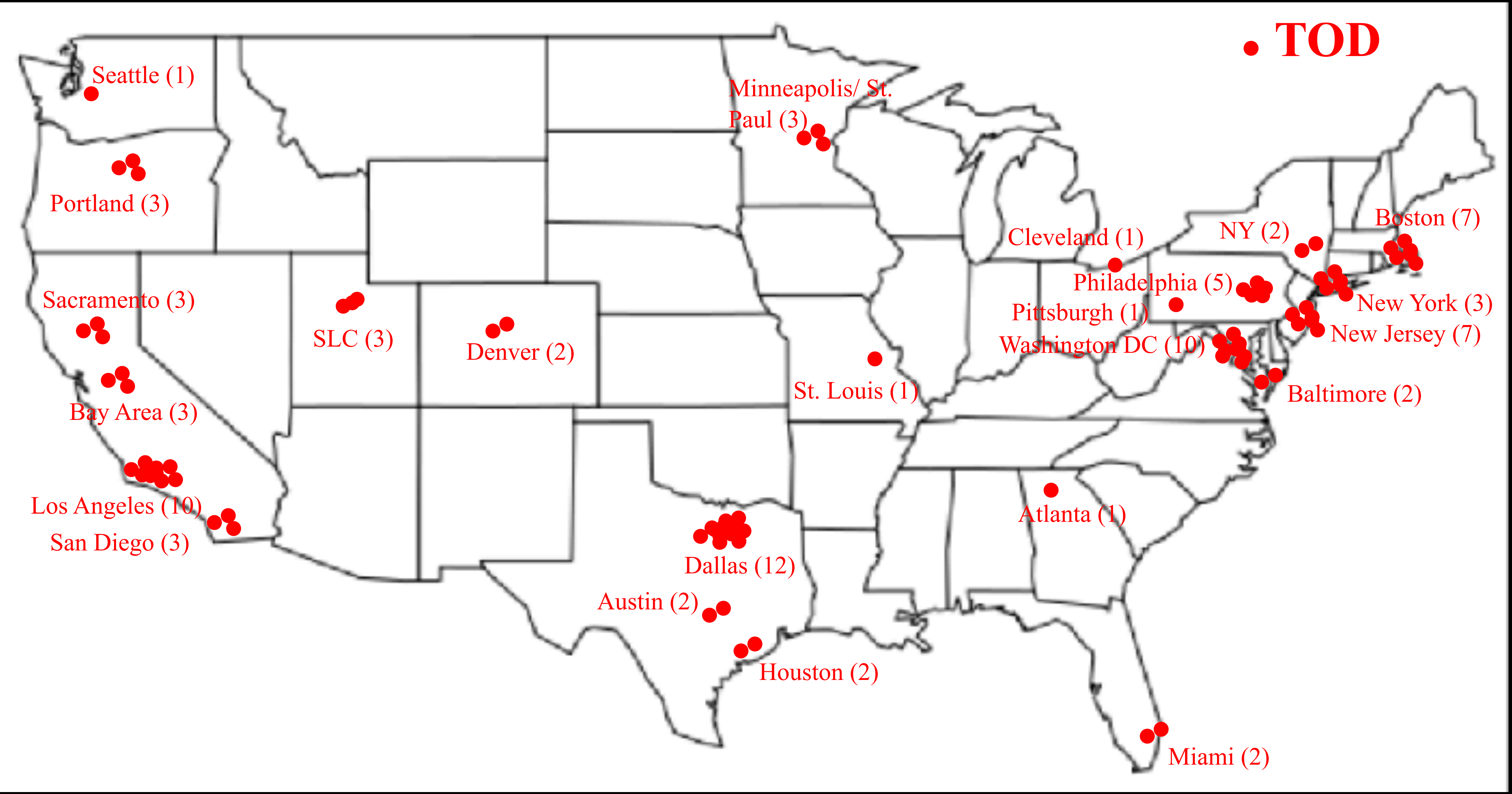
- 186 potential TODs
- in 26 regions

The 7 criteria:

1) Dense and multistory
2) Mixed use (residential and commercial)
3) Pedestrian-friendly with public space
4) Self-contained parking
5) Adjacent to transit
6) Fully developed or nearly so
7) Built after transit

- 85 TODs
- 117 individual projects/ developments
- 23 regions
- 42 counties
- 51 cities

85 TODs


TOD
Seattle (1)
Portland (3)
Sacramento (3)
Bay Area (3)
Los Angeles (10)
San Diego (3)
SLC (3)
Denver (2)
Minneapolis/ St. Paul (3)
St. Louis (1)
Dallas (12)
Austin (2)
Houston (2)
Atlanta (1)
Miami (2)
Cleveland (1)
Philadelphia (5)
Pittsburgh (1)
Washington DC (10)
Baltimore (2)
NY (2)
Boston (7)
New York (3)
New Jersey (7)

Summary of Key Findings

AH: Affordable Housing
DAH: Designated Affordable Housing
NOAH: Naturally Occurring Affordable Housing

Regions	23		# of designated Affordable Housing units*	4641		# of TODs with designated AH units	51%
# of TODs	85		% of designated Affordable Housing units	13%		# of projects with designated AH units	44%
# of counties	42		# of Naturally Occuring Affordable Housing*	2630		# of TODs with NOAH	40%
# of cities/ municipalities	51		% of Naturally Occuring Affordable Housing*	7%		# of projects with NOAH	36%
# of projects	117		Total # of Affordable Housing* units	7271			
Total # of units	35614		% of Affordable Housing	20%			

TODs, transit stations and projects

Methodology

- A transit station may have more than one TOD

1 transit station ≠ 1 TOD

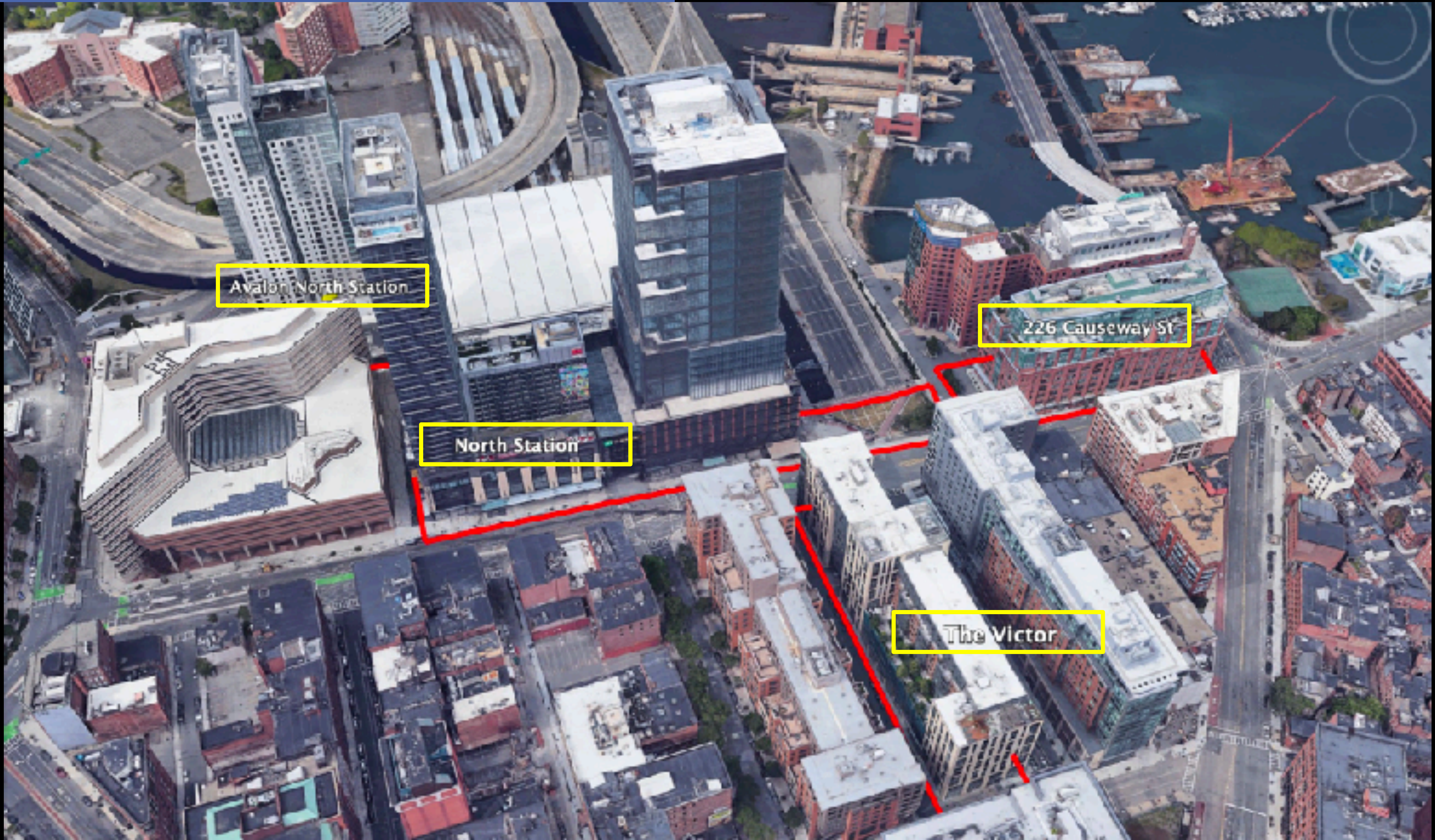
- A TOD may consist of more than one individual project/ development (examples on the following slides)

1 TOD ≠ 1 project

- One project does not necessarily mean one single building
- We define a project as a separate, self-contained building complex with a separate name and a unique legal and marketing identity
- Different individual projects are usually (but not necessarily) built by different developers in different years, and thus are subject to different affordable housing requirements

TODs vs. transit stations

Example: Boston's North Station has 4 TODs



TODs vs. individual projects/ developments

Example: McArthur Station (Oakland, CA) has 4 projects developed by 3 developers in different years

Block A and C: developed by Hines in 2020 and 2019 respectively
Block B: developed by Boston Properties in 2020
Block D: developed by Bridge Housing 2016 (nonprofit developer: 100% affordable)

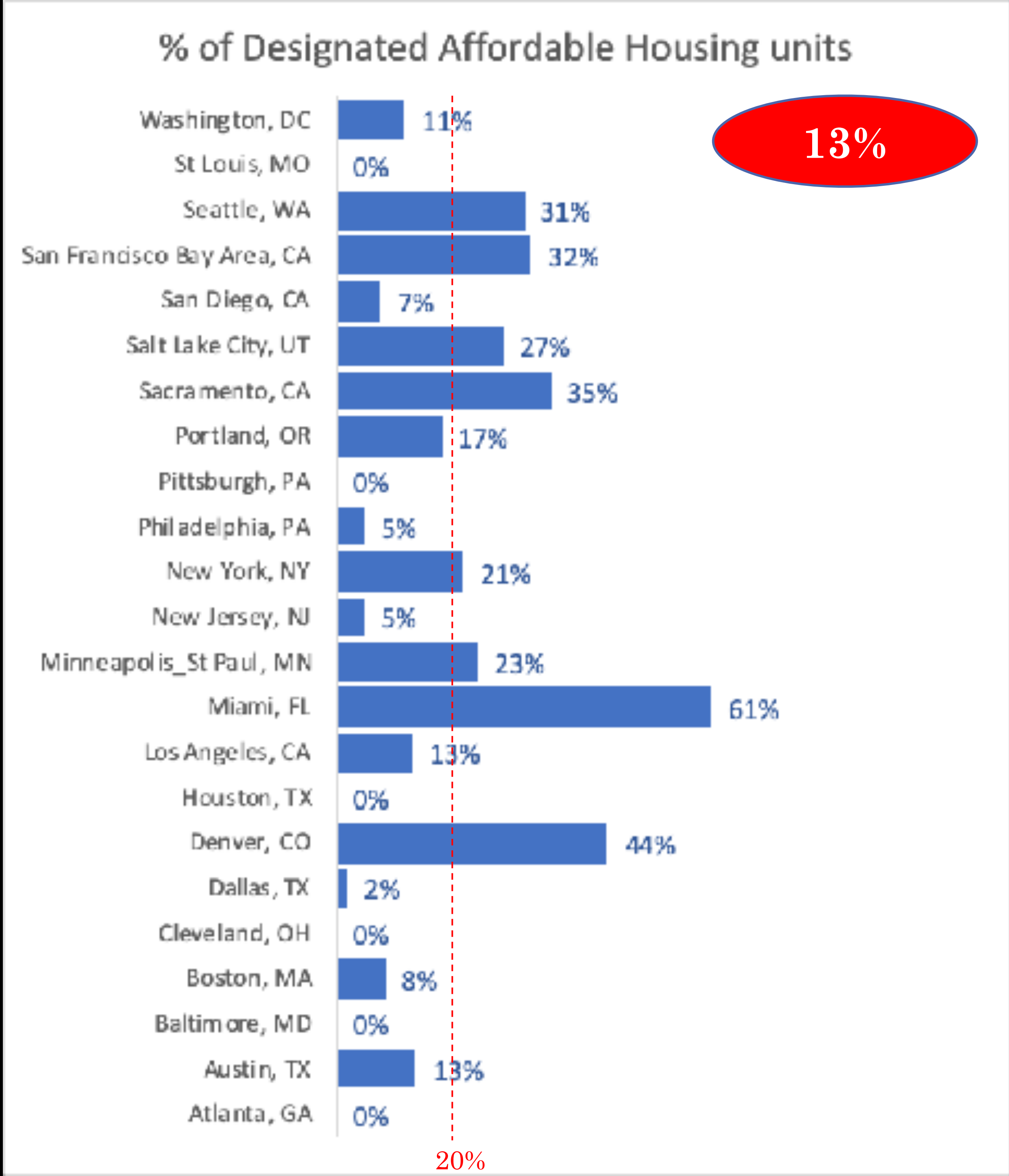
Designated Affordable Housing

Definitions

- **Designated affordable housing units, also referred to as low-income housing, income-restricted housing or workforce housing, result from either <u>regulatory requirements imposed by city/ county/state authority or voluntary participation in city/county run programs</u> and policies,** i.e. inclusionary housing/ zoning ordinances or policies
- **They may also be produced as a result of <u>joint projects</u> conducted by a commercial or nonprofit developer and any number of local government agencies such as, but not limited to, Parking Authorities, Economic Development Authorities, City/ County Departments of Transportation, Housing Bureaus, and public universities. In such instances, the projects receive some amount of <u>public funding</u>.**
- **The units are often designed as affordable for a certain period of time, during which they are <u>monitored</u> by a city/ program that helped to produce them,** i.e. the city of Boston, Low Income Housing Tax Credit Program

Designated Affordable Housing - findings

- 6 (26%) Regions do not have any designated income-restricted units
- Further 5 regions (22%) have less than 10% of their stock designated as affordable
- ½ of the 85 TODs have some DAH units
- 42 TODs <u>(49%) do not have any designated low-income units</u>
- Slightly less than ½ of individual projects have some DAH units
- The high percentage of affordable units usually results from single projects that are designated 100% affordable (more on it later)



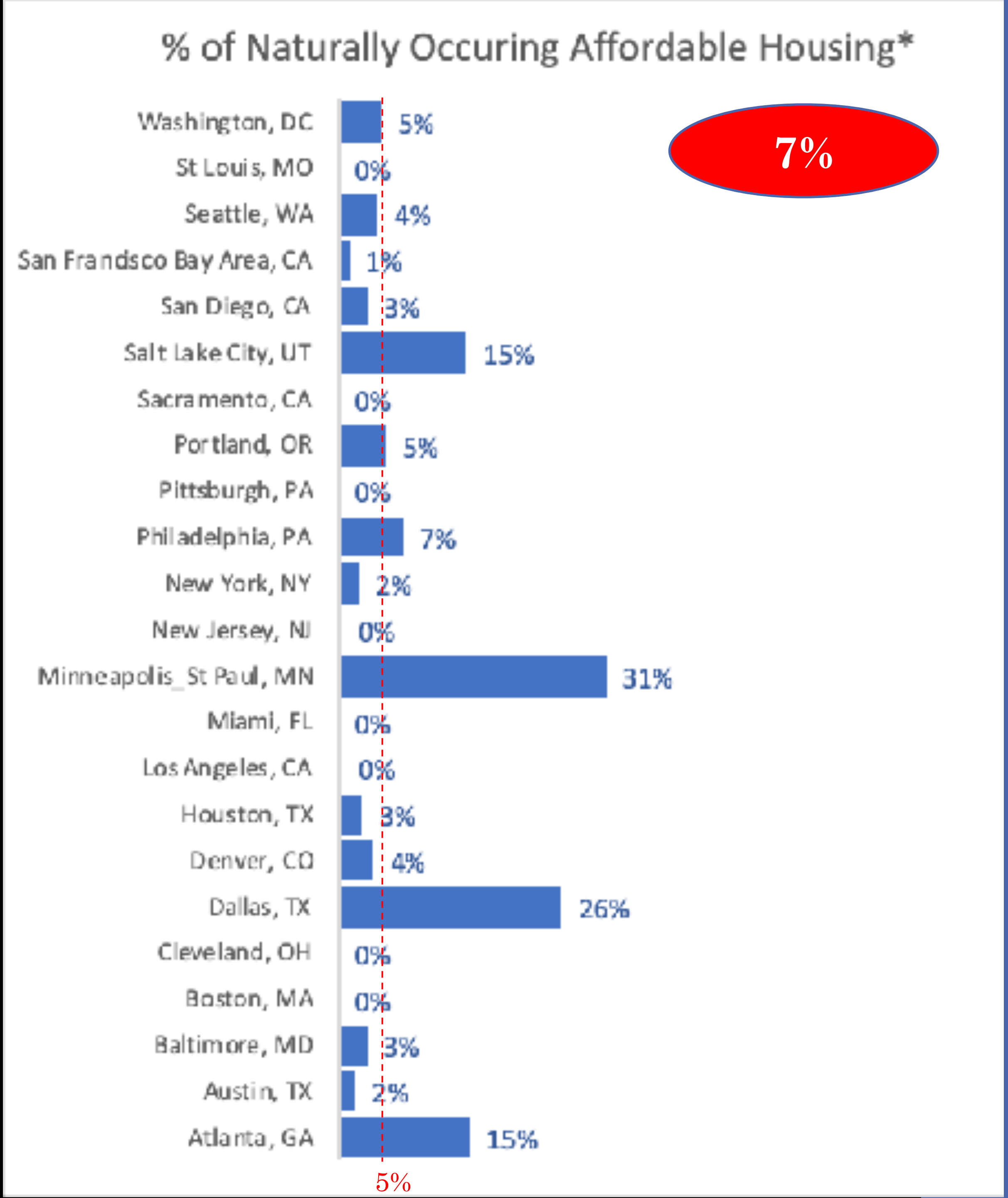
Naturally Occurring Affordable Housing

Methodology

- Naturally Occurring Affordable Housing refers to residential rental properties that maintain <u>low rents without federal subsidy and have not been built in response to city/county/state regulations</u> or policies or as a result of some development agreement that included such a requirement
- We estimated the number of NOAH units based on the availability of units at certain rent levels as of <u>July, 2021</u>

Naturally Occurring Affordable Housing - findings

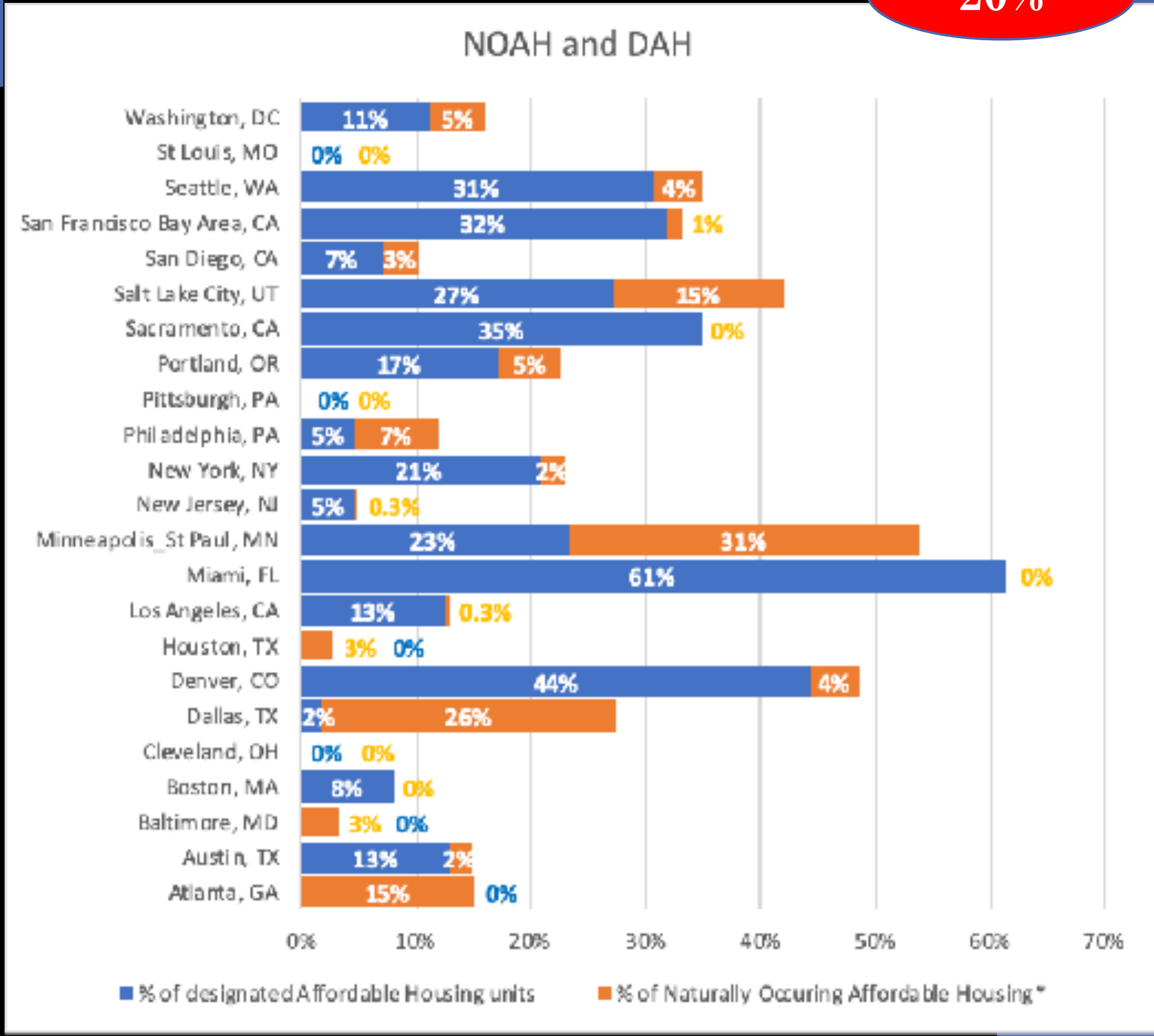
- 6 regions (26%) do not have any NOAH units
- Only 5 Regions have more than 5% of the TOD housing units naturally affordable
- 40% of the TODs have some NOAH units in their stock
- As of July 2021, <u>60% of the TODs did not have any NOAH units</u>
- 1/3 of the individual projects have some NOAH units in their stock
- Slightly more TODs and individual projects have DAH than NOAH



NOAH and DAH – combined numbers

- **There are significant disparities in the allocation of affordable housing (both designated and naturally occurring) across regions - <u>from 0% to over 60%</u>**
- **Generally, Regions have either NOAH or DAH units**
- **In most instances, the difference between high and low percentages of affordable units lie with single projects that are designated 100% affordable**

20%



* As of July, 2021

Shares of Affordable Units by project

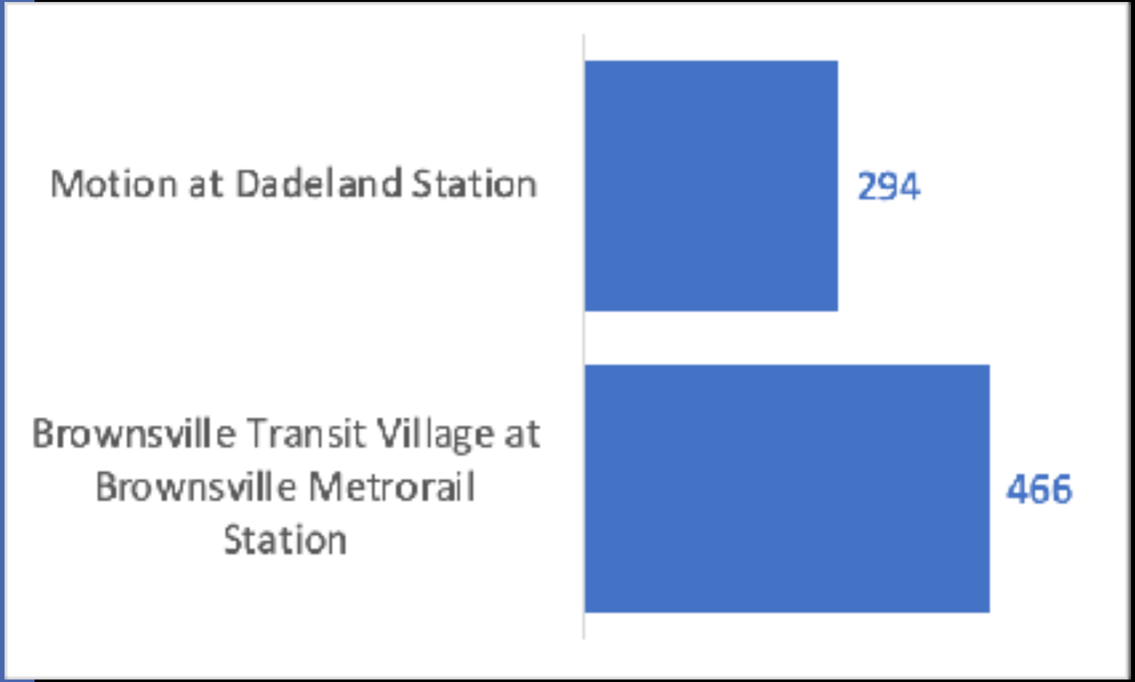
- 60% of all the projects/ developments offer none or less than 10% of their units as affordable
- Only 14% of the projects are 100% affordable

	# of projects	% of projects
% of affortable units		
100%	16	14%
21-99%	15	13%
10-20%	28	24%
<10%	21	18%
0%	37	32%
	117	

Projects that are 100% affordable

Example: Miami, FL

Total # of units



% of NOAH	% of DAH	Overall % of AH
0%	0%	61%
0%	100%	

- Brownsville Transit Village project was brought to life by a public-private partnership between Carlisle Development Group (affordable housing developer) and Miami-Dade Transit Authority
- It was built on an underutilized city-owned 8-acre parking lot and financed with LIHTC

Mechanisms/ Interventions

Methodology

In order to gain a deeper understanding of mechanisms driving production of affordable housing, we have reviewed a large number of municipal, county and state websites, zoning codes, policy guidelines, websites of various transit operators as well as guidelines and reports prepared by them. We have used LIHTC databases as well as other programs' databases that monitor affordable units. We have looked at transit-oriented development and housing affordability status reports prepared by various governing bodies, as well as tax credit allocation memos written by city and state officials. We have examined various types of mechanisms and interventions – both regulatory and voluntary, bottom-up and top-down approaches – that lead to/stimulate/ necessitate the production of affordable units.

Mechanisms/ Interventions

Summary of findings (1/2)

1. There is a very large range of interventions (both regulatory and incentive-based) utilized at city and county levels, and very few at state and national levels.
2. Generally, there is a large number of different regulations, policies, and approaches that are highly localized, context-dependent, and fragmented
3. There has been an increased public involvement through city- and statewide policy/regulatory measures. Over the past few years, a significant number of cities and states have adopted both voluntary and regulatory measures to ensure sufficient production of affordable units. However, most of them were adopted after a significant share of TODs and developments studied in this project had already been completed.
4. Regulatory measures seem to have a very limited impact on the number of affordable units offered in TODs and are less effective than bottom-up voluntary and targeted programs, policies and actions.

Mechanisms/ Interventions

Summary of findings (2/2)

5. Both voluntary and regulatory measures adopted at city, county, and state levels have only limited impact on numbers/ shares of affordable housing, resulting on average in 5-15% of affordable units and rarely exceeding 20%.
6. All of the TOD projects that are 100% affordable (100% of the units are affordable to households earning no more than 80% of AMI) rely on multiple measures and often receive public funding as well as utilize various zoning relief, fee waivers, and tax exemptions.
7. Over the past few years, there has been a growing number of policies adopted by transit authorities that support and incentivize the production of affordable housing near transit stations.
8. When projects built 10-15 years ago are compared to the ones built recently or are currently under construction, generally a relatively higher share of projects offer affordable units, and the share of affordable units within a given development is higher.
9. There are only a few single measures designed specifically to promote/ incentivize/regulate the production of affordable housing in TODs.

Mechanisms/ interventions at city, county, and state level

- Most policies and regulations are initiated at a city level, with few operating at a county and state level
- These interventions can be further categorized into regulatory and voluntary, bottom-up and top-down, as well as public and private

	Regions	State level AH measures*	County level AH measures*	City level AH measures*
1	Atlanta, GA			✓
2	Austin, TX			✓
3	Baltimore, MD			✓
4	Boston, MA			✓
5	Cleveland, OH			
6	Dallas, TX			✓
7	Denver, CO	✓		✓
8	Houston, TX			
9	Los Angeles, CA			✓
10	Miami, FL			✓
11	Minneapolis_St Paul, MN			✓
12	New Jersey, NJ	✓		
13	New York, NY		✓	✓
14	Philadelphia, PA			✓
15	Pittsburgh, PA			✓
16	Portland, OR			✓
17	Sacramento, CA			✓
18	Salt Lake City, UT			
19	San Diego, CA			✓
20	San Francisco Bay Area, CA			✓
21	Seattle, WA			✓
22	St Louis, MO			
23	Washington, DC			✓

* Both voluntary and regulatory measures: regulations, ordinances, policies, programs, requirements, etc.

Mechanisms– categories and examples

HOUSING AFFORDABILITY MECHANISMS			
		Voluntary	**Regulatory**
Top-down	(1)	**City level policies:**	(1) **Inclusionary Zoning/ Housing Ordinances (City level)**
Examples		**Boston (MA)** - *Inclusionary Development Policy (2000)*	**Denver (CO)** - *Inclusionary Housing Ordinance (2013)*
		Los Angeles (CA) -*TOC (Transit Oriented Communities) Affordable Housing Incentive Program (2017)*	**Oakland (CA)** - *Affordable Housing impact Fees Ordinance (2016)* **Seattle (WA)** - *Mandatory Housing Affordability Policy (2019)*
		Los Angeles (CA) - *Density Bonus Ordinance (2006)*	**Walnut Creek (CA)** - *Inclusionary Housing Ordinance (2014)*
		Washington (DC) - *Affordable Dwelling Unit (ADU) Program*	**Sacramento (CA)** - *Mixed Income Housing Ordinance (2015)*
		Austin (TX) - *'Affordability Unlocked' Development Bonus Program (2018)*	**Sacramento (CA)** - *Affordable Housing Ordinance (2014)*
		Dallas (TX) - *Mixed-Income Development Bonus (Ordinance) (2019)*	**Los Angeles (CA)** - *Inclusionary Housing Ordinance (2020)*
		Fort Worth (TX) - *Neighborhood Empowerment Zones (NEZ)*	**Miami (FL)** - *Inclusionary Zoning (IZ) Ordinance*
		Philadelphia (PA) - *Mixed-income housing bonus (2018)*	**Yonkers (NY)** - *Affordable Housing Ordinance (2013)*
	(2)	**State laws**	**Medford (MA)** - *Inclusionary Zoning Ordinance (2019)* (2) **County and state level programs/ regulations:**
		Colorado - *Bill HB21-1117 (2021)*	**New Jersey** : *Affordable Housing Obligations / Housing Element and*
		California - *State Density Bonus Law*	*Fair Share Plan*
		Virginia - *Affordable Dwelling Unit Ordinance (1990; Virginia Law)*	**Suffolk County, NY** - *Code Section 424-45(C); Core Development Zone (CDZ) (2014)*
			Montgomery County, MD - *Moderately Priced Dwelling Units (MPDUs) Program;*
			Workforce Housing Program
Bottom-up *Examples*	(1)	**Tax credit policies and programs:** **Seattle (WA)** - *Multifamily Property Tax Exemption (MFTE)*	(1) **Public Housing; HOPE VI funding**
		Program (1998)	(2) **Private-public partnerships:**
		Tax Increment Financing	***Long Island Housing Partnership***
		Low-income Housing Tax Credit (LIHTC)	***The District of Columbia real estate project under the Office of the Deputy***
			Mayor for Planning and Economic Development (DMPED) -
	(2)	**Transit Operators Policies:**	
		BART's *(Bay Area Rapid Transit) Transit-Oriented Development Policy*	(3) **Public Funding:**
		MBTA's *(Massachusetts Bay Transportation Authority) Transportation Oriented Development initiative*	***HOME funds from the Washington County Office of Community Development*** ***Grants from OHCS*** *(Oregon Housing and Community Services)* ***and*** *NeighborWorks America*
	(3)	**Discretionary fees abatement/ waivers**	***Grants from The City of Seattle Office of Housing*** - *Seattle, WA*
		Real Estate Tax Abatement	*(Mercy Othello Plaza)*
			Grants/ funding from Contra Costa County Redevelopment Agency -
	(4)	**Private non-profit developers and CDCs (Community Development**	*Bay Area (CA) (Avalon Walnut Creek)*
		Corporations):	***Redevelopment Agency (CRA) Programs*** - *Los Angeles, CA (1600 Vine)*
		The Unity Council *(Social Equity Development Corporation, CDC)*	***City of San Diego Redevelopment Agency Subsidy*** - *San Diego, CA (The Village*
		BRIDGE Housing *(CDC)* ***DEVCO*** *(New Brunswick Development Corporation)*	*at Morena Vista)*
		CDC of Long Island, WCDC *(Wyandanch)*	
	(5)	**Preferential land sale/ lease:**	
		Buildings located on transit operator's or city's land	

Mechanisms/ Interventions

Key Finding: most of the projects (marked in green) had been built before local governments adopted ordinances and policies requiring a certain percentage of units to be set aside as income-restricted units

- Only 32 of 117 projects (27%) were subject to any affordable housing requirements when they were planned and built
- Even now, 23 out of 51 cities (45%) do not have any regulatory requirements regarding the production of income-restricted units.

Projects built before city/county/state wide regulations were adopted

	Regions	# of TODs	# of projects	# of cities/ municipalities	Year each project completed					Year city/ county/ state requirements (3) adopted	# of projects that were subject to city/ county/ state wide requirements (1) when built	# of cities that were subject to city/ county/ state wide requirements (1) in July, 2021	% of designated Affordable Housing Units
1	Atlanta, GA	1	1	1	2007					2018	0	1	0%
2	Austin, TX	2	2	1	2015	2019				n/a	0	0	13%
3	Baltimore, MD	2	2	2	2004	2020				n/a	0	0	0%
4	Boston, MA	7	8	2	2004	2006	2008	2009	2013	2019	0	1	8%
					2016	2018	2019						
5	Cleveland, OH	1	1	1	2018					n/a	0	0	0%
6	Dallas, TX	12	19 (5)	8	1998	2001	2003	2005	2008	n/a	0	0	2%
					2009	2012	2014	2015	2016				
					2017	2018	2019	2020					
7	Denver, CO	2	2	2	2001	2013				2013	0	1	44%
8	Houston, TX	2	2	1	2016	2018				n/a	0	0	0%
9	Los Angeles, CA	9	12 (3)	2	2000	2003	2005	2007	2009	2001, 2020	1	2	13%
					2010	2012	2014	2017	2018				
10	Miami, FL	2	2	1	2011	2019				2018 (4)	0	0	61%
11	Minneapolis_St Paul, MN	3	3 (5)	2	2011	2013				2020	0	1	23%
12	New Jersey, NJ	8	10	8	2005	2009	2011	2012	2013	1999	10	8	5%
					2015	2016	2017						
13	New York, NY	2	3 (5)	2	2003	2008	2015	2019		2013, 2014	2	2	21%
14	Philadelphia, PA	4	4 (5)	2	2013	2014	2018			n/a	0	0	5%
15	Pittsburgh, PA	1	1	1	2019					2019 (6)	0	1	0%
16	Portland, OR	3	13	2	2004	2008	2009	2014	2015	2017	3	1	17%
					2016	2018	2019						
17	Sacramento, CA	3	3 (5)	1	2005	2012	2017			2014	1	1	35%
18	Salt Lake City, UT	3	5	2	2011	2013	2017	2018	2020	n/a	0	0	27%
19	San Diego, CA	3	3	1	1997	2005	2007			2019	0	1	7%
20	San Francisco Bay Area, CA	3	5 (2)	2	2004	2010	2015	2018	2019	2014, 2016	3	2	32%
					2020								
21	Seattle, WA	1	3	1	2011	2017	2018			2019	0	1	31%
22	St Louis, MO	1	1	1	2007					n/a	0	0	0%
23	Washington, DC	10	12 (5)	5	1992	1997	2005	2008	2010	2009, 1974	12	5	11%
					2013	2016	2018	2019					
		85	117	51							32	28	13%

The Fruitvale Village, Oakland, CA

CASE STUDY

Phase I

- **Affordable units**: **<u>10</u>** (out of 47; **<u>20%</u>**)
- **Developer**: the Unity Council (**a non-profit Social Equity Development Corporation**
- **Funding**: commercial

The state and cities get involved which makes higher share affordability possible

Phase II-A (Casa Arabella)

- **Affordable units**: **<u>94</u>** (out of 367, **<u>26%</u>**)
- **Developers:** : the Unity Council and EBALDC (East Bay Asian Local Development Corporation)
- **Funding**: **<u>City of Oakland, Alameda County, the State of California, the Oakland Housing Authority</u>** and banks

Phase II-B

- **Affordable units**: **<u>181</u>** (**<u>100%</u>**)
- **Developers:** : the Unity Council and BRIDGE Housing (nonprofit developer of affordable homes)
- **Funding**: **<u>the Affordable Housing and Sustainable Communities</u>** (AHSC) grant from the State of California Strategic Growth Council
- **Land**: developed on city-owned property (**long term lease from BART)**

Thank you

APPENDIX

What is TOD?

TOD is widely defined as compact, mixed-use development near transit facilities with high-quality walking environments, not necessarily at the expense of automobile access.

- **Dense and multistory**
- **Mixed use (residential and commercial)**
- **Pedestrian-friendly with public space**
- **Self-contained parking**
- **Adjacent to transit**
- **Fully developed or nearly so**
- **Built after transit**

Affordability of market-rate housing

Methodology

- First, we tried to establish whether market-rate apartments in the 85 TODs are affordable to low (30-50% of AMI) and moderate (50-80% of AMI) income households of 2, 3, and 4 persons
- We collected the lowest prices of studio, one-bedroom, two-bedroom, and three-bedroom apartments (if available) in each individual project/ development
- To show results at the regional level, we worked with ranges of minimal prices as different TODs in a given region, and individual projects within any TOD, have different lowest price levels for various apartment sizes
- We compared collected rent levels to 2021 income limits set by the Department of Housing and Urban Development (HUD) for low income (50-80% of AMI) and very low income (30-50% of AMI) households of 2, 3, and 4 persons
- We assumed that 2-person families can occupy studios or 1-bedroom apartments, 4-person families are eligible for 2-bedroom apartments, and 3-person families can occupy either 1- or 2-bedroom apartments based on "2 per bedroom plus 1" rule

Designated Affordable Housing - findings

- ½ of the 85 TODs have some DAH units
- 42 TODs (49%) do not have any designated low-income units
- Slightly less than ½ of individual projects have some DAH units

	Regions	# of TODs	# of projects	# of TODs with designated AH	# of projects with designated AH
1	Atlanta, GA	1	1	0	0
2	Austin, TX	2	2	1	1
3	Baltimore, MD	2	2	0	0
4	Boston, MA	7	8	6	6
5	Cleveland, OH	1	1	0	0
6	Dallas, TX	12	19	1	1
7	Denver, CO	2	2	1	1
8	Houston, TX	2	2	0	0
9	Los Angeles, CA	9	12	7	7
10	Miami, FL	2	2	1	1
11	Minneapolis_St Paul, MN	3	3	1	1
12	New Jersey, NJ	8	10	5	5
13	New York, NY	2	3	1	1
14	Philadelphia, PA	4	4	1	1
15	Pittsburgh, PA	1	1	0	0
16	Portland, OR	3	13	3	4
17	Sacramento, CA	3	3	1	1
18	Salt Lake City, UT	3	5	1	2
19	San Diego, CA	3	3	2	2
20	San Francisco Bay Area, CA	3	5	3	5
21	Seattle, WA	1	3	1	3
22	St Louis, MO	1	1	0	0
23	Washington, DC	10	12	7	9
		85	117	43	51
				51%	44%

Naturally Occurring Affordable Housing - findings

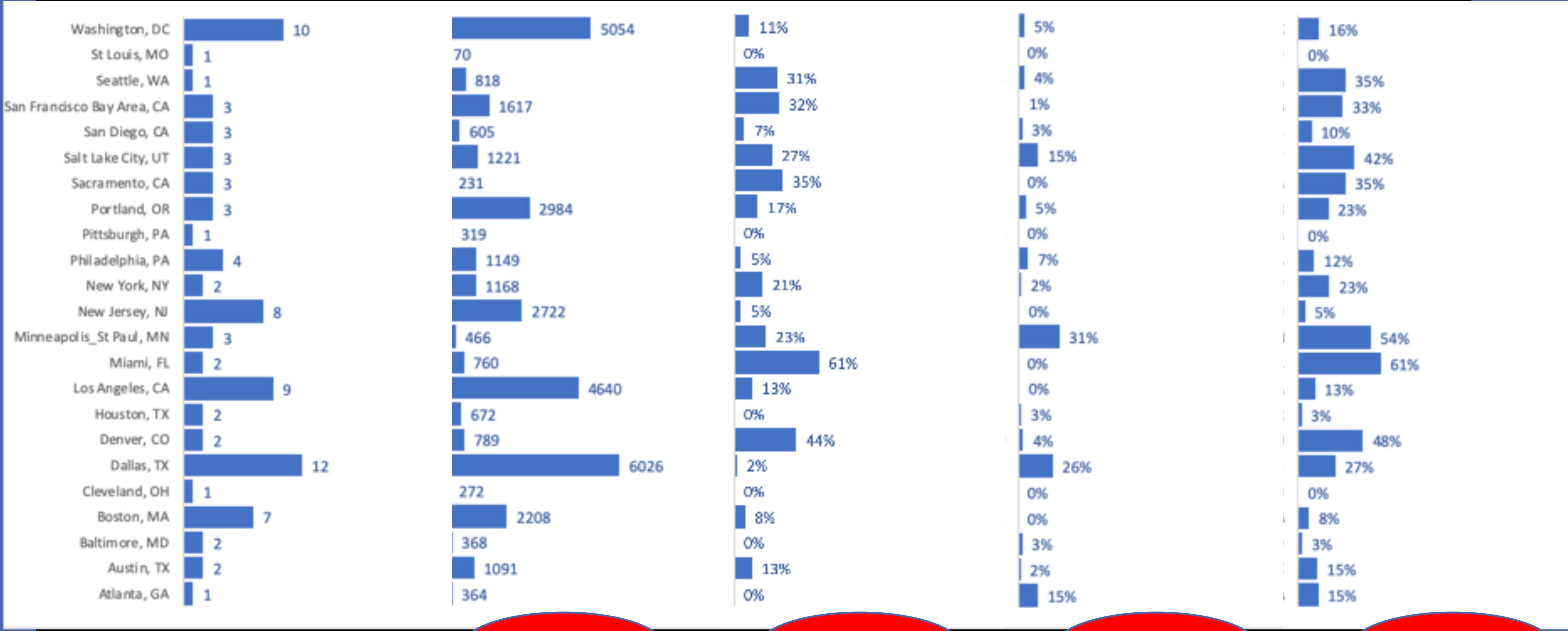
- 40% of the TODs have some NOAH units in their stock
- As of July 2021, 60% of the TODs did not have any NOAH units
- 1/3 of the individual projects have some NOAH units in their stock
- Slightly more TODs and individual projects have DAH than NOAH

	Regions	# of TODs	# of projects	# of TODs with NOAH	# of projects with NOAH
1	Atlanta, GA	1	1	1	1
2	Austin, TX	2	2	1	1
3	Baltimore, MD	2	2	1	1
4	Boston, MA	7	8	0	0
5	Cleveland, OH	1	1	0	0
6	Dallas, TX	12	19	11	14
7	Denver, CO	2	2	1	1
8	Houston, TX	2	2	1	1
9	Los Angeles, CA	9	12	1	1
10	Miami, FL	2	2	0	0
11	Minneapolis_St Paul, MN	3	3	2	2
12	New Jersey, NJ	8	10	1	1
13	New York, NY	2	3	1	1
14	Philadelphia, PA	4	4	2	2
15	Pittsburgh, PA	1	1	0	0
16	Portland, OR	3	13	3	4
17	Sacramento, CA	3	3	0	0
18	Salt Lake City, UT	3	5	2	3
19	San Diego, CA	3	3	1	1
20	San Francisco Bay Area, CA	3	5	1	1
21	Seattle, WA	1	3	1	2
22	St Louis, MO	1	1	0	0
23	Washington, DC	10	12	3	5
		85	117	34	42
				40%	36%

Affordable Housing by Region

AH: Affordable Housing
DAH: Designated Affordable Housing
NOAH: Naturally Occurring Affordable Housing
\# Overall number/ average

#of TODs | Total # of units | % of DAH | % of NOAH | % of AH



35,614 | 13% | 7% | 20%