

# A Public Health Opportunity for Transit-Oriented Development (TOD) in Washington

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**Authored by:** Gen Conley, Abbie Correll, Lauren Gulbicki, Aoi Tischer

**Collaborator:** Nivya Murthi, Transportation Choices Coalition



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## Executive summary

This policy analysis focused on transit-oriented development (TOD) in Washington state. Washington's newly passed legislation, House Bill 1491, mandates increased housing density and affordability near transit hubs; however, there are gaps in how state TOD policy integrates other aspects of public health. The resulting policy falls short in creating safe, equitable, healthy, and accessible communities centered around transit hubs. Without intentional alignment with public health measures beyond housing, TOD implementation can contribute to displacement and gentrification, fail to reduce preventable traffic injuries, and may fall short of environmental and mobility goals.

To address gaps in current TOD policy, two policy alternatives were evaluated—Complete Streets and Equitable TOD (ETOD). Complete Streets is a policy approach that focuses on designing streetways for all users – pedestrians, cyclists, drivers, and public transit users – of all ages and abilities. ETOD offers a comprehensive policy approach to housing density, affordability, and active transportation infrastructure. We evaluated these policy options using a set of ten criteria, based on insights from key informant interviews and a literature review.

Based on this policy analysis, we recommend:

- TCC **advocates for integrating equitable TOD requirements in any TOD corridor**, including community engagement, minimum housing affordability standards, multimodal safety design, and health equity metrics.
- Short term, the establishment of a **statewide TOD working coalition** to coordinate efforts and establish a **community advisory board** to share power.
- Long term, to develop a **TOD prioritization plan** for equitable implementation, a **public health data tracking dashboard**, and **community-led health impact assessments**. Together, these actions can ensure equitable TOD policy advancements that not only create more affordable and accessible housing options, but also provide safe, healthy, and equitable communities connected to transit throughout the state.

## Introduction

### Problem

Transit-oriented development (TOD) uses compact, mixed-use development to bring together affordable housing, retail, and community spaces near transit centers (Sound Transit, n.d.). The goal of TOD is to create vibrant streetscapes and neighborhoods that are accessible to people walking, cycling, rolling, and using public transportation. Existing TOD policies like House Bill (HB) 1491 in Washington state focus primarily on housing and do not holistically integrate other aspects of public health that could benefit TOD communities (Washington State Legislature, n.d.-c). TOD has the potential to decrease preventable injury, increase access to resources, improve air quality, promote active transportation, and increase housing affordability, if implemented with more intentionality. While TOD policy can be used as a tool to improve public health, it is not currently being designed, implemented, or evaluated through a public health lens.

### Jurisdiction

TOD is a policy approach used throughout the world. Here in Washington, TOD has been implemented at the state and local level through policies such as HB 1491. Some local

jurisdictions in King County, such as Redmond, have created their own related ordinances. However, for this analysis we focused on state-level policies, as Transportation Choices Coalition (TCC; our partner for this project), advocates for accessible transportation for all Washingtonians.

## **Impact**

This public health problem is important to address given that Washington is financially investing large amounts into expanding the transit system and could utilize TOD to better serve and improve Washington communities. Issues of unsafe infrastructure, inequitable access to transportation, displacement, and environmental injustices disproportionately impact marginalized people like low-income and communities of color (Smart Growth America, n.d.-a). When infrastructure improvements are not implemented using an equity lens, the disparities faced by those who have been historically excluded are deepened (Litman, 2020; Morrison & Dallman, 2025; Schweninger et al., n.d.). It is important to note that Washington State is in a budget crisis. Yet, if implemented correctly, TOD can address overlapping issues like traffic safety, environmental concerns, transportation and resource access – creating upstream, integrated solutions.

## **Methods**

### **Phase 1. Literature Review**

We first reviewed background literature provided by our client to assess the problem, the current Washington state policy landscape, and example policies from other jurisdictions. We also used citation chaining and supplemented our literature review using internet gray literature searches. Selected sources included planning documents, transit-agency reports, peer-reviewed papers, and other literature highlighting the importance of incorporating public health into transit infrastructure.

### **Phase 2. Key informant interviews**

We identified a list of potential key informants through recommendations from our client and a stakeholder analysis. Key informants were then selected based on their level of knowledge about TOD, public health, transportation planning, and traffic safety. We developed a semi-structured interview guide (Appendix A). The guide was iteratively refined with input from team members and the client. Interview questions probed about the impact of TOD on community health, TOD implementation, community engagement in planning, and policy alternatives. A total of four key informant interviews (N=5 key informants) were facilitated in the span of two weeks. Interviews took place over zoom. Informed consent was gathered to audio record. A notetaker captured main ideas, quotes, and cleaned these notes using interview transcripts generated by Zoom. We conducted a rapid qualitative analysis. Domains and key themes were deductively identified based on our interview guide. Themes were compiled using a matrix.

### **Phase 3. Policy evaluation**

Findings from the literature review and key informant interviews directly informed our identification and analysis of policy alternatives. Policies were scored on a scale between 1-3 using a set of ten criteria. Summary scores were calculated, and results were compiled in a side-by-side table (Appendix E).

## Problem Description

The recently passed HB 1491 represents a huge step in the expansion of transit investment focused on compact, mixed-use infrastructure around major transit stops in Washington state. Major transit stops are defined in HB 1491 as a stop on a high-capacity transit system, whether it is a commuter rail, fixed rail system, or rapid bus transit route (Washington State Legislature, n.d.-c). In the past two decades, cities have adopted TOD policies designed to uplift neighborhoods and increase public transit ridership in addition to pedestrian and cyclist activities around transit hubs – places around transit stations that bring people together through multimodal transportation connections. However, Washington's TOD policies heavily focus on increased housing density, leaving policy gaps in how these initiatives measure, communicate, and address public health and safety (Canadian Association of Road Safety Professionals (CARSP), 2024). Without intentional integration and measurement of public health indicators, TOD policies may neglect broader investment around transit hubs, fail to adequately improve pedestrian and cycling infrastructure, and reinforce inequities through gentrifying neighborhoods and raising rent prices around transit centers in rapidly growing urban areas (Canadian Association of Road Safety Professionals (CARSP), 2024; Freemark et al., 2025).

## Infrastructure Challenges

The state's current transportation system and urban planning reveal infrastructure failures that threaten safety, economic growth, environmental sustainability, and equity (Washington State Department of Transportation, 2024). In 2025, the Washington State Department of Transportation (WSDOT) announced that the highway system is approaching “critical failure” from consistent underfunding for maintenance and repairs that are often diverted to emergency response (Connor McEvoy, 2025). Public goods, like roads and public transportation, often do not have enough investment when left to market forces, and the current WSDOT funding challenges show how quickly public infrastructure can deteriorate without continued public investment.

## Preventable Injury as a Public Health Indicator

U.S. cities are experiencing increasing sprawl that force neighborhoods to be built around personal car use. Decentralized land use and development increase transit costs and reduce options for mobility, resulting in U.S. households spending almost the same amount on transit costs as housing (Belzer & Autler, 2002). This growth trend and reliance on personal vehicles have increased greenhouse gas emissions, traffic fatalities, and public health consequences. Personal vehicles result in 40,000 annual traffic deaths, and per-car passenger fatalities are 17 times higher than for public transit use (Belzer & Autler, 2002). Nationally, preventable pedestrian deaths have increased by 75% since 2010, with Washington state mirroring a similar trend (Smart Growth America, n.d.-b; Transportation Choices Coalition, n.d.).

According to WSDOT, there has been a consistent rise in traffic fatalities across the state, with a 75% increase since 2014 (Washington State Department of Transportation, n.d.-b). A record high fatality rate was reached in 2023, with one person's life lost on Washington roads every 13 hours (Otto, 2024). As of April 2025, over 11,000 car crashes have been reported, resulting in 147 deaths and 3,200 injuries (Abbarano, 2025). Pedestrian deaths have followed similar patterns in the state, with Washington ranking 26th nationally; there were 395 pedestrian fatalities between 2018 and 2022 (Smart Growth America & National Complete Streets Association, 2024). These injuries and deaths are preventable, yet transportation infrastructure

continues to prioritize personal car use over the safety of people walking, biking, or using public transit (Seattle Department of Transportation, 2023).

Reducing preventable injury is a crucial public health outcome, and the sharp rise in traffic incidents highlights the urgent need for comprehensive TOD. People living in car-dependent communities face four times the per capita traffic fatality rate compared to those living in TOD areas (Litman, 2020). While individual behaviors contribute to these outcomes, the underlying issue reflects a systemic failure to design and fund safer infrastructure for effective transportation systems.

## **Equity**

Inadequate transportation infrastructure disproportionately impacts Black and American Indian/Alaska Native communities, older adults, and people who are low-income (Smart Growth America, n.d.-b). These communities are often forced to spend large amounts of their monthly income on transit or face limited mobility (Freemark et al., 2025; Smart Growth America & National Complete Streets Association, 2024). Infrastructure gaps exacerbate inequities and reduce essential accessibility, especially in historically segregated neighborhoods, shaped by redlining and discriminatory housing policies (Smart Growth America, n.d.-b).

Historically, highway and transportation infrastructure deepened racial segregation – including building on Native lands and constructing highways around Black communities (Litman, 2020; Morrison & Dallman, 2025; Schweninger et al., n.d.). These communities experience continuous underinvestment, resulting in higher traffic fatality rates, shorter life expectancy, and overall poorer health outcomes (Smart Growth America, n.d.-a; Tehrani et al., 2019). Without considering health equity, TOD policies may miss vital opportunities to designate greater investment in these historically under-resourced communities.

Access to safe public transportation can improve health outcomes and narrow the opportunity gap in historically and intentionally excluded communities (Tehrani et al., 2021). Safe and reliable transportation increases access to basic needs and services like healthcare, jobs, and education (Litman, 2020; Morrison & Dallman, 2025; Schweninger et al., n.d.). However, when TOD is implemented without equity considerations, populations can be displaced through gentrification. This displacement can lead to worse health outcomes like lower life expectancy and higher incidents of disease as compared to rates in those who remain in place, defeating the purpose of TOD (Tehrani et al., 2021).

## **Environmental Health**

Vehicle emissions and air pollution amplify the health and equity challenges of current transportation infrastructure. Transportation is one of the leading sources of air pollution. Approximately 90% of fine particulate matter in urban areas is generated by traffic, resulting in health conditions like heart disease, lung cancer, neurological conditions, increased anxiety, cognitive impairments, and more (Miner et al., n.d.; World Health Organization, n.d.). People living in sprawling, car-centered cities face significantly higher exposure to these pollutants compared to compact transit areas.

Across Washington state, historically and intentionally excluded populations face increased exposure to air pollution and often lack access to new transit improvements (Seattle

Department of Transportation, 2023; U.S. Department of Transportation, 2022). Rapid growth and rising housing costs in metro areas like Puget Sound, Spokane, and Vancouver is widening these disparities (Freemark et al., 2025). However, when public transportation is made more accessible in these communities, drivers are more likely to switch to using public transportation. This switch reduces toxic emissions, thereby improving public health outcomes (Eriksson, 2011).

## **TOD & Public Health**

Overall, these data demonstrate how traffic safety risks, access/mobility inequities, and environmental harm collectively necessitate redesigning transit development around public health and equity. The lack of public health focused TOD policy is an issue here in Washington state and nationwide. Cities across the U.S. lag behind other wealthy nations. Despite challenges, Washington state is a leader in traffic safety initiatives, including the Traffic Safety Commission, Target Zero goals, and adoption of the Safe System Approach (Millar, 2024). However, while vehicles are getting safer for passengers, infrastructure that prioritizes cars continues to pose safety concerns for pedestrians, cyclists, and public transit users (Seattle Department of Transportation, 2023). Studies show that when health and transit are considered together, enhancing public transit development is a cost-effective strategy for meeting public health objectives (Litman, 2020). Therefore, investing in well-rounded TOD ensures multiple benefits: safer streets, reduced emissions, and more equitable access to basic needs and opportunities for all Washington communities.

## **Policy Landscape**

### **Stakeholder Analysis**

A stakeholder analysis was conducted to identify those in Washington state with a vested interest in TOD policy. This analysis included state-level agencies, non-profit and advocacy organizations, and elected officials. The level of power and interest of organizations and individuals was assessed based on funding, staffing, community connections, and policymaker influence. These stakeholders primarily focus on transportation and equitable development work, as collected from organization websites, mission statements, and media engagements. These sources were used to assess stakeholders' political leanings and available resources to influence policy (Appendix B).

Stakeholders with the most power and vested interest are elected officials directly involved in the policymaking process, and who supported the most recent TOD bill. Many advocacy and non-profit organizations supporting TOD have medium capacity but generally have low or medium power. Finally, state agencies like WSDOT have limited capacity and resources but significant power and influence over TOD policies. Therefore, upcoming TOD policy should focus on engagement with non-profit/advocacy organizations and elected officials to best leverage existing resources and influence.

### **Policy Context**

TOD is a newer policy concept. In the last Washington state legislative session, the passing of HB 1491 followed multiple failed attempts to pass legislation related to TOD (Washington State Legislature, n.d.-a). In 2023, the first TOD bill was proposed, Senate Bill 5466. This bill was proposed with the intention to "reflect the state's commitment to affordable

housing and vibrant, walkable, accessible urban environments that improve health, expand multimodal transportation options, and include varied community facilities, parks, and green spaces that are open to people of all income levels" (Washington State Legislature, n.d.-d). All three versions of this bill, Senate Bill 5466 (2023), House Bill 2160 (2024), and House Bill 1491 (2025) share these intentions. Another mission of the TOD bills was to maximize the effect of the state's monetary investments in the transit system. Proposed Senate Bill 5466 outlined that 20% of newly built units must be affordable housing. In 2024, House Bill 2160, another TOD bill was proposed; this version lowered the number of required affordable housing units to 10% (Washington State Legislature, n.d.-c).

A separate policy, House Bill 1110, passed in 2023, increasing housing development near transit, but does not explicitly focus on TOD (Municipal Research and Services Center of Washington, n.d.-a). This bill allows denser housing development near major transit stops through leveraging housing ordinances and zoning. Seattle and King County also have their own TOD plans and projects, but no specific policies that require TOD implementation (City of Seattle, n.d.; King County, n.d.).

## Description of Policy Alternatives

### Maintain Status Quo

House Bill 1491, the most recently passed Washington state TOD policy, serves as the status quo for this policy analysis. This bill promotes transit-oriented housing development through increases in the minimum density standards near transit stops to improve housing options and reduce carbon emissions from transit (Futurewise, ). While it addresses housing accessibility, it fails to account for other aspects of public health, such as accessibility to resources, environmental concerns, health equity considerations, and preventable injury. Exemplary policies from other jurisdictions incentivize health and safety measures within transit-related policies.

### Alternative One: Require Complete Streets within TOD Policy

A policy alternative to the status quo is to require a Complete Streets framework within traditional TOD policies, such as HB 1491. The Complete Streets framework can be flexibly applied to policy at any government level. At the state level, policies are influential because they can dictate local action through preemption. The current Washington state TOD policy does not include street safety requirements, as it primarily focuses on residential housing zoning surrounding transit hubs. However, a more holistic TOD project would promote pedestrian-friendly streets with lower traffic speeds, improving safety for the most vulnerable road-user group (Work Bank Group, 2020). The current TOD policy, House Bill 1491, does not include language that requires pedestrian-friendly streets; a gap also identified in interviews with local and state transportation professionals. Therefore, Complete Streets could benefit TOD by making it safer for people to live and travel around transit hubs (Washington State Legislature, n.d.-a).

Washington passed its first Complete Streets policy in 2011, which focused on transportation planning and safety. It encouraged local jurisdictions to adopt their own Complete Streets policies. Multiple Complete Streets policies in Washington have received positive reviews, including those in Battle Ground, Bellingham, Wenatchee, Tacoma, and Ocean Shores (Municipal Research and Services Center of Washington, n.d.-a). However, based on the 2022 state legislature, Complete Streets planning in Washington was only required for urban projects

that cost over \$500,000. Due to budget shortfalls for policy implementation, Complete Streets is now only required for projects over \$1 million (Washington State Department of Transportation, n.d.-a). According to a Smart Growth America analysis, existing local Complete Streets policies are weak. Of four Washington Complete Streets policies passed in 2023, the highest scored policy was awarded 30 out of 100 points across ten criteria from the Complete Streets Policy Framework (Municipal Research and Services Center of Washington, n.d.-a).

In San Antonio, Texas, successful TOD legislation combines land use and transportation safety policies like Complete Streets and Vision Zero (Smart Growth America & National Complete Streets Coalition, n.d.). The first Complete Streets Policy passed in 2011 in San Antonio proved ineffective at reducing traffic and pedestrian fatalities (City of San Antonio, 2011). In 2024, the city passed a new ordinance to update the 2011 plan (Smart Growth America, n.d.). Now, all new developments in San Antonio are required to include Complete Streets planning.

Combining Complete Streets with TOD provides an opportunity to build safe and accessible infrastructure for communities beyond wealthy neighborhoods. Washington state can learn from cities like San Antonio that successfully implemented Complete Streets when creating new state-level legislation. For example, the combination of TOD and Complete Streets policy could be instrumental on Rainier Avenue South in the Puget Sound region or Spokane Division Street in Eastern Washington (Appendix C). These are two regions where state-level TOD policy will be implemented in the coming years. These corridors are regarded as some of the most dangerous streets in Washington and are currently designed to prioritize cars. Addressing preventable injury through prioritizing the safety of pedestrians and cyclists can reduce the number of injuries, deaths, and crashes each year.

### **Alternative Two: Incentivize Equitable TOD (ETOD)**

An alternative policy is the adoption of an equitable TOD policy (ETOD). According to the Metropolitan Planning Council, ETOD “advocates that people of all incomes experience the benefits and consequences of dense, mixed-use, pedestrian-oriented development near transit hubs” (Metropolitan Planning Council, n.d.-b). Unlike standard TOD policy, ETOD uses an equity framework to holistically improve the livability and overall wellbeing of residents by focusing on historically and currently underserved neighborhoods. Implementing ETOD policy makes public transportation and housing more affordable to prevent displacement, saves residents money, reduces carbon emissions, and mitigates other negative environmental impacts from car dependence.

Major elements of ETOD include (Schilling et al., 2024):

- Proximity to reliable and safe public transportation systems through improved street crossings and station access. ETOD developments that require housing within walking distance (half a mile) to transit, can connect community members to essential services through access to multiple public transit lines, and increase access to varied employment, education, and medical care options (TriMet, n.d.).
- A mixed-income housing design to serve all types of families in one building, including people who have experienced chronic homelessness. This can be supported through multifamily housing development overlay zones that increase housing density while maintaining affordability (Butler, 2022).

- Opportunities for intentional design to encourage small business creation, like the inclusion and retrofitting of retail space in a new Connecticut TOD Project, that provides support for relevant business and services for the community (WSP, 2018).
- Support for anchor facilities through strategies like tax increment financing, that support grocery stores, schools, libraries, pharmacies, and childcare centers (Municipal Research and Services Center of Washington, n.d.).
- Safe and intentionally designed infrastructure informed through community engagement and input like community impact assessments. Improvements could include play spaces, bike lanes, safe sidewalks, green spaces, and more.

Traditional TOD efforts can lead to less housing affordability, higher rates of gentrification, and greater displacement, while ETOD aims to maximize TOD benefits for low-income residents and local businesses. Without an explicit equity framework guiding TOD implementation, lower-income community members can become displaced and have less access to transit and needed resources (Metropolitan Planning Council, n.d.). Research from Harvard University found that how easily a person could get to work was the most impactful factor in determining if they could escape the poverty cycle (Chetty et al., 2014). To achieve equitable TOD outcomes, cities need to develop collaborative, cross-sector partnerships and involve community members directly in planning processes and decision-making (Metropolitan Planning Council, n.d.).

Although ETOD policies will require substantial investment, successful implementation in other states demonstrates that these policies are effective in addressing multiple facets of public health. Data from the American Public Transit Association and the Chicago Metropolitan Planning Council points to public transit saving up to \$10,000-\$13,000 per year in household transportation costs based on gas prices, auto costs, and public transit fares (APTA, 2023). Additionally, ETOD increases access to 24-50% more jobs (particularly for low-income residents), household emissions up to 78% lower in transit and pedestrian friendly areas, and retail sales up to 88% higher in transit and pedestrian friendly areas (Metropolitan Planning Council, n.d.).

Chicago first implemented a comprehensive TOD policy plan in 2020, but in 2022, adopted the Connected Communities Ordinance, making several changes to zoning codes to produce more equitable neighborhoods around transit stations. This revision required new housing projects to include more affordable units in high-income and gentrifying neighborhoods. It also limited the number of parking spaces required for new projects, reducing development costs.

Austin, Texas also recently completed an equitable TOD policy plan to provide new economic opportunities for all residents with the city's new transit system (Schilling et al., 2024b). This plan identifies the areas where residents risk displacement to identify interventions that support affordable housing near public transportation (Schilling et al., 2024b). It also intentionally includes BIPOC communities, which are the most impacted by displacement historically and currently, in the planning processes.

## Analysis Criteria

Policy alternatives were evaluated using a set of ten criteria (Appendix D). The first four criteria included:

1. **Effectiveness:** How successful will this policy be in creating safer TOD?
2. **Cost:** How much will this policy cost to implement?
3. **Political feasibility:** How likely is this policy to gain support from lawmakers given the political context?
4. **Health impact:** To what extent will the policy protect public health and wellbeing?

Policy options were further evaluated against six criteria derived from the ETOD framework. An adapted version of The Alliance’s “Equitable Development Principles and Scorecard” was used to evaluate alternatives based on how the policy would repair past harms and create more inclusive communities (The Alliance Advancing Regional Equity, 2022). Our selected ETOD framework criteria include housing, environment and sustainability, community power, economic development, transportation, and livability.

This complete set of ten criteria was used to score and rank each policy option to inform future recommendations. These policies were evaluated based on findings from a combination of peer reviewed literature, governmental/non-governmental agency reports, legislative testimonies, and information gleaned from key informant interviews. The key informant interview guide aligned with our evaluation criteria to get firsthand insights, particularly around potential policy efficacy.

## Analysis of Alternatives

Policy alternatives were compared to the current status quo of Washington State TOD policy, HB 1491. All policy options were scored using the criteria described above, and summary scores were compiled into a side-by-side table (Appendix E).

### Analysis of Status Quo: HB 1491

**Pros.** HB 1491 provides a solid baseline framework for the state to increase affordable housing around transit hubs. This new mandate will make accessing transit more feasible and reduce displacement and gentrification that often result from transit hub investment. This new bill establishes a timeline for TOD development, provides specific guidelines on the percentage of affordable housing units, and includes multi-family housing property tax incentives and grant funding to support implementation through utility improvements and planning costs (Futurewise, 2025b). Although health is not a primary focus of this policy, it may have indirect health benefits by increasing active transportation connections, decreasing personal car use, and improving access to basic needs.

**Cons.** Although HB 1491 increases access to affordable housing near public transit, it does not explicitly integrate or mandate consideration of other public health factors for developers. This policy does not mandate specific safer design features, including sidewalks, bike lanes, or other active transportation infrastructure expansion (Washington State House of Representatives Office of Program Research, 2025). One key informant from a Seattle transit agency shared, “We invest billions in expanding transit, but we don’t allocate enough funding to make sure people have equitable, safe, convenient access.” Additionally, the bill does not

directly promote increases in job opportunities or business growth near transit hubs. Supported by multiple local transit stakeholders, one key weakness of this policy is the lack of community input and engagement during planning and implementation, which may result in higher rates of displacement and gentrification.

### **Analysis of Alternative One: TOD and Complete Streets**

**Pros.** The city of San Antonio's Complete Streets policy is a nationally recognized model. The city's first Complete Streets policy passed in 2011, but an updated Complete Streets Policy and Vision Zero Action Plan was adopted as part of the 2025 City Council budget (AARP Texas, 2025). This new policy falls under San Antonio's Transit-Oriented Policy framework and complements a new TOD zoning code that will facilitate the development of walkable, mixed-use communities (SASpeakUp, 2025). A strength of the San Antonio Complete Streets ordinance is its inclusion of community input for planning, implementation, and evaluation. The San Antonio Complete Streets Coalition, a local group composed of multi-disciplinary Complete Streets champions, worked closely with San Antonio's Transportation Department to update the 2011 policy (ActivateSA, n.d.). The revised policy focuses on safety, public transportation, diverse user needs (cars, bikes, buses, pedestrians), green infrastructure, and extreme weather considerations (City of San Antonio, 2024). A project prioritization tool will be used to decide which projects need to be completed first, taking equity into consideration. Another strength is that the policy outlines a Standing Transportation Committee to advise DOT implementation, as well as a Technical Review Taskforce to ensure inter-agency collaboration across city government. This task force is important for applying a holistic approach to development – taking housing, transportation, environment/sustainability, economic growth, and equity into consideration. The San Antonio policy is also adaptable, meaning that it can be tailored based on community needs as they change over time (City of San Antonio, 2024).

**Cons.** While the new Complete Streets policy is politically feasible and effective at building safer streets into TOD, it is a broad policy that may be difficult to implement. A con of San Antonio's policy is that it will require substantial funding sustained over a long period of time. The city budget allocated \$3.5 million for the first year of implementation. A separate, though closely aligned, San Antonio Bike Network Plan could require between \$3-8 billion over the next 25 years to implement (Biediger, 2025). Investing in large infrastructure changes will be costly and slow.

Another challenge with broad policies like those that apply the Complete Streets framework is creating language that is clear and enforceable, yet flexible enough to adapt to the specific needs of different neighborhoods and populations. Specific incentives and/or enforcement mechanisms are not clearly outlined (City of San Antonio, 2024). The policy does mention that permitting will be used to ensure public safety and mobility during construction phases (i.e., providing detour routes that are accessible). However, construction will place a large burden on communities and small businesses due to noise pollution, street and sidewalk closures, etc. (City of San Antonio, 202 C.E.), 2025).

Finally, like any large public infrastructure investment, Complete Streets may have the unintended consequence of displacing current residents by raising costs on nearby land and housing. The San Antonio policy mentions a call for the city to "thoroughly consider measures to preserve housing affordability and increase new affordable housing options, tying land use and

transportation planning together” in order to combat this consequence (City of San Antonio, 2024). However, this language may not be specific enough to be tightly enforced.

### **Analysis of Alternative Two: Equitable TOD (ETOD)**

**Pros.** The city of Chicago’s Connected Communities Ordinance (CCO), passed in 2022, was developed to implement Chicago’s equitable TOD policy plan (City of Chicago, n.d.). The ordinance allows for zoning code changes to produce more equitable neighborhoods surrounding transit hubs (Schilling et al., 2024). The ordinance expands TOD incentive eligible areas within a half mile of a Chicago Transit Authority or Metra rail station, and within 1,300 feet of high-frequency bus routes (Chicago Cityscape, n.d.). This expansion has significant benefits for the South and West sides of Chicago, which have been historically excluded from TOD development, but will now experience the benefits of intentional TOD that is flexible in its implementation to meet community needs (Tiongson et al., n.d.).

A strength of CCO is that it prioritizes pedestrian and active transportation friendly infrastructure, such as safer street crossings and limited car-centered design features (*Connected Communities Ordinance Fact Sheet*, 2022). These features reduce traffic fatalities, increase green space around transit hubs, and increase neighborhood social cohesion. The new ordinance boosts the local economy by encouraging mixed-use retail and housing by relaxing more restrictive zoning policies and lifting parking lot construction requirements. The density and development affordability incentives support neighborhood retail and services expansion, creating new jobs, and reducing household transit costs (Metropolitan Planning Council, n.d.-a; Tiongson et al., n.d.). Finally, CCO and ETOD policies increase community climate resilience by expanding low-emission transportation options and promoting efficient, low-carbon land-use development (Chicago Mayor Lori E. Lightfoot, 2022).

An additional strength of CCO is its embedded mandates for community engagement. The implementation is guided by public engagement on zoning changes and a designated ETOD working group with representation from residents and local community organizations (Elevated Chicago, n.d.). The intentional integration of engagement ensures that community voices continue to drive development priorities to serve community needs.

**Cons.** Despite its strengths, CCO brings some challenges. Although the political feasibility was high during policy approval but is overall modest in the analysis due to competing developer interests, variable policy monitoring, and unclear accountability structures (O’Connor, 2023). Housing affordability and displacement remain significant concerns with this policy. Displacement is driven by high property values near transit fueling gentrification despite equity safeguards such as mixed-income housing incentives and anti-displacement provisions (Tiongson et al., n.d.).

Another barrier to ETOD success is maintaining consistent, intentional community engagement. Participation often varies depending on community capacity, which can inadvertently marginalize and exclude the very communities the policy seeks to support (*Connected Communities Ordinance Fact Sheet*, 2022). While CCO aims to improve overall livability, health, and transit access, incorporating intentional community involvement and managing the complex cross-agency coordination for effective long-term implementation requires a significant investment in sustained community voice and additional monitoring and targeted supports to achieve CCO’s equity outcomes (Tiongson et al., n.d.).

## Policy Recommendations

To make TOD policies more comprehensive in Washington, policies should move towards requiring ETOD frameworks and incorporating the safety aspects of Complete Streets into existing policy, such as HB 1491. Due to Washington state's current financial constraints, we have outlined more feasible short-term recommendations, along with longer-term recommendations that require more substantial planning and resources.

### Short-term recommendations

We recommend identifying and connecting non-profit and governmental organizations currently working in TOD to start a coalition as a feasible first step to highlight existing community resources, streamline existing projects, decrease siloes, and promote cross sector collaboration. Interviewees mentioned a disconnect between organizations like King County Metro, Sound Transit, Public Health Seattle & King County, and the Seattle Department of Transportation. A coalition would allow for better communication and understanding of TOD work across agencies, which could increase capacity for implementing ETOD.

Additionally, we recommend creating a community advisory board, based on community engagement efforts in San Antonio and Chicago, to co-create policy with coalition members. One interviewee mentioned that community engagement needs to become an intentional part of the planning process. In the creation of the advisory board, we recommend that roles go beyond advising and that individuals get to be a part of decision-making and planning for TOD implementation. This would allow for community and neighborhood-specific contributions to this group. TCC, along with other organizations working on TOD, can advocate for requiring elements of ETOD into state and local policy using clearer guidelines and incentives.

### Long-term recommendations

When more state financial resources are available, we recommend creating a state-level equity-based prioritization plan to implement TOD in areas that have been historically overlooked and where communities express a need for safer, mixed-use infrastructure. We also recommend that the coalition prioritize community-led [health equity racial impact assessments](#) related to transit access, environmental health, safety, and TOD infrastructure, that can be used to inform the prioritization plan. Because of current limitations in the collection and dissemination of holistic public health indicator data alongside TOD implementation, we recommend that TCC partner with transit agencies that manage datasets of these public health metrics within TOD corridors. Through this data-sharing partnership, TCC or another agency could create and maintain one data hub/dashboard. This dashboard would compile public health metrics across transit corridors and be used as a TCC advocacy tool for equity-centered planning. It would also streamline evaluation of TOD projects to better understand intended and unintended consequences following implementation.

We also recommend moving towards incorporating ETOD frameworks into all TOD policies, especially surrounding affordability, density, and walkability. TCC can work with other organizations to advocate for incorporating the ETOD framework into TOD policy through city ordinances. This includes mandating affordable mixed-income housing by transit hubs, ensuring pedestrian and cyclist-friendly streets, and compact development that connects people to transit, commerce, resources, and healthcare. TCC could advocate for funding through the Seattle Transportation Levy, using the \$7.5 million Equitable Implementation Initiative as a policy lever

(Seattle Department of Transportation, n.d.). While it requires an initial financial investment, the evaluation of eTOD implementation in Chicago shows that it can boost the economy by promoting local businesses near transit stations and increasing access to jobs (Metropolitan Planning Council, n.d.-a).

One way of applying the ETOD framework is to support anchor facilities like grocery stores and schools. This can be done on a policy level by using strategies like tax increment financing. In tax increment financing, increases in property tax value are allocated towards paying for the public improvement costs, such as anchor facilities near transit hubs (Municipal Research and Services Center of Washington, n.d.-b). Increased collaboration between transportation organizations, prioritization of historically marginalized communities, and the creation of safer infrastructure for pedestrians and cyclists are all tangible ways to strengthen the connection between TOD and public health.

## Conclusion

There is a current gap in Washington state TOD policies that limit the potential public health impact of this urban planning framework. The goal of this analysis was to examine ways that broad public health indicators (i.e., housing, transportation access, environment, safety) can be included within TOD. While Washington state is currently in the implementation phase of House Bill 1491, there are ways that transit agencies and local governments could improve upon listening to community voices, ensuring safe infrastructure, and prioritizing equitable implementation. To do this, we recommend the creation of a community advisory board, the creation of a coalition among non-profit and governmental organizations, a state-level and equity-based prioritization plan, the creation of a data hub/dashboard, and advocating for incorporating the ETOD framework into all Washington TOD policies. Together, these strategies can help Washington move towards a more holistic, equitable, and community-centered TOD framework that advances public health efforts.

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## Appendices

## Appendix A. Key informant interview guide

Primary Questions	Follow-Up Questions
1. In your professional experience, what ways have you seen TOD impacting communities where it has been implemented?	<p>Have you seen TOD impacting public health outcomes, if at all, in corridors where it is implemented?</p> <p>I.e., Crash reduction? Speed management? Mode shift? Vision Zero/Target Zero implementation?</p>
2. How have community voices been included/excluded in the TOD planning process?	Any specific community partners/stakeholders?
3. What are the current strengths and barriers of TOD implementation in Washington state?	<p>What can we leverage to make TOD policies more oriented towards public health outcomes in Washington state?</p> <p>What exists in the community to make a TOD policy more feasible?</p> <p>I.e., Funding, coordination, approvals, fragmented governance?</p>
4. Do you track or recommend specific indicators or data sources that show TOD health outcomes?	Where do you think the biggest gaps in data or measurement are for TOD health outcomes?
5. What would you like to see improve for Washington state TOD policies?	<p>What do you think are next steps for TOD improvement?</p> <p>I.e., Policies to increase street safety, walkability, access to affordable housing, improved air quality?</p> <p>Are there any examples of successful policies from other states?</p>
Closing: Thank you so much for your time. Do you have recommendations for us surrounding further research or contacts we should be talking to for our policy analysis?	

## Appendix B. Stakeholder Analysis

Stakeholder	Characteristics	Interest in/motivation/desired outcome	Position on issue & strength (Strong/weak support, neutral, opposed)*	Capacity & resources (high/med/low)	Possible strategies to address interests	Power (high/med/low)**
<b>STATE LEVEL STAKEHOLDERS</b>						
<b>WA State Dept. of Transportation</b>	State Government Agency	Mission is to provide safe, reliable and cost-effective transportation to support people and businesses	Neutral	Low	Partnerships	High
<b>WA Traffic Safety Commission</b>	State Government Agency	Committed to reducing traffic injuries and fatalities	Neutral	Low	Political influence, state partnerships	High
<b>DOH Injury and Violence Prevention</b>	State Government office	Public health programming focused on safety	Neutral	Low	Partnerships, research to inform policy	High
<b>WA State Dept. of Commerce</b>	State Government Agency	Manages grant program to assist cities in implementation of HB1491	Neutral	Low	Partnerships, funding	High
<b>NON-PROFITS, COALITIONS, ADVOCACY ORGANIZATIONS</b>						
<b>Futurewise</b>	Non-Profit	Advocates for land-use policies to promote health, equity, and sustainability	Strong support	Medium	Advocacy	Low
<b>Hopelink</b>	Non-profit	Transportation, housing, family, services to low-income families in King/Snohomish counties	Strong support	Medium	Community partnerships, advocacy	Low
<b>Blue Mountain Action Coalition (BMAC)</b>	Advocacy coalition	Promotes rural mobility, health, and equitable development in Southeastern WA	Strong support	Medium	Community action tools, Eastern WA partnerships	Low
<b>Front and Centered</b>	Non-Profit, BIPOC-led	Environmental justice focused policy agenda	Strong support	Medium	Coalition building, grant money to support community orgs	Low
<b>AAA Foundation for Traffic Safety</b>	Non-profit	Research and education organization dedicated to saving lives by preventing traffic crashes	Strong support	High	Research, partnerships	High
<b>Urban Institute</b>	Think Tank	Analyze solutions to create thriving communities	Strong support	Medium	Rigorous analysis, collaboration network	Medium
<b>Housing Development Consortium Seattle-King County</b>	Advocacy group	Advocates for the development and preservation of affordable housing	Strong support	Medium	215 member organizations	Medium
<b>Target Zero Coalition</b>	Safety Coalition	Coalition focused on traffic safety	Strong support	Medium	Advocacy and education tools	Low

ELECTED OFFICIALS & INDIVIDUALS WITH VESTED INTEREST						
<b>Rep. Julia Reed</b>	Legislator who sponsored HB 1491	Member of House Transportation and Housing Committees	Strong support	High	Relationships from HB-1491 advocacy work	High
<b>Rep. Adison Richards</b>	Legislator who sponsored HB 1491	Member of House Transportation and Housing Committees	Strong support	High	Relationships from HB-1491 advocacy work	High
<b>Rep. Cindy Ruy</b>	Legislator who sponsored HB 1491, focus on resiliency, community development	Member of House Technology, Economic Development and Veterans Committee	Strong support	High	Relationships from HB-1491 advocacy work	High

## Appendix C. Priority Washington Corridors and TOD Opportunities

For this project, we selected two highly trafficked transit corridors in different regions of Washington state. These included Rainier Avenue South in the Puget Sound region and Division Street in Spokane. These two corridors are currently highly car-dependent and rank low when it comes to traffic and pedestrian safety. Both regions are slated for TOD implementation in the upcoming years under House Bill 1491. Therefore, we chose to look closer at the current status of these corridors through holistic public health indicators related to housing, transportation, equity, and environmental health.

### Rainier Avenue South

Rainier Avenue South is one of the busiest and most dangerous roadways in King County, WA.



Figure 1. Map of Rainier Avenue South

This road sees an average of 20,000 cars per week (Deshais, 2025) (Deshais, 2025). People living along the roadway are frustrated by frequent crashes into parked cars and homes. One resident reported that four vehicles crashed into her home in 2025 alone (Deshais, 2025). South Seattle residents recently formed a coalition to advocate for city action and traffic control measures. However, the roadway is complex as it passes through Renton, the unincorporated Bryn Mawr-Skyway, and Seattle, leaving major inconsistencies in traffic control measures (Deshais, 2025).

#### TOD within the Rainier Avenue South Corridor.

While there are ongoing TOD efforts to improve safety and public transit

access along Rainier Ave South, these efforts are disjointed due to the many different jurisdictions that control the roadway (City of Renton, City of Seattle, and the unincorporated area of Bryn Mawr Skyway). One exemplary TOD effort within the corridor is the City of Renton's TOD plan for the rapid bus line and transit center at the junction of Rainier Ave S and S Grady Way (City of Renton, n.d.). The plan includes mixed-use development, improvements to multimodal transportation, and improved pedestrian walkways.

**Table 1.** Public Health Indicators and Outcomes for Rainier Ave South

Indicator	Measure	Data source	Quantitative Statistic
Traffic safety	Annual motor vehicle crashes	<a href="#">SDOT collisions</a>	16 crashes since 2020*
Affordability	Median value of owner-occupied housing units	<a href="#">Census reporter</a>	<b>Zip code 98118</b> - \$746,400 <b>Zip code 98178</b> - \$628,200
Displacement	Combined: socio-demographics, transportation quality, neighborhood characteristics, housing, civic engagement	<a href="#">Puget Sound Regional Council Displacement Risk Mapping Tool</a>	<b>High risk</b> (majority of corridor -Seattle and Renton regions), <b>Moderate-lower risk</b> (Bryn-Mawr region of corridor)
Environment	Air quality	<a href="#">Health Disparities Map</a>	<b>Diesel Exhaust PM2.5:</b> Rank 8-10 (high) <b>PM2.5 Concentration:</b> Rank 5-6 (medium)
Access to transit	Available transit options	<a href="#">WSDOT - Transit Routes</a> <a href="#">King County Metro</a>	Public transit <ul style="list-style-type: none"> <li>• Bus routes 7, 9, 106, 987</li> <li>• Light rail – Mt. Baker stop</li> </ul>
Transit utilization	Transportation to work (mean travel time and mode of transportation)	<a href="#">Census reporter</a>	<b>98118 – 31 minutes.</b> 45% driving alone, 16% using public transit, 1% biking, 1% walking, 37% other.  <b>98178 – 31 minutes.</b> 61% driving alone, 9% using public transit, 1% biking, 0% walking, 29% other.

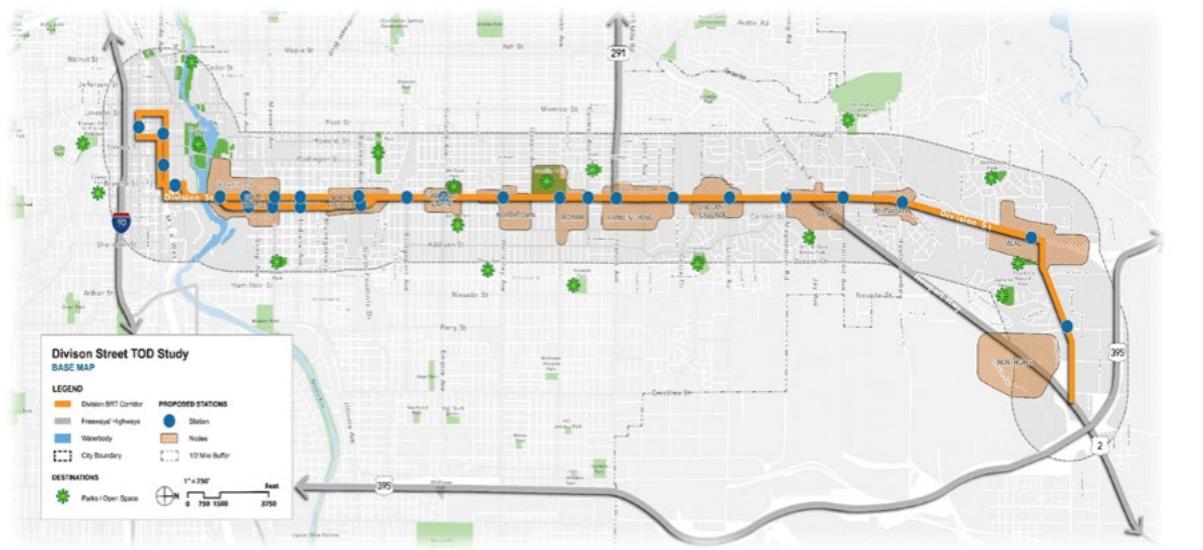
\* Residents report this statistic is a major underestimate and that there were 17 serious crashes in the first six months of 2024 (Deshais, 2025).

## Division Street, Spokane, WA

Division Street corridor is one of the busiest streets in Spokane, with a long history of transit from streetcars to bus routes. It is an important north-south roadway that handles around 50,000 cars a day (City of Spokane, 2025). Division Street connects community members to a variety of neighborhoods, schools, and businesses, and serves as a main connector to highways like US 2 and US 395 (Spokane Transit, n.d.-a). This corridor is also used by bus route 25, which is used annually by over a million riders (Spokane Transit, n.d.-b). Due to its critical role in transit mobility for the Spokane community, the Division Street corridor is slated as a new location for Transit-Oriented Development, enhancing public transit frequency along the corridor, increasing mixed-use buildings, developing more public spaces, and promoting overall sustainable development (City of Spokane, 2025).

**TOD within the Division Street Corridor:** The upcoming corridor improvements are a collaborative effort between the City of Spokane, Spokane County, and the Transit Authority. The project began in October 2024 and builds on previous work done to align zoning rules, land use, and infrastructure needs in upcoming city transit initiatives (City of Spokane, 2025). The Division Street TOD project incorporates community input to identify key nodes along the corridor to target infrastructure improvements based on community needs. This important TOD effort seeks to make Spokane communities more accessible, improve quality of life, and reduce dependence on personal cars (Spokane Transit, n.d.-b).

**Figure 2.** Map of Division Street in Spokane, WA Source: City of Spokane, 2025



**Table 2.** Public Health Indicators and Outcomes for Division Street

Indicator	Measure	Data source	Quantitative Statistic
Traffic safety	Annual motor vehicle crashes	<a href="#">Spokane Crash Statistics</a> <a href="#">Common Accident Locations in Spokane</a>	High-Risk Intersections since 2017: <ul style="list-style-type: none"> <li>Division and Francis- 42 injured</li> <li>Division and Lincoln- 38 injured and one died</li> <li>Division and Wellesley- 38 people injured</li> </ul> Annual Accidents: <ul style="list-style-type: none"> <li>Division and Sprague- <a href="#">120</a> annual accidents</li> </ul>
Affordability	Median value of owner-occupied housing units	<a href="#">Census Reporter</a>	<b>Zip code 99202-</b> \$268,700 <b>Zip code 99201-</b> \$259,800
Displacement	Combined: socioeconomic status, household composition, minority status, housing type/transport	<a href="#">Displacement Risk Assessment</a>	<b>High risk for displacement-</b> Between .77 to .96 percentile to the East of Division St.
Environment	Air quality	<a href="#">Health Disparities Map</a>	<b>Diesel Exhaust PM2.5:</b> Rank 9 (high) <b>PM2.5 Concentration:</b> Rank 9 (high)
Access to transit	Available transit options	<a href="#">Spokane Bus Route Report</a> <a href="#">Spokane Bike Routes</a>	<b>Public Transit-</b> Bus Route 25 <ul style="list-style-type: none"> <li>Annual Passenger Boardings-916,504 people</li> </ul> <b>Active Transit-</b> Class X: Bikes Prohibited
Transit utilization	Ridership	<a href="#">Census Reporter</a>	<b>99202- 16.4 minutes</b> 59% driving alone, 3% using public transit, 0% biked, 8% walked, 29% other*  <b>99201- 19.4 minutes</b>

			61% driving alone, 11% using public transit, 3% biked, 6% walked, 19% other
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## Appendix C References

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## Appendix D. Policy Evaluation Criteria

Criteria	Definition and Scoring Scale
Effectiveness	<p><i>How successful will this policy be in creating safer TOD?</i></p> <p>1 = Minimally effective 2 = Moderately effective 3 = Very effective</p>
Cost	<p><i>How much will this policy cost to implement?</i></p> <p>1 = High costs 2 = Moderate costs 3 = Low costs</p>
Political feasibility	<p><i>Given the political context, how likely is this policy to gain support?</i></p> <p>1 = Low feasibility 2 = Moderate feasibility 3 = Very feasible</p>
Health impact	<p><i>To what extent will the policy protect public health and wellbeing (i.e., increase access to healthcare, healthy food, and green space)?</i></p> <p>1 = Little to no consideration 2 = Moderately addresses 3 = Effectively addresses</p>
<b>Equity Criteria</b>	
Housing	<p><i>To what extent does this policy promote access to safe, affordable, quality housing – minimizing displacement and gentrification?</i></p> <p>1 = Not addressed 2 = Minimally addressed 3 = Fully and effectively addressed</p>
Environment and sustainability	<p><i>To what extent does this policy protect the community's land, water, and air – promoting and regenerating the health of the people and place?</i></p> <p>1 = Not addressed 2 = Minimally addressed 3 = Fully and effectively addressed</p>
Community power	<p><i>To what extent does this policy engage community members and connect with leaders of groups who have been historically excluded from planning?</i></p> <p>1 = Not addressed 2 = Minimally addressed 3 = Fully and effectively addressed</p>
Economic development	<p><i>To what extent does this policy prevent displacement of residents/small businesses while building stronger local economies?</i></p> <p>1 = Not addressed 2 = Minimally addressed 3 = Fully and effectively addressed</p>
Transportation	<p><i>To what extent does this policy increase access to safe and convenient pedestrian, bicycle, bus, rail, and/or zero emission car sharing systems?</i></p> <p>1 = Not addressed</p>

	<p>2 = Minimally addressed 3 = Fully and effectively addressed</p>
Livability	<p><i>To what extent does this policy account for past harms while promoting inclusion, and puts focus on community wellness and power?</i></p> <p>1 = Not addressed 2 = Minimally addressed 3 = Fully and effectively addressed</p>

## Appendix E. Side by Side Scorecard of Policy Options

Criteria	HB 1491: Score (1-3) and Rationale	Complete Streets: Score (1-3) and Rationale <sup>1</sup>	ETOD: Score (1-3) and Rationale
<b>Effectiveness</b>	<b>Score: 2</b> <ul style="list-style-type: none"> <li>Increases affordable housing development capacity around transit stations, which may be effective in creating safer TOD by increasing transit access, but does not explicitly focus on safety</li> </ul>	<b>Score: 3</b> <ul style="list-style-type: none"> <li>Projected to be effective due to alignment with national gold standards for Complete Streets, however this policy has not been fully implemented or evaluated yet</li> <li>Policy includes a Design Guide to set clear standards and outlines performance metrics</li> <li>Clearly defines exemptions and exemption processes</li> <li>Will offer trainings once/fiscal year for staff and public to build capacity</li> </ul>	<b>Score: 3</b> <ul style="list-style-type: none"> <li>Guidelines and requirements to promote safety for active transportation (bikes, pedestrians) and required ADA considerations</li> <li>De-priorities care-centric development like curb cuts and driveways near stations</li> <li>Mandates new developments must prioritize pedestrian safety</li> </ul> <p>(City of Chicago, 2023; <i>Connected Communities Ordinance Fact Sheet</i>, 2022)</p>
<b>Cost</b>	<b>Score: 2</b> <ul style="list-style-type: none"> <li>Includes an infrastructure grant through the DoT (covers utilities like water, sewer, stormwater) and a 20 year property tax exemption for multi-family affordable housing developments (Futurewise, 2025b)</li> <li>Offers support for funding station</li> </ul>	<b>Score: 1</b> <ul style="list-style-type: none"> <li>Expensive</li> <li>City Council allocated \$3.5 million to start work on the plan in the 2025 budget</li> <li>Will require \$3-8 billion for bike lanes alone over the next 25 yrs</li> <li>However, Complete Streets can provide a 10:1 return on investment</li> </ul>	<b>Score: 2</b> <ul style="list-style-type: none"> <li>Moderately expensive for developers</li> <li>Promotes long-term cost savings</li> <li>Reduces some development costs through reduced mandatory parking requirements, adds incentives for affordable housing construction</li> <li>Developers can save \$29,000 per above-</li> </ul>

	area planning costs	(Biediger, 2025; City of San Antonio, 2024)	<ul style="list-style-type: none"> <li>ground parking space not built</li> <li>City of Chicago has committed \$800 million to support 18 ETOD projects. Overall, costs citywide are very limited.</li> </ul> <p><i>(Connected Communities Ordinance Fact Sheet, 2022).</i></p>
<b>Political feasibility</b>	<b>Score: 3</b> <ul style="list-style-type: none"> <li>Feasible</li> <li>Passed and includes compliance deadlines for cities within Central Puget Sound region no later than December 2029 (Washington State Legislature, n.d.-b)</li> </ul>	<b>Score: 3</b> <ul style="list-style-type: none"> <li>Feasible, passed and currently in implementation phase</li> <li>Policy includes education for city staff and community on best practices to improve understandings and boost support</li> <li>Partners with outside groups including private developers and state DOT</li> </ul>	<b>Score: 3</b> <ul style="list-style-type: none"> <li>Feasible, passed unanimously by City Council</li> <li>Developed with community partners and coalition input</li> <li>Includes flexibility for development to be responsive to diverse community needs</li> </ul> <p>(Norris, 2023)</p>
<b>Health impact</b>	<b>Score: 2</b> <ul style="list-style-type: none"> <li>Increases housing affordability, family-sized units, and higher density housing near transit hubs, which indirectly could improve access to healthcare, green spaces,</li> <li>Could encourage physical activity through improving walkability near transit hubs</li> </ul>	<b>Score: 3</b> <ul style="list-style-type: none"> <li>Embeds Vision Zero within plan to boost holistic roadway safety for all users</li> <li>Encourages physical activity (walking, biking) which helps prevent diabetes, heart disease, and strokes</li> <li>Builds social connection</li> <li>Health impact assessments will be</li> </ul>	<b>Score: 3</b> <ul style="list-style-type: none"> <li>Supports significant health improvement by encouraging more physical activity, safer design to improve traffic safety, and improves access to public transit (Metropolitan Planning Council, n.d.-a).</li> <li>Provides developer incentives to create one or more ground floor accessible units</li> </ul>

	<ul style="list-style-type: none"> <li>Public health elements of this bill are limited</li> </ul>	used to evaluate health effects	<ul style="list-style-type: none"> <li>for people with disabilities</li> <li>Informed by the Health Racial Equity Impact Assessment and ETOD working group, centering public health and community wellbeing (Chicago Mayor Lori E. Lightfoot, 2022)</li> </ul>
<b>Summary scores of equity criteria</b>			
<b>Housing</b>	<b>Score: 3</b> <ul style="list-style-type: none"> <li>Requires affordable housing units in new developments, and the affordability requirements must be maintained for at least 50 years (Futurewise, 2025b)</li> <li>Need to meet one of the following requirements: <ul style="list-style-type: none"> <li>- At least 10% of housing units must be rental housing affordable to families making 60% or less of AMI</li> <li>- At least 10% must be affordable to families making 80% or less AMI; or</li> <li>- At least 20% of units must</li> </ul> </li> </ul>	<b>Score: 2</b> <ul style="list-style-type: none"> <li>Policy mentions protections for housing affordability; however, this is not a main focus, and clear regulations are not included</li> <li>Within a year, the city must amend the Unified Development Code to ensure private developers comply with Complete Streets framework</li> <li>Significant public investment can increase land/housing value, gentrification, and displacement. Will measure changes in housing costs to mitigate unintended consequences</li> <li>City must collaborate with Neighborhoods and Housing Services to</li> </ul>	<b>Score: 3</b> <ul style="list-style-type: none"> <li>Promotes affordable, mixed-income, accessible housing options near transit that meet specific community needs</li> <li>Requires developers receiving TOD incentives to build above the current required number of affordable units</li> <li>Allows for three-flats, the most affordable type of housing, to be built near transit hubs and protects from deconversions in neighborhoods experiencing low-affordability</li> <li>Allows for 29% of target areas of the city that previously did not qualify for parking minimum reductions to now have density boosts</li> </ul>

	be rental housing units affordable to families making 80% or less AMI	preserve housing affordability	(Connected Communities Ordinance Fact Sheet, 2022)
<b>Environment and sustainability</b>	<b>Score: 2</b> <ul style="list-style-type: none"> <li>Increases high density areas for housing and encourages use of public transit systems that reduces carbon emissions</li> <li>Does not include explicit mandates for alternative land use and active transportation design</li> </ul>	<b>Score: 2</b> <ul style="list-style-type: none"> <li>Includes nature in design – increasing green spaces, decreasing heat islands, and accounting for extreme weather events (flooding, heat, hail)</li> <li>Mitigates storm water run off</li> <li>Will monitor air quality index levels</li> </ul>	<b>Score: 3</b> <ul style="list-style-type: none"> <li>Prioritizes low emission transportation methods including rolling, walking, biking, and public transit</li> <li>Expands opportunities to expand community climate resilience through increased green space, stormwater management, and use of renewable energy</li> </ul>
<b>Community power</b>	<b>Score: 1</b> <ul style="list-style-type: none"> <li>No specific community engagement recommendations or mandates within this policy</li> </ul>	<b>Score: 3</b> <ul style="list-style-type: none"> <li>Built out a coalition of Complete Streets champions – used consensus among community members and partners</li> <li>Will track community engagement efforts to ensure low-income, communities of color and low vehicle ownership neighborhoods are included in planning</li> </ul>	<b>Score: 3</b> <ul style="list-style-type: none"> <li>Extensive engagement of historically excluded communities in ordinance development</li> <li>The City of Chicago ETOD Working Group guides ongoing work, implementation and recommendations</li> </ul>
<b>Economic development</b>	<b>Score: 2</b>	<b>Score: 2</b>	<b>Score: 3</b>

	<ul style="list-style-type: none"> <li>• Mandates affordable housing in areas that are high demand, which may decrease displacement</li> <li>• No specifics listed in terms of promoting business incentives and job opportunity increases</li> </ul>	<ul style="list-style-type: none"> <li>• Boosts employment levels, property values, brings in investment from the private sector, and new businesses.</li> <li>• Increases mobility and ensures access to business</li> </ul>	<ul style="list-style-type: none"> <li>• Addresses inequitable economic growth in South and West Chicago by extending incentives to all corridors with high frequency bus routes</li> <li>• Estimated creation of approximately 50,000 direct and indirect jobs annually</li> <li>• ETOD saves up to \$10,000 per year on household transportation costs (Tiongson et al., n.d.)</li> </ul>
<b>Transportation</b>	<p><b>Score: 3</b></p> <ul style="list-style-type: none"> <li>• The core motivation behind HB 1491 is to encourage dense housing near areas by the light rail, commuter rail, rapid bus transit</li> <li>• Takes away some parking minimums to promote alternative transit modes</li> </ul>	<p><b>Score: 3</b></p> <ul style="list-style-type: none"> <li>• Serves all transportation users (cars, bikes, buses, pedestrians)</li> <li>• Emphasizes “all modes, all users” while focusing on vulnerable users including children, older adults, and those with disabilities</li> </ul>	<p><b>Score: 3</b></p> <ul style="list-style-type: none"> <li>• Increases access to transit like bus, rail, walking, and bike infrastructure near affordable housing</li> <li>• Expands neighborhood eligibility for TOD implementation</li> <li>• Prioritizes sustainable transportation infrastructure</li> </ul>

<b>Livability</b>	<p><b>Score: 2</b></p> <ul style="list-style-type: none"> <li>• Encourages inclusive, family-sized housing near transit hubs, promoting affordability in the long term</li> <li>• No explicit inclusion or focus on addressing historical harms or wellness integration</li> </ul>	<p><b>Score: 3</b></p> <ul style="list-style-type: none"> <li>• Focus on network connectivity to link schools, parks, job sites, and grocery stores</li> <li>• Promotes mixed-use areas and transit-oriented development in high-capacity transit corridors</li> <li>• Project Prioritization tool will be used to ensure equitable implementation and prioritize neighborhoods relying on low-cost mobility options</li> </ul>	<p><b>Score: 3</b></p> <ul style="list-style-type: none"> <li>• Centers inclusion of community input, community health, and integrates responsive planning</li> <li>• Aims to correct racial and economic inequities through investment in low-income neighborhoods and protections from gentrification</li> <li>• Prioritizes access to basic services, economic growth, and social cohesion</li> </ul>
<b>Total Score</b>	<b>22/30</b>	<b>25/30</b>	<b>29/30</b>

1. Evaluated using the San Antonio 2024 Complete Streets Policy (City of San Antonio, 2024)