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Jobs-housing balance at the sub-regional level as a key to adequate housing supply

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To achieve the needed increases in the supply of housing reasonably close to people’s jobs, it is necessary to prohibit actions by government officials that interfere with balance between the number of jobs in a community and the number of suitable housing units within a reasonable commuting distance of those jobs. That is what the Economic Fair Housing Act (EFHA) would do.

The general target ratio of jobs to housing units for a community has been defined as one housing unit for every 1.5 jobs.¹ The standard of jobs-housing balance within 30 minutes or less of the major workplaces in a community has been used by numerous planning groups, such as the Maricopa County, Arizona, Association of Governments;² The Housing Partnership (King County, Washington);³ and the Southern California Association of Governments (SCAG).⁴ Such a commuting area has been treated as a community, “commute-shed,” or subregion.

An American Planning Association (APA) report identifies similarly compact areas as appropriate for achieving jobs-housing balance.⁵ For example:

¹ APA Advisory Service Report No. 516, *Jobs-Housing Balance*, p. 4 (2003), posted at: <http://www.planning.org/pas/reports/subscribers/pdf/PAS516.pdf> (“APA Report 516”). Academic studies reviewed in the report found that acceptable ranges of jobs-housing ratios were between 1.3:1 to 1.7:1, depending on factors such as the number of workers per household in the community. *See id.*

² Maricopa Assoc. of Governments, *Commute Shed Analytics* (rev. April 4, 2022) (analyzing area from which a worker can normally commute in 30 minutes or less to various locations within Maricopa County (which includes Phoenix)).

³ An important theme of that group’s 2005 report on Seattle-area housing issues (partly funded by the Washington Association of Realtors) “is the focus on subregion, or commute-sheds. These rough geographic designations are built around employment centers and encompass an area that can offer commutes of under a half hour to most of the major employment sites in the subregion.” Housing Partnership, *Jobs and Housing: Can’t Have One Without the Other*, Seattle, December 2005, p. 1.

⁴ APA Report 516, pp. 16-17 (discussing research by SCAG planners that found “little public support for commuting more than 30 minutes. Consequently, SCAG used an average commute speed in the region of about 28 mph to calculate that commute-sheds have radii of about 14 miles around employment centers.”)

⁵ APA Report 516.

- Coburg, Oregon—“a small, rural *community* approximately seven miles north of Eugene”—had a “*mismatch of jobs and residences*” in 1998 and lacked sufficient affordable housing for its workforce, even though there were numerous, predominantly residential towns in the same county (Lane), within about a 30-minute commute.⁶
- Suburban “edge cities” bring together “a mix of activities at a scale somewhere between central cities and low-density suburbs.”⁷ They are major employment hubs and entertainment nodes and “*are also supposed to be self-contained, allowing people to live, work, and consume in the same place . . .*”⁸
- “Developments of regional impact” (DRI’s) (Atlanta, Georgia, region)—applicants for developments of more than 400,000 gross square feet of space have been required to study the project’s impact in relationship to development in its “Area of Influence” (AOI), or an area extending *six road miles from the development in all directions*.⁹

The APA’s Policy Guide on Housing (2006) states: “Planners must begin to address jobs-housing balance in their communities.”¹⁰

APA and its chapters should support a regional fair share distribution of housing, in general, and affordable housing, in particular, in proximity to employment centers and moderate- and low-wage jobs. . . . Ideally the jobs available in a community should match the labor force skills, and housing should be available at prices, sizes and locations suited to workers who wish to live in the area.¹¹

The concept of jobs-housing balance actually was developed as a transportation and environmental strategy, to reduce vehicle miles traveled (VMT) on the nation’s roads and resulting environmental degradation. EPA points out: “An imbalance in jobs and housing creates longer commute times, more single driver commutes, loss of job opportunities for workers without vehicles, traffic congestion, and poor air quality.”¹²

⁶ APA Report 516, p. 6 (emphasis added). Coburg had 1,704 jobs and 388 housing units in 1998; its jobs-to-housing units ratio was therefore 4.39 to 1. Almost all the workers in Coburg’s industrial and highway commercial areas lived outside the Coburg area. *Id.*

⁷ APA Report 516, p. 7.

⁸ APA Report 516, p. 7 (emphasis added).

⁹ APA Report 516, p. 29 (emphasis added). Those requirements were applied within the 13-county nonattainment area (for air pollution) of Atlanta by the Georgia Regional Transportation Authority, in 2002. *Id.*

¹⁰ APA, *Policy Guide on Housing, Specific Policy Position #2A: Fair Share Distribution of Housing* (2006).

¹¹ *Id.*

¹² U.S. Environmental Protection Agency (EPA), *EnviroAtlas: Fact Sheet*, p. 1 (Nov. 2014), citing Zhou, J., Y. Wang, and L. Schweitzer, *Jobs-housing balance and employer-based travel demand management program returns to scale: Evidence from Los Angeles*, 20 *Transport Policy* 22–35 (2012).

Related transportation problems include the costs of excess fuel consumption, road building, repair and maintenance.¹³ And environment costs also include increasing greenhouse gas emissions and resulting climate change; loss, degradation, and fragmentation of animal and plant habitat; and degradation and loss of water resources.¹⁴

Having local governments drop their regulatory barriers to the production and preservation of their fair share of the region's and subregions' housing needs is not only crucial to achieving adequate amounts and types of housing. It also is key to protecting the environment and improving the performance of transportation systems.

¹³ See, e.g., Texas A&M Transportation Institute, *2019 Urban Mobility Report*, p. 5 (2019) (summary of problems caused by traffic congestion).

¹⁴ See, e.g., EPA, *Our Built and Natural Environments*, pp. 34-70 (2013).