



To: Office of Sustainable Housing and Communities, Office of the Deputy Secretary, HUD

From: Regional Plan Association

Re: Comments on the Sustainable Communities Planning Grant Program Advance Notice and Request for Comment

Date: March 12, 2010

Regional Plan Association (RPA) welcomes the opportunity to comment on this important grant program. Having been engaged in regional planning in the New York – New Jersey – Connecticut metropolitan region for over eighty years and having prepared three regional plans that balance economic, environmental, and social goals, we understand the value of looking at the challenges that face our nation at the regional scale, exploring them comprehensively and simultaneously, and engaging a broad range of stakeholders in the process. We commend the Sustainable Communities Partnership as a necessary step towards breaking down the silos in planning and hope that this new thinking at the federal level will provide new capacity at the regional and local level to create livable communities with lasting value.

Our comments focus on five primary points: that the scale of partnerships reflect the geographic scope of integrated housing, transportation and environmental systems, that plans be allowed to take various forms to meet prescribed outcomes, that participation be equally outcome oriented rather than within a proscribed process, the need for a compelling vision, and that partnerships be required to represent multiple sectors and levels of government.

A. Proposed Funding Categories and Eligible Activities

The comments below refer primarily to Category 1: Regional Plans for Sustainability Development. However, many are also applicable to the execution of detailed plans and incentive programs described in Categories 2 and 3.

1) Scale of Planning

- Require a large enough geography to address the challenges of integrated housing markets, transportation systems and ecosystems.

In very few instances does an existing governance structure directly mirror the scale of the challenges this program is designed to address. While counties and Metropolitan Planning Organizations roughly correspond to metropolitan regions in some parts of the country, the Northeast is faced with a particularly jarring disconnect. Here, metropolitan areas, their commute sheds, natural systems, and infrastructures cross multiple jurisdictional boundaries of many scales. Within the New York Metropolitan area alone, we have all or portions of 10 MPOs. In the state of Connecticut, there are 15 regional planning agencies (10 of which are MPOs) and no county government.

The boundaries of a regional government entity, therefore, should not automatically qualify a proposal for these planning grants. Geographic partnerships must demonstrate that they meet criteria that are correlated to their ability to influence travel and land use patterns in order to have impact on the six proposed Livability Principles. This may include combinations of the areas of two or more MPOs, COGs or other regional entities. There may also be some instances, particularly in very large metropolitan areas, where these goals can be most practically addressed at something less than the scale of a full metropolitan area. However, applicants should demonstrate that the area is sufficiently large and distinct to address regional issues comprehensively. One criterion might be to establish a minimum threshold for the share of the commute-shed of the region's largest job center.

- Allow applications from Megaregions, or groupings of metro areas
We are also witnessing a new geography across this country termed "megaregions." These represent interconnected metropolitan areas with overlapping labor sheds and housing markets, ecological support regions, and transportation and energy infrastructure. The most established of these is the Northeast Corridor from Boston to Washington DC, and RPA's America 2050 initiative has identified 10 other existing or emerging megaregions. Megaregional-scale collaborations should be eligible for these planning grants if it can be demonstrated that planning is at an appropriate scale and contains necessary partners to orient growth around intercity infrastructure systems, such as high speed rail and commuter rail systems, that bridge metropolitan regions.

2) National Variation and Previous Plans

- Permit flexibility in plan form and methods to acknowledge variation in planning contexts and the existence of previous planning efforts

Not every region is like Portland or Salt Lake City and the processes that were successful there may not provide the exact template to achieve success in other parts of the country. Envision Utah, Portland 2040, and other groundbreaking visioning efforts in the 1990s and 2000s were primarily conducted in fast growing locations looking to manage growth and channel development into sustainable corridors and nodes around transit. A vision designed to encourage growth in New England or the Mid West may take a very different shape, and may require a different visioning and planning process.

In addition, existing plans that have been completed across the country may not fit the regional visioning product template, but achieve many of the same goals. For example, New York's Metropolitan Transportation Authority recently convened a broad-based blue ribbon commission on sustainability that produced a range of recommendations on everything from operational efficiency to land use with growth targets for the system's extensive transit network. New York City's PlaNYC initiative and Long Island's effort to produce a comprehensive vision and sustainability plan are other examples of existing foundations for a regional vision and plan. The program should encourage building on efforts such as these and adding the components necessary to build broad-based coalitions to shape and implement a shared vision. This could involve emphasis on stakeholder outreach, scenario planning, demonstration projects or other particular components, rather than starting a new process from scratch.

- *Require outcome oriented metrics*
We commend the goals of the Partnership and recommend some concrete metrics that plans could include which quantify the desired outcomes. Mobility choice could play out in mode split, VMT, or share of households with access to transit and walkable nodes of activity. Equitable and affordable housing options could be quantified with an assessment of regional housing need coordinated to demographic projections and manner in which resulting housing stock is calibrated to this future. Economic competitiveness can have many measures but may include cost of congestion, energy costs, relationship between cost of living and regional incomes, or linkages to global gateways (airports, ports, higher education, etc...). To demonstrate support for existing communities plans should demonstrate how existing infrastructure is being capitalized on and maintained or new infrastructure located in places of existing investment concentration prior to infrastructure expansion.

3) Citizen Engagement

- *Set criteria rather than prescribe the process*
The hallmark of many visioning efforts across the nation has been their robust participatory processes to allocate growth across a landscape and

determine the supporting public investments to enable the preferred future. Plans should certainly go beyond public hearings and include meaningful forms of engagement but they need not fit the exact template of regional visioning implemented in places like Oregon and Utah. There are many strategies for meaningful engagement that don't all include moving chips around a map and regions should not be confined to this methodology. Applicants should be permitted to propose engagement processes as long as they meet key criteria:

- Meaningful participation from all relevant stakeholders, including business, labor, environment, community and all levels of government
- Opportunities for citizen as well as leadership input
- Robust outreach strategies
- Incorporation of stakeholder input at key stages in the process, including goal-setting, scenario development, policy recommendations and plan formation
- Evaluation and ratification of final vision or plan

4) Motivating Implementation

While encouraging the most effective methods, metrics, criteria and partnerships, the program should not lose sight of the importance of creating compelling visions and strategies that will capture the public's imagination and provide the motivation to overcome the political, financial and institutional roadblocks that invariably impede implementation. The most successful regional plans have been those that have been built around bold, imaginative visions that command the attention of the media, public officials and citizens. Even the most finely crafted metrics will not stir the hearts and minds of most who need to engage. The final notice should explicitly encourage ambitious visions, and require partnerships to describe how these will formed and communicated.

B. Entities Eligible for Funding

- Ensure rather than encourage a 'big tent'
The list of potential partners that the Partnership has been sharing in meetings and at listening sessions is encouraging and is the right group of stakeholders necessary to complete comprehensive visions for regions. However, encouraging these partnerships is not enough. We recommend that every applicant be required to demonstrate government (state, regional, and local), business, and civic participation to some degree. Applicants could be required to include a preliminary steering committee list to demonstrate the inclusion that is conceptualized at the outset.

- Required partners should be interdisciplinary and include all levels of government
Applicants should be required to demonstrate that they are engaging the necessary partners for implementation, including municipalities, transportation agencies or MPOs, state and regional agencies for sewers, water, and transit, housing agencies and utilities. Partnerships that include non-governmental entities representing key constituencies should also be encouraged. No single interest should dominate the partnership. This is especially true of transportation, which in too many places has dominated the regional planning process.

- Lead applicants need not be metropolitan planning organizations, but should ideally represent a broad regional interest.
In many cases, MPOs will be ideally suited to lead this process. In others, a regional transportation agency, housing agency or council of governments may be in a better position to lead and implement an effective regional process. Non-governmental organizations may also be appropriate conveners of a partnership where no governmental unit has the right geographic span or organizational capacities to lead the effort.