



Mr. Ron Sims
Deputy Secretary
U.S. Department of Housing and Urban Development
451 7th Street S.W.,
Washington, DC 20410

March 8, 2010

Dear Secretary Sims,

We are writing on behalf of the National Recreation and Park Association (NRPA) in response to your request for public comments on the Advance Notice for the *Sustainable Communities Planning Grant Program*.

NRPA is a national, not-for-profit organization dedicated to advancing park, recreation, and conservation efforts that enhance the quality of life for all people. NRPA and our network of more than 21,000 citizens and professionals encourages the promotion of healthy lifestyles, recreation initiatives, alternative transportation networks and conservation of natural and cultural resources. NRPA believes that parks and recreation have a vital role to play in the creation of more livable, sustainable communities.

As co-chairs of the Board of Directors' Public Policy Committee, we would like to express our appreciation for the opportunity to provide comments on the Sustainable Communities Planning Grant Program. In an effort to offer comments that will assist The Partnership for Sustainable Communities (the Partnership) in developing the most effective program possible, NRPA formed a working group comprised of a broad cross section of agency directors and staff from our membership who offered their expertise and input into making our country more livable for future generations.

Again, we would like to thank the Partnership for seeking input in this process and for its continued commitment to regional planning for sustainable development. We are looking forward to working with you on this and other initiatives.

Sincerely,

A handwritten signature in black ink that reads "Mark G. Young".

Mark Young

Co-Chair Public Policy Committee

A handwritten signature in black ink that reads "Janice Prochaska".

Janice Prochaska
Co-Chair Public Policy Committee



NRPA's Understanding of the Purpose of the Advanced Notice of the Sustainable Communities Planning Grant Program

Our comments are in response to HUD's request for feedback on how the Sustainable Communities Planning Grant Program (Program) should be structured, what funding categories and activities are most appropriate to support, which entities should be eligible grantees, and how best to evaluate regional needs, so that the Program has the most meaningful impact on regional planning for sustainable development.

Comments and page numbers correspond to the Advance notice document posted at http://portal.hud.gov/portal/page/portal/HUD/documents/advance_notice_and_request_for_comments_sustainable_comm.pdf

Category 1: Regional Plans for Sustainable Development **Page 11**

As outlined by HUD, Funds would support stakeholder-driven visioning and scenario planning exercises that will address and harmonize plans for the location, scale and type of housing, education and job centers; identify appropriate transportation and water infrastructure; and proactively consider risks from disasters and climate change. Funding in this category would support data analysis, urban design and outreach efforts to achieve broad consensus among groups, citizens, and decision-makers for a single vision/scenario and to have that plan adopted by all appropriate regional governmental bodies.

HUD seeks comments on the following questions:

1. What specific types of eligible activities would support this effort and which parties should be part of the regional planning process?

We believe that the type of eligible activities that would support this effort include assessment of community needs (current and future), goals and values as identified in local and regional cooperative agreements, Master Plans, and other similar formal collaborative plans; coordination of physical planning data; and education to facilitate the public input process. The parties that should be part of the regional planning process include Metropolitan Planning Organizations (MPOs), Councils of Governments (COGs), Planning and Zoning Departments, Housing Agencies, Parks and Recreation agencies and departments, Economic Development Agencies, Agriculture Departments, Transportation departments, water, sewer, and public utilities, Wildlife Departments, County Governments, and, if regional or multi-state, officially designated representatives from jurisdictions or duly elected officials from all states.



2. What elements should be part of the plan, such as a region-wide vision and statement of goals, long term development and infrastructure investment map, implementation strategy and/or funding plan?

As regional plans for sustainable development are developed by the entities mentioned above, such plans should include short and long term sustainability goals, an outline of how the region intends to achieve those goals, and an implementation strategy. Such plans should also identify environmental, legislative and other impediments to implementation of a regional plan and outline steps to remove the impediments. We also believe that the regulation should require the identification, inventory, and inclusion of green space, greenways, blueways, agricultural/forested lands, parks, recreation facilities, urban and other forest lands, and alternative transportation networks as part of the plan with an explanation as to how the plan will address or improve upon: adaptation and mitigation strategies for response to climate change conditions; energy efficiency improvements; sustainable landscape metrics, air quality, water quality, connectivity of work-home-public spaces, and economic opportunity.

3. How can citizens best participate, such as through a requirement for participation in a minimum number of public meetings to ensure broad regional consensus?

We recognize that each community is different and while some communities participate more in public forums, others prefer other vehicles. Therefore, in order to promote the best citizen participation, we recommend public hearings at hours convenient for public attendance, online streaming of hearings, use of local public TV and radio where appropriate and possible, and outreach strategies that allow a variety of ways and means of submitting comments electronically.

4. Should Regional Plans for Sustainable Development be expected to harmonize and be consistent with HUD, DOT, and EPA-required plans and, if so, how?

Yes, we believe that regional plans for sustainable development should be incorporated into and consistent with HUD, DOT, and EPA-required plans to the extent it is practical and feasible. Communities will find it difficult to achieve regional solutions for sustainability without complex and comprehensive planning. And while many of the communities are already carrying out planning through other programs, more collaboration between local and regional entities will only improve such efforts. It therefore is logical for regional plans for sustainable development to be harmonized with plans required by HUD, DOT and EPA to the extent possible. We recommend that the same implementation steps required in HUD, DOT, and EPA-required plans should be the implementation steps required in the Regional plans for sustainable development.

5. Should Regional Plans for Sustainable Development show a linkage to local formula-based programs supported by HUD, DOT, and EPA; and, if so, to what extent should such linkage be required?



We believe that regional plans for sustainable development should show a linkage to local formula-based programs supported by HUD, DOT, and EPA to the extent that the formula-based programs support the six Livability Principles, they should be considered relevant. We recommend that a statement of performance measures and outcomes be included in regional plans. The Regional Plan should assess the impact of formula-based programs and comment on their consistency with the Principles as applied in the local communities.

Category 2: Detailed Execution Plans and Programs

Page 12

Funds in this category would support the preparation and adoption of detailed plans and programs to implement an adopted integrated regional sustainable vision. Regional coalitions would be eligible to apply for this category on the basis of demonstrating the adoption of a regional vision that is substantially consistent with the Livability Principles, program goals and metrics identified in the published NOFA.

1. What specific types of activities should be eligible for funding in this category?

The type of activities that we think should be eligible for funding in this category include support for development of plans for: open space conservation; green infrastructure protection, recreation needs assessment, greenways blueways, bike/pedways, urban and community forestry, and urban agriculture plans and programs.

2. What criteria should be used to evaluate whether a previously adopted regional vision is consistent with the Livability Principles discussed above?

We believe that in terms of the criteria that should be used to evaluate whether a previously adopted regional vision is consistent with the Livability Principles, the Partnership will have to evaluate the previously adopted regional vision on a case-by-case basis in regards to the Livability Principles and the goals established by the previously adopted plans.

3. Should the amount of local and contributed resources to support, expand, and enhance the development of implementation strategies be rewarded in application scoring or are there other means to leverage other funds and resources?

We support the idea of leveraging local and contributed resources to support, expand, and enhance the development of implementation strategies and feel that evidence of local commitment is important. NRPA recommended that the Partnership allow in-kind contributions to account for a percentage of the local match.



Category 3: Implementation Incentives

Page 13

Recognizing that those regions that have already fully embraced sustainable regional planning provide important models to the nation, the Partnership is considering ways in which the Program can reward and incent further action by cutting edge regions. First, HUD is evaluating the extent to which applicants that have an adopted Regional Sustainable Development Plan and appropriate implementation programs in place could be pre-certified as having met HUD, DOT, and EPA's criteria for sustainability and livability factors in other discretionary federal funding programs.

Second, HUD is considering providing a limited number of grants to complete a financing package for projects that would accelerate the implementation of a Regional Sustainable Development Plan.

1. Would "pre-certification" be an added value and, if so, what programs should this approach apply to? What criteria should be considered for meeting the "pre-certification" status?

We believe that pre-certification of some communities might deter other communities from engaging in this program. We would suggest, that if the Partnership develops a pre-certification for funding, that it ensure the process to become certified is open, free of barriers which would prevent applications, cost neutral to the extent possible free of burdensome requirements and which contain clear criteria regarding the requirements for pre-certification.

2. Is the direct support of implementation activities appropriate within this Program given the limited amount of resources and the expected modest size of grants?

We believe that in some limited cases the direct support of implementation activities may be appropriate within this program, but that the support be primarily directed toward planning activities. This presumes that some follow-on funding is eventually dedicated toward implementation of approved plans. We recommend that federal agencies outside of the Partnership should work collaboratively to provide resources and technical support to the sustainability program as Regional Plans are being implemented.

3. What criteria should be used to judge that an applicant successfully demonstrates that it has an adopted regional vision and that the project for funding under this category is truly catalytic?

We believe that projects should include the measurement and reporting of verifiable outcomes that relate to the Livability Principles such as the applicant's attempt to



structure their application to achieve the following goals: (1) providing more safe, reliable and economical public transportation options; (2) expanding local energy efficient housing options; (3) improving economic competitiveness employment centers and education opportunities; or (4) supporting existing communities infrastructure with the goal of demonstrating measurable outcomes in achieving stated goals for sustainability.

4. Specifically, what criteria should be considered for a project to be catalytic?

We believe that the criteria that should be considered for a project to be catalytic should include key threshold measures of how and why regional or intergovernmental cooperative plans are immediately necessary or beneficial for responding to environmental, energy, or other highly compelling issues to regional communities, such as threats to infrastructure, loss of environmental quality affecting public health, measurably improving cost of delivery of public services, and other such catalytic or triggering events or circumstances. In addition, criteria should describe how the project would continue to benefit the community once federal funding has ended.

5. What types of activities might be included, the timeframe by what time the project should be completed, and how much leveraging should be considered appropriate for demonstrating that the proposed investment will serve as a the region's commitment to a sustainable future?

We believe that the establishment of local land trusts, alternative transportation consortia, community food alliances, regional parks authorities, multi-jurisdictional air quality authorities, regional watershed protection authorities should be included. We also feel that three to five years will be needed to achieve the inter-local agreements necessary to establish such programs and create stable local funding for future operations. Local commitment should include the effort given to creation of partnerships and inter-local agreements.

Entities Eligible for Funding

Page 14

In the Program, HUD is considering as an eligible entity a multi-jurisdictional and multi-sector partnership consisting of a consortium of units of general local government and all government, civic, philanthropic and business entities with a responsibility for implementing a Regional Plan for Sustainable Development.

1. Should certain entities be required partners in multi-jurisdictional regions such as a metropolitan planning organization as defined in 23 CFR 450.104, or a rural planning organization or network of rural planning organizations in a rural area?



We believe that certain entities should be required partners in multi-jurisdictional regions but there should be steps to make sure the requirement will not stifle creative and focused programs, such as community-supported agriculture, alternative transportation networks, land trusts, and watershed councils.

2. What definitions should HUD use to define a rural multi-jurisdictional region eligible for funding?

NRPA believes others are more qualified to provide definitions and provides no response to this question.

3. What units of government should be allowed to serve as a lead agency for funding purposes?

We believe that any unit of government with a demonstrated capacity to manage federal funds should be eligible to serve as a lead agency for funding purposes.

4. What should demonstrate commitment on the part of each member organization, and whether there should be a minimum number of member organizations?

We believe that adoption by the organization of goals consistent with the Livability Principles would demonstrate commitment on the part of each member organization. Additionally, member organizations should be required to contribute to the local match in addition to working with their local governments to adopt the regional plan once it is finalized. We also believe that parks and recreation agencies should be included as a member organization because they provide many of the facilities that will be used and staff support to help make decisions in regards to creating regional plans that are trying to make communities more sustainable.

Selection Criteria

Page 14 and 15

HUD seeks input on how to judge the capacity of the regional entity to carry out the proposed Program, including the extent of technical and organizational capacity to conduct the project in the proposed time frame, past experience in implementing a planning process, and/or an implementation project as proposed, and extent to which the consortium has developed partnerships throughout an entire metropolitan or rural area, including, as appropriate, partnerships with the entities described above. Specifically, should a needs assessment be required as an application submission requirement, and, if so, what data elements should be mandatory in judging need and the scope of the needs assessment to ensure that it addresses the comprehensive needs of the region?



We believe that selection criteria should be scaled to the size of the proposed project in order to allow for creative and focused projects. To address the social equity principle, the following criteria should be included:

- (a) Population per square mile*
- (b) Population under 18 years of age or above 60 years of age*
- (c) Percent of civilian workforce unemployed*
- (d) Percent of households without automobiles available*
- (e) Percent of persons with incomes below 125% of the poverty level*
- (f) Change in per capita income*

We also believe that a needs assessment should be required as part of the funded planning process, but not made a pre-condition of a grant application. In addition, identification of expected performance goals and outcomes should be included.

Final Thoughts

NRPA applauds the commitment of the Sustainable Communities Partnership in developing grants to help communities address the challenges of growth and revitalization in the future through this integrated planning process. By integrating housing, transportation, economic development, water infrastructure, and environmental planning, we believe that communities can become more livable and sustainable thus benefiting the health and well being of present and future citizens.