



Building One America

A NATIONAL COALITION FOR REGIONAL OPPORTUNITY

March 11, 2010

Ms. Shelley Poticha
Director
Office of Sustainable Housing and Communities
Department of Housing and Urban Development
451 7th Street, S.W. Room 10180
Washington, DC 20410

RE: Comments on Sustainable Communities Initiative Planning Grants

Dear Ms. Poticha:

We are writing on behalf of the Building One America coalition and other civil rights and housing organizations that share Building One America's commitment to building a nation of racially and economically integrated and environmentally sustainable regions. We are most enthusiastic about the potential of the Sustainable Communities Initiative to significantly advance that goal, particularly in light of the commitments made by HUD Secretary Shaun Donovan, DOT Secretary Ray LaHood, and EPA Administrator Lisa Jackson, who all stated, in effect, that "sustainable must be equitable" at the New Partners for Smart Growth Conference on February 4 in Seattle. That commitment was memorably reinforced by HUD Deputy Secretary Ron Sims in his inspiring remarks to conclude the conference. We are committed to helping him and you make the Sustainable Communities Initiative a transformational chapter in the quest for social justice and regional opportunity.

In responding to the Sustainable Communities Planning Grant Program Advance Notice and Request for Comment [Docket No. FR-5396-N-01], we are guided by two parameters:

- a) HUD and its partners, DOT and EPA, have been provided with very broad latitude in designing the SCI Planning Grant Program through the very general explanatory language of the Consolidated Appropriations ACT of December 16, 2009; thus, in terms of developing national models for achieving both greater social justice and enhanced environmental sustainability HUD-DOT-EPA must set the bar very high for the pilot planning grant program; and
- b) Significant, measurable progress in eliminating racial and economic segregation and concentrations of poverty must be an explicit, required, and central element of

any regional plan and of all grants-in-aid provided by HUD, DOT, and EPA to implement such a plan.

Our recommendations, focusing on regional opportunity goals, will be summarized in this letter and expanded upon and documented in attachments. We offer ten primary recommendations.

1. An SCI Planning Grant must be genuinely regional in scope, covering the jurisdictions that comprise a metropolitan or micropolitan area, or, at least those jurisdictions forming the urbanized area of such, including the principal city or cities and first suburbs.
2. The recipient of an SCI Planning Grant must be a governmental unit (such as a county for single-county regions), or consortium of governmental units (such as a Metropolitan Planning Organization or Council of Governments) or, in the absence of interested local governments, a state agency – in short, public bodies that control development policy (land use, commercial and industrial development, housing, transportation and other infrastructure, etc.) within a region.
3. There must be proportional representation on an SCI Planning Grant recipient's governing body of the residents of principal cities and first suburbs (where minorities and low-income households are typically concentrated); or, failing that test, an SCI grant recipient must establish a decision-making substructure that achieves proportional representation.
4. An SCI Planning Grant applicant must set forth a plan for meaningful citizen involvement in the planning process, including the involvement of regional opportunity advocacy organizations.
5. A primary goal of an SCI Planning Grant must be the reduction of racial and economic residential segregation and school segregation and concentrations of poverty on a regional basis with aggressively affirmatively furthering fair housing as a fundamental policy; a method must be specified to document progress in achieving greater racial and economic integration.
6. Using one of several methodologies provided by the Office of Sustainable Housing and Communities, an SCI Planning Grant recipient must conduct a regional opportunity assessment that measures relative opportunity (jobs, schools, local services, safety) by municipality or census tract.
7. A mandatory element of an SCI Planning Grant must be policies and programs that result in low-income residents of low opportunity communities having realistic options of moving to high opportunity communities as well as policies and programs to upgrade the quality of life in low opportunity communities.

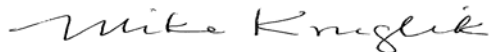
8. To the maximum extent, an SCI Planning Grant must result in new housing development and redevelopment providing affordable shelter for low-, very low-, and extremely-low income families within mixed income, market rate developments in higher opportunity communities.

9. Upon review and certification of the compliance of a regional comprehensive plan with the goal of promoting more sustainable and inclusive regional communities, HUD, DOT, and EPA (and such other federal agencies as the President or Congress may designate) must make all applicable grants-in-aid (such as transportation infrastructure, housing and community development, and water and sewer infrastructure funds) in accordance with the provisions of the plan.

10. The recipients of all infrastructure grants-in-aid made in compliance with a regional comprehensive plan must implement policies and programs to increase the training and employment of women and minority group members on such infrastructure projects.

The regional members and national allies of the Building One America coalition look forward to meeting with you to discuss these recommendations at the earliest possible time.

Sincerely,



Mike Kruglik
Executive Director,
Building One America

Building One America members and additional supporting organizations:

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