



May 7, 2010

U.S. Department of Transportation
1200 New Jersey Avenue SE
Docket Operations
M-30, Room W12-140
Washington, DC 20590
Fax: 202-493-2251

Subject: Office of the Secretary of Transportation, Docket No. DOT-OST-2010-0076

To Whom It May Concern:

The National Association of Regional Councils (NARC), representing multi-jurisdictional regional planning organizations and local governments of all sizes, including metropolitan planning organizations (MPOs) and councils of governments (COGs), is grateful to the U.S. Department of Transportation (DOT) for its efforts to promote opportunities that reinforce its commitment to the federal interagency Sustainable Communities Partnership. NARC offers our national network of more than 500 established regional planning organizations to the DOT as it moves forward in its relationship with the U.S. Department of Housing and Urban Development (HUD). Our members stand ready to showcase immediate success with measurable and replicable on-the-ground progress through federal initiatives like the HUD Sustainable Communities Planning Grant Program, DOT TIGER II Discretionary Grant Program and HUD Community Challenge Planning Grant Program.

NARC respectfully submits the following recommendations, based on significant and diverse member input, supporting the proposed coordination of DOT TIGER II Planning Grant funding with the HUD Community Challenge Planning Grant Program.

Introduction

Today's challenges require creative solutions that leverage the concentrated talents, productivity and economic strengths of our nation's regions through the collaboration of cities, counties, towns, townships and even states across physical and political boundaries. Regional job and housing markets, industrial clusters, transportation and energy systems, schools, cultural amenities and ecological resources unite multiple localities in a common future. Constrained state and local budgets necessitate regional approaches to pool resources, data and public-private partners and develop and implement comprehensive solutions that improve service and quality while saving money and time. **Regional planning organizations, including MPOs** are the natural unit to address the complex and interconnected opportunities we face and to plan for long-term change and growth. Through comprehensive, integrated and visionary regional planning and implementation, federal investments achieve maximum benefit with strong regional, local and community leaders pursuing common goals.

Proposed Grant Program Coordination

NARC believes there is great value in joining the DOT Tiger II and HUD Community Challenge Planning Grant Programs, funding and evaluation into a single granting process as a step to aligning the efforts, goals and objectives of the two agencies, thereby reinforcing the federal interagency Sustainable Communities Partnership. Combining the granting opportunities will allow for visionary, comprehensive proposals, and will avoid multi-agency procedural hurdles and heavy administrative burdens on both the applicants and federal reviewers. There should be flexibility to award funding if a proposal significantly meets the needs of one program versus the other; yet, strong merit and extra credit should be given to those proposals that successfully meet the needs of both programs in a cost effective and efficient manner. Clear guidance and criteria must be specified to ensure proposals meet the overall needs of both DOT and HUD program interests.

To best serve the needs of DOT, HUD and the Partnership, the combined grant effort should look to distribute funding to qualified grantees that are representative of diverse groups of locally-governed regional planning organizations. Further, the program should support the **mutually agreed upon decisions** of the local governments, community stakeholders and non-government agencies who are involved in the regional planning process, and provide choice in achieving common goals, while encouraging and incentivizing planning, procurement and projects **consistent with regional efforts**.



The combined DOT-HUD planning grant program should **avoid mandating new planning requirements**. It should patch together crosscutting programs and planning requirements and investment through incentives that promote holistic approaches to establishing livable communities. This includes the alignment of timetables, schedules, data and research, plan assumptions and forecasts, interagency consultation and outreach requirements. This will help facilitate on-the-ground program linkages that exercise regional approaches to development.

The DOT-HUD planning grant program should fund planning that promotes economic development, competitiveness and job creation through regional approaches that coordinate and improve housing, community and economic development, transportation, and environmental sustainability through integrated, comprehensive regional planning and implementation. To execute these priorities, the program must encourage strong **regional partnerships** that include broad, but targeted stakeholder involvement with local governments, interested citizens and community groups, businesses, non-profits and non-governmental agencies.

The DOT-HUD planning grant program should **incorporate the Livability Principles** as a guide for grantees, and a tool for funding priority. Regional planning organizations should be responsible for **developing local, flexible performance metrics** that feed into these Principles. This will allow for varying approaches and activities to be implemented that meet the unique needs of a given region while still achieving the joint program goals and federal vision.

In terms of evaluation, the main criteria should be based on meeting community-wide or regional needs where the comprehensive transportation and development projects can be the catalyst for change. **The impacts need to be felt on a regional level or transferrable to other communities**. Projects that offer comprehensive solutions should be preferred, but specific projects that have far reaching impact should also be eligible and scored accordingly. NARC recommends avoiding narrowly defined criteria and evaluation, but instead emphasizing the regional impact. This is particularly true as it relates to the original HUD Community Challenge Planning Grants eligible activities, where preference is on low, very low and extremely low income housing. Planning funds should not be preferentially given to any one income definition, but should be focused to varying neighborhoods that address the greatest local need. This is a unique opportunity to support much needed regional approaches. Being part of a healthy region will have greater, longer-term impacts.

When it comes to evaluating transportation plans, projects and programs, the DOT is best qualified to act as the lead federal agency in charge of these activities. DOT must drive the process for approving and funding transportation-specific plans and projects. The same is true for HUD-sponsored programs and projects.

Entities Eligible for Funding

NARC and its membership know that that the federal vision and goals will be best served by existing public regional planning organizations of all sizes and make ups that are composed of and governed by multiple, general purpose local governments. These entities should be the lead eligible funding recipient and mandatory critical partner in successfully executing the HUD grant program. There are many benefits in using **existing multi-jurisdictional regional planning organizations (i.e. MPOs) as primary grant recipients**. These organizations have the support of their local governments, elected and appointed officials, community stakeholders and business. They have the authority under federal, state and/or local laws to carry out planning activities, and have decades of capacity building and executing on-the-ground success. Direct allocation to regional planning organizations and consortia of local governments can bridge gaps in the federal-state-local agency partnership and increase the speed at which funding hits the ground. Regional planning organizations and local governments, currently certified to carry out much of the planning and implementation discussed here, will accept the responsibilities that accompany this authority and funding, while meeting performance and accountability goals.

NARC recommends the DOT-HUD planning grant program cover a broad range of regions include all make ups, populations and capabilities of regions, and we support a portion of the competitive funding to go to non-urbanized areas. At a minimum, regional planning organizations (i.e. MPOs) must endorse or sign off on all applicant efforts and be a primary partner in all endeavors.



NARC

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Conclusion

On behalf of the NARC Board of Directors and membership, we applaud DOT and HUD for examining the benefits of a joint granting process that would advance federal sustainability initiatives and link federal agency work. We offer the commitment of our local elected officials and regional planning organizations to provide the immediate successes needed in pursuing this joint grant program. Multi-jurisdictional regional planning organizations stand ready to meet federal objectives and local goals that maintain and improve the livability, sustainability, accessibility and prosperity of our nation's communities.

Should you have any questions concerning our comments, or require further information, please contact Fred Abousleman, NARC's Executive Director, at 202.986.1032 or fred@NARC.org. Thank you very much for the opportunity to comment.

Sincerely,

A handwritten signature in black ink that reads "Stephen T. Cassano". The signature is fluid and cursive, with a large, sweeping flourish at the end.

Stephen T. Cassano
President, National Association of Regional Councils
Selectman, Town of Manchester, Connecticut