

[Docket No. FR-5396-N-01]

**Sustainable Communities Planning Grant Program Advance Notice and Request for Comments**

Thank you for this opportunity for the Chicago Metropolitan Agency for Planning (CMAP) to comment on the forthcoming Sustainable Communities Planning Grant Program. Formed in 2005, CMAP integrates planning for land use and transportation in the seven-county northeastern Illinois region, which has an estimated population of 8.5 million and includes 284 municipalities. CMAP is the region's federally designated Metropolitan Planning Organization, or MPO. The agency is developing and will implement (beginning in fall 2010) the *GO TO 2040* comprehensive plan to guide development and infrastructure decisions through mid-century. For more information, please see our website ([www.cmap.illinois.gov](http://www.cmap.illinois.gov)) or contact the agency.

First, CMAP believes that regional plans should guide investment decisions and that aligning federal, state, and local investments with comprehensive regional planning is the path to sustainability and economic prosperity for metropolitan areas. We are encouraged that HUD is partnering with EPA and DOT to make planning funds available in support of regional integrated planning initiatives. While that interagency partnership is a very important development, these initial grants should be considered as just the first step in changing how government agencies at every level collaborate to promote the implementation of regional plans. Therefore, we encourage the Sustainable Communities Initiative to strive to align HUD, DOT, and EPA programs, regulations, and funding at the federal level to promote more efficient, effective, and collaborative implementation at the regional level. Our hope is that, ultimately, federal agencies such as yours will strongly encourage -- or even require -- any entity applying for federal funds to demonstrate how its proposal aligns with regional plans.

Second, the Sustainable Communities Initiative should require that a region's federally designated MPO should be the lead agency and/or partner on any application for funding from the initiative, in light of the MPOs' well-established framework for regional planning. Over the course of more than four decades, the DOT has established an important precedent for the federal government to incentivize and, in many cases, to require effective planning at the regional level. While these capabilities differ between metropolitan areas across the U.S. -- for example, not every MPO has responsibility for comprehensive planning, as the State of Illinois has created CMAP to conduct -- the MPO framework is a unique basis upon which the Sustainable Communities Initiative should build its efforts to synchronize housing and environmental planning with transportation planning.

### **Category 1: Regional Plans for Sustainable Development**

CMAP is currently in the process of developing its [GO TO 2040](#) plan, the region's first truly comprehensive plan. The agency and its partners are identifying regional priorities and defining outcome-based performance measures across the broader issue areas of transportation, land use, housing, environment and natural resources, economic development, and human services. Because CMAP and *GO TO 2040* are at the leading edge of metropolitan agencies that are aggressively advancing a regional agenda that reflects the Sustainable Communities Initiative's priorities, our agency would be happy to provide guidance in how a similar process could be used to develop "Regional Plans for Sustainable Development" as described in the Category 1 of the Request for Comments.

The Sustainable Communities Initiative is an opportunity to support and encourage each metropolitan region to prepare one comprehensive land use, transportation, housing, and environment plan that meets all federal requirements and at the same time clearly addresses each of the Livability Principles. Regions with existing comprehensive plans that already meet the above criteria should be rewarded by pre-certification and the ability to apply for funding categories 2 and 3. We caution HUD, however, not to be overly prescriptive with criteria that might inadvertently stymie local and regional flexibility in developing regional plans.

### **Category 2: Detailed Execution Plans and Programs**

Funding under Category 2 should be directed to regional entities that already possess or are in the process of developing a regional comprehensive plan. It should provide them with the tools they need to further refine regional plans and to provide implementation assistance and incentives at the local level. Implementation of regional plans is by no means limited to capital investment. For example, many plans recommend changes to zoning ordinances or land-use regulations, but funding is rarely available for the "next steps" that are necessary to turn those plans into reality. The Sustainable Communities Initiative could assist by providing funds for developing regional programs needed to improve planning and to reform regulatory processes at the local level. The initiative could also help to fund targeted technical assistance for communities seeking to implement particular provisions of a regional plan (e.g., implementing a more compact and mixed-used pattern of development), as opposed to more-general planning assistance. Additionally, Sustainable Communities Initiative funds could be used to develop the strategies needed to better align federal resources with Livability Principles.

### **Category 3: Implementation Incentives**

As stated under Category 2, implementation initiatives can take form beyond capital investments in terms of programmatic initiatives that encourage better planning, policies, and regulatory reforms at the local level. This should not mean, however, that capital investment is an ineligible use of Sustainable Communities Initiative funds. In some cases, the use of SCI funds to provide capital investment in a catalytic project may be appropriate, especially if overall federal appropriations for SCI funding are bolstered in subsequent years.