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Housing and  
Community  
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Collaborative**



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Housing Collaborative**



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**West Cook County  
Housing  
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**To: Ron Sims, Deputy Secretary, U.S. Department of Housing and Urban Development (HUD)  
Shelley Poticha, Director for the Office of Sustainable Housing and Communities, HUD**

**Re: Joint Comments from the Chicago Region on HUD’s Sustainable Communities Planning Grant Program Advance Notice**

Thank you for the opportunity to comment on the Sustainable Communities Planning Grant Program. As regional policy and philanthropic organizations, and collaborations of municipal leaders working in close collaboration with the State of Illinois, we are thrilled by the leadership and attention you are bringing to this field. In 2005, stakeholders from throughout the Chicago region successfully pursued state legislation which created “a streamlined, consolidated regional planning agency [to] plan for the most effective public and private investments in the northeastern Illinois region and to better integrate plans for land use and transportation.” The result of that legislation is the Chicago Metropolitan Agency for Planning (CMAP), an organization fundamentally oriented around the implementation of the Livability Principles. CMAP’s *GO TO 2040* Comprehensive Planning Process, for example, relied on the H+T Affordability Index and a broad group of stakeholders to arrive at key metrics and inform policy recommendations. Our organizations are proud and active partners of CMAP, its *GO TO 2040* Comprehensive Planning Process and a range of other related initiatives. In this spirit, our response to the “**Sustainable Communities Planning Grant Program Advance Notice and Request**

**for Comment”** is entirely supportive of the letter you received from CMAP. Additionally, we share the following suggestions:

A broad-based partnership should be the hallmark of any application: While a Metropolitan Planning Organization (MPO) is an essential participant and the logical lead applicant, a range of stakeholders representing the spectrum of institutions and corporations that will be charged with eventual implementation should be involved. This includes state agency representatives, CDBG Entitlement Recipients, Councils of Governments, municipal collaborations, non-profit housing, transportation, workforce and environmental advocates, non-profit and for-profit developers, employers, foundation representatives, public housing authorities and members of underrepresented populations. CMAP has an extensive committee structure that can continue to evolve and serve as a vehicle for meaningful involvement in planning for sustainable communities. Additionally, coordinating efforts among neighboring regions should be encouraged.

Furthermore, consistent with CMAP’s comment “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,” it is critical that the resulting local and subregional plans create more predictability and support for the developers advancing these broader efforts through rehab, redevelopment and new construction.

Existing plans should be eligible for detailed execution and implementation funding: Regions that have developed or are in the process of developing comprehensive plans encompassing land use, transportation, economic development, fair and affordable housing, natural resources and health and human services should be qualified to apply for additional planning or implementation funding under the program. CMAP has spent the last three years preparing background studies and analyses, soliciting input from residents, officials, experts and businesses in the region, and is on schedule to adopt a comprehensive plan this coming fall.





Community revitalization outcomes consistent with the livability principles should be clearly delineated in the comprehensive plan and measurable performance metrics adopted: The quality of existing and new regional plans should be judged based upon established criteria such as consistency with HUD-DOT-EPA’s Livability Principles, the adoption of metrics that reflect specific improvements to a baseline set of conditions spanning the spectrum of issues central to livable communities (reduced cost of living and environmental impacts, equitable distribution of housing and transportation choices, job creation, etc.) and documented and demonstrable progress toward these goals. Bonus points should be given to regions, such as metro Chicago, where livability metrics have been adopted and can serve as a model for other regions. Additionally, because economic development policies often have parallel workforce development implications, and because the current language proposed for the Sustainable Communities Planning Grant doesn’t advance the Livability Principle to “enhance economic competitiveness” as completely as the others, we suggest that workforce education and training be a key element of a comprehensive regional plan. Applications should be rewarded for providing incentives for including workforce education and training components in regional planning and activities.

Execution and implementation plans should align public investments from the transportation, CDBG and energy efficiency programs but should not be limited solely to strong market locations at the expense of equity considerations: While we applaud the desire to leverage private sector resources as part of a sustainable communities strategy, relying exclusively on such an approach risks having the

public sector skip over the very same communities that the private market has ignored. One principle of the Sustainable Communities Partnership is the support of existing communities. In the Chicago region, many existing weak market communities across the region offer the greatest potential for transit-oriented development to capture future demographic and economic growth in sustainable ways and to breathe new life into places that have lost their luster.

Execution and implementation plans should further be evaluated and utilized to demonstrate and advance the “national learning” on a number of key challenges, including (a) how regional planning organizations coordinate with State block grants and other state resources, programs and policies to promote regional capacity and interjurisdictional coordination in program implementation and the advancement of regional plans; (b) how employers are engaged in implementation, promoting job creation and job stability, and providing leadership and investment in support of the broader effort; (c) how philanthropy is engaged in implementation, promoting capacity building and technical assistance, and providing leadership and investment in support of the broader effort; (d) how public housing authority resources are engaged in implementation, promoting the appropriate mix of housing options and advancing local and regional plans; (e) what planning vehicles are in place to ensure that local implementation efforts are supported by regional, state and federal policies and programs, while informing these policies and programs for future refinement, (f) what mechanisms most effectively and efficiently ensure longer-term or permanent housing affordability and; (g) what private and public sector resources – including employer-assisted housing and density bonuses -- are being leveraged to demonstrate that sustainable communities investments promote both economic development and neighborhood stabilization in struggling communities as well as affordable housing near good jobs and good schools in more affluent neighborhoods.

Finally, CMAP and other Chicago region stakeholders have already outlined and shared with this Administration a document entitled [Advancing Livability Principles: Federal Investment Reform Lessons from the Chicagoland Experience](#). Please note that regional partners have also recommended a seventh Livability Principle to “conserve natural resources.” We are encouraged by the historic progress reflected in this Sustainable Communities Planning Grant Program Advance Notice and Request for Comment, and hope the Chicago region’s experience continues to inform national discussions.

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