

July 21, 2010 [by email]

Dear Mr. Deputy Secretary:

Attached are the assessment and grading chart that I prepared regarding how well the SCI NOFA incorporated the concerns and recommendations of Building One America (BOA). We had provided our ten recommendations as a formal letter to HUD, as a series of ten expanded commentaries (in manuscript), and subsequently as a joint publication of BOA and PRRAC. We also provided all materials to the DOT and EPA representatives. Phil Tegeler and I also had one meeting with your staff (which we appreciated).

We are very pleased that the NOFA responds fully to our two primary concerns:

- that regional equity goals must be at least co-equal with environmental sustainability goals; and
- that the planning grant program must be genuinely regional in scope, addressed to whole metropolitan, micropolitan, or urbanized areas.

There are many other aspects of the NOFA that we liked and, though we recognize that many influences helped shape the NOFA (most directly, the values and professional experiences of HUD staff under your leadership), we believe that our efforts had positive impact.

Nevertheless, the NOFA falls short in meeting the very mission that you have memorably characterized as “ending the tyranny of the ZIP code.” We had sought to provide an analytical framework and programmatic strategy for doing just that through requiring a) regional opportunity mapping, b) opportunity-based housing strategies governed by that “geography of opportunity,” and c) regional housing mobility programs to assure access to high opportunity communities for low-income, low opportunity community residents. The NOFA is basically silent on all three topics.

We also question the second-class status assigned to state government in proposed regional consortia. State government is the only player with sovereign authority over land use planning and zoning. In “little boxes” states, in particular, SCI comprehensive plans can only be translated into enforceable actions at the local government level if the state’s “rules of the game” compel such (as the

Washington and Oregon land use laws do). Our nation is littered with comprehensive regional plans devised by MPOs, county governments (in “little boxes” states), and non-profit groups (like New York’s Regional Plan Association) that are basically unenforceable, academic exercises. The great danger is that such will happen with SCI plans unless HUD, DOT, and EPA put the total weight of your grant-making behind all parties’ implementing the SCI plan (another area where the NOFA comes up short).

I gave the NOFA a grade of 72 which translates into a B minus. As stated in my cover letter, “in an era of grade inflation, that may sound like a poor grade” but I am really Old School and interpret a B minus as “pretty good.” In all candor, as I wrote, “the NOFA probably could not have scored an A unless the task of drafting the NOFA had been turned over to Building One America.”

My colleagues and I stand ready to assist you in any appropriate way with regard to evaluating SCI applications from a regional equity perspective, providing technical assistance on regional equity issues in the field, and, certainly, shaping an even better FY 2011 NOFA.

I am a major presenter at Building One New Jersey in Princeton this Friday, laying out a unified federal-state regional reform agenda. I am excited that you will be highlighting the event. Your colleague, Bryan Green, did an excellent job at Building One Pennsylvania last Friday in Lancaster and Deputy DOT Secretary John Porcari’s remarks were also on target. We appreciate the role of your office in helping line up both high-level federal spokesmen for Building One Pennsylvania.

Overall, despite our “tough love,” good job.

I’ll see you in Princeton on Friday.

David Rusk