

Building Communities of Opportunity Through the Sustainable Communities Initiative

These comments were prepared by PolicyLink in consultation with practitioners working in regions across the country.¹

PolicyLink is pleased to have the opportunity to offer comments on the Sustainable Communities Planning Grant Program to the Department of Housing and Urban Development. As decade-long leaders in the movement to build more equitable and sustainable regions² PolicyLink and our partners are deeply invested in the success of the HUD-DOT-EPA Sustainable Communities Initiative (SCI). SCI presents a significant opportunity to foster more equitable, sustainable, and competitive regions through collaborative and integrated regional planning.

The regional planning efforts supported by the grant program should strive for all neighborhoods to be sustainable communities of opportunity—places with quality schools, access to good jobs with family-supporting wages, quality housing choices, public transportation, safe and walkable streets, services, parks, healthy environments, access to healthy food, and strong social networks. There are multiple approaches to building communities of opportunity, including: revitalizing and expanding access to these opportunity structures in distressed neighborhoods; “opening up” opportunity-rich neighborhoods; increasing transportation access and mobility for isolated communities; reducing housing, transportation, and energy costs for working families; and linking low-income workers and firms to economic opportunities.

It is critical that HUD establish explicit criteria that require applicants to plan for and implement strategies focused on improving the lives of low-income people and revitalizing economically distressed neighborhoods in the region.

In our ten years of being involved in regional planning processes, it is our experience that **these efforts rarely have a significant focus on addressing racial and economic disparities** in income, wealth, health, and opportunity. Regional planning bodies have limited capacity or experience in planning for or implementing equitable development. While important efforts are being made, these efforts are almost always the result of sustained advocacy.

To ensure that the resources made available by this planning grant program make progress towards the partnership’s six Livability Principles, **we recommend that a threshold criteria be the inclusion of an organization with a demonstrated commitment and track record of addressing the needs of low-income people and people of color neighborhoods** (hereafter referred to as social equity groups) as either a lead applicant or in a strong governance role in the planning process.

¹ On March 4, 2010 PolicyLink and HUD jointly held a webinar, “Shaping The New HUD Sustainable Communities Program: What Advocates Need To Know,” that was attended by over 350 participants who provided comments integrated into this testimony, as well as in depth feedback from partners listed at the end of this document.

² PolicyLink has helped build a national regional equity movement through research, coalition building, policy formation, policy advocacy, regional planning consulting, the Equitable Development toolkit, three national summits, numerous regional summits, and the building of a national regional equity network, Demand Equity Now!

Additionally, we recommend that SCI prioritize the following activities in the scoring of applicants:

- **Regional housing plans that preserve and expand affordable homes** for low-income residents in areas near jobs and transit; those plans should specifically address the risk of gentrification and displacement in neighborhoods targeted for transit investments and increased density.
- **Transportation plans aimed at increasing access and mobility for low-income communities.**
- **Identification of priority investment areas in high-need and vulnerable communities** for infrastructure, housing, healthy food retail development, environmental improvements, and economic development.
- **Workforce strategies** that ensure that disadvantaged workers and firms are trained and hired in the building of infrastructure.
- **The inclusion of a health focus** aimed at planning for infrastructure investments that promote community health outcomes.

The Challenge—and the Opportunity

The need for a different course of regional development in the United States is clear. Over the past decade, social equity advocates have increasingly recognized the role of regional development patterns in maintaining and exacerbating racial and economic disparities. Fifty years of post World War II sprawl development had left low-income people and communities of color isolated in neighborhoods far from job centers, quality schools, services, and amenities—first in the “inner city” and increasingly in older, inner-ring suburbs and far-flung exurbs.³ Decades of research has confirmed that neighborhood environments make a difference in social and economic outcomes.

At the same time, progressive business interests, policy analysts, and political leaders also focus on regions as the key geographic unit for global economic competitiveness. A growing body of evidence indicates that inequitable regional development not only limits access to opportunities for people with the least resources – it also undermines the ability of the entire region to compete and grow economically. This is as true in mid-sized and economically distressed regions as in large metros.⁴

The environmental community has long recognized “bioregions” as the main organizing unit for environmental health, and the recent targeting of development patterns and the building sector for reducing the greenhouse gas emissions that contribute to global warming bring heightened focus on regions for environmental sustainability.

Yet while the region is the most significant unit for environmental, economic, and equity outcomes, regional planning faces significant barriers to integrating and coordinating planning, policy, and development across the sectors integral to creating sustainable communities of opportunity.

³ While city poverty rates in cities are still nearly twice as high as suburbs’, poverty rose nearly five times as fast in suburbs between 2000 and 2008. Elizabeth Kneebone and Emily Garr, *The Suburbanization of Poverty: Trends in Metropolitan America, 2000 to 2008*. Washington, DC: The Brookings Institution, 2010. Available at http://www.brookings.edu/~media/Files/rc/papers/2010/0120_poverty_kneebone/0120_poverty_paper.pdf.

⁴ Manuel Pastor, *Regions that Work; Cohesion and Competitiveness: Business Leadership for Regional Growth and Social Equity*; http://people.ucsc.edu/~mpastor/PERE/Regional_Equity/Cohesion_and_Competitiveness.pdf; Randall Eberts, George Erickcek, and Jack Kleinhenz, *Dashboard Indicators for the Northeast Ohio Economy*, Federal Reserve Bank of Cleveland, 2006: <http://www.clevelandfed.org/research/workpaper/2006/wp06-05.pdf>. (Study of 118 mid-sized metros found that regions with high levels of racial and income equality and a skilled workforce had the strongest levels of economic growth)

The Sustainable Communities planning grant program presents an opportunity to vastly increase the capacity of regional collaboratives to address the intertwined challenges of economic growth, social equity, and environmental impact. But without strong threshold social equity criteria embedded into the program, the multiple challenges facing lower-income people and high-poverty neighborhoods are not likely to be addressed. Experience has shown that residents of low-income communities and communities of color, and their advocates must have the opportunity to participate. Experience has also shown that strategies must explicitly address equity concerns at the front-end in order to produce more equitable outcomes.

For example, transit oriented development (TOD) is a key strategy for achieving goals for economic growth, inclusion, and sustainability. When implemented well, TOD can lead to multiple, synergistic benefits: lower housing and transportation costs; greater mobility; better access to jobs; economic revitalization; walkable neighborhoods that promote active living and prevent obesity; and reduced climate impacts. But the benefits of TOD do not automatically flow to the low-income communities and communities of color who live near the station. New TODs—and sometimes even plans for new transit stops or lines—can spark rapid appreciation in the costs of land and housing that can lead to gentrification and the displacement of vulnerable and lower-income residents.

Guiding Criteria to Ensure Equity in Sustainable Communities Planning Grant Applications

To maximize the ability of the Sustainable Communities Initiative to attain equity goals, we recommend that HUD encourage applicants to include the following strategies, and prioritize grant applications that include them:

- 1. Social equity leadership as core to both the application and planning implementation and governance.** Plans tend to be stronger, yield more equitable results, and have greater community support when area residents, neighborhood groups, and small business owners are involved in their creation. Community members possess invaluable knowledge of neighborhood needs and assets, and have important ideas to contribute. The most inclusive processes engage residents from the beginning, before major decisions are made, and throughout the planning and development process. Community-based organizing groups often catalyze greater resident involvement and can help government agencies successfully engage diverse community residents.

While regional planning efforts increasingly showcase new commitments to integrated planning and building of transportation infrastructure that supports sustainable, compact growth, very few regions have developed the tools to structurally include the leadership of cultural, historic, or disinvested communities. Those that have done so—such as the San Francisco Bay Area—have developed innovative strategies to ensure equity outcomes.

Implications for SCI

The criteria of grant allocation should require the genuine and demonstrated partnership of community institutions to engage, plan with, and deliver on their communities' futures.

Applicants should demonstrate:

- Inclusion of social equity groups in the proposed governance structure of the initiative
- A robust plan for community engagement from organizations with a demonstrated track record in effective engagement and policy advocacy in communities of color and low income communities in the region
- Budget line items and matching funds that show support for the proposed activities.

- 2. Regional housing plans to preserve and expand affordable homes for low-income residents in areas near jobs and transit, and address the risk of gentrification and displacement in neighborhoods targeted for TOD and increased density.** There are multiple benefits to locating housing that is affordable to working families near job centers and transit stops. Transportation and housing are the two biggest household expenses, and lower income families spend more for both of them, as a proportion of their take-home pay. By coordinating transit with compact, mixed-income housing development and preservation of existing affordable units, we can reduce both of these costs together. At the same time, transit provides a lifeline to jobs, schools, and services, and getting people of all incomes onto mass transit reduces carbon emissions.

Implications for SCI

- Include an innovations fund for regions that seek to develop new ways of ensuring equitable TOD
 - For regions with transportation plans, require regional housing affordability plan that contains strategies outlined above to qualify for grant
 - In regions with housing plan, require housing stability overlay on TODs in higher poverty communities, and housing affordability overlays in higher opportunity neighborhoods built on above strategies
 - Prioritize applicants who want to generate affordable housing resources through planning requirements
 - Require economic integration (inclusionary housing) of new housing built near transit
 - Prioritize preservation of affordability to make terms of housing subsidy consistent with terms of transit capital investments
 - Score applicants on mechanisms they will utilize to assess vulnerable neighborhoods' housing and commercial enterprise status and ensure its stabilization during construction and subsequent occupancy.
- 3. Transportation plans to increase access and mobility for low-income communities.** Transportation systems should provide viable choices and opportunities for low-income communities and communities of color to fully participate in the regional economy. Reliable public transportation is fundamental to an inclusive regional transportation system. Currently, transit access too often does not bridge the spatial mismatch between low-income households and suitable jobs.

Implications for SCI

Prioritize applications that

- Specifically improve transportation options and access for low-income communities
 - Demonstrate improved access and connectivity between job clusters and disadvantaged communities
 - Focus on connectivity of low-income communities to physical activity, healthy food and preventive health services
 - Foster affordability in TOD.
- 4. Prioritization of high-need and vulnerable communities for new public investments in infrastructure, housing, healthy food retail development, environmental improvements, and economic development.**

Lack of access and mobility in disadvantaged communities has been exacerbated by structural disinvestment resulting in a cycle of concentrated poverty. Strategic investments in infrastructure and economic development can reconnect these neighborhoods to the region and provide opportunity to local residents—a key regional equity principle for reducing disparities. Alternately, when major regional redevelopment projects target higher poverty, blighted neighborhoods—such as hospitals, public housing redevelopments, stadiums, or major transit hubs—grants to help residents and businesses conduct impact assessments are critical. Such targeted public investments can also help leverage critical private capital.

Implications for SCI

Prioritize applications that

- plan for or target investments in identified high-need areas
- Integrate social equity and livability principles around other regional infrastructure investments.

5. Workforce strategies that ensure that disadvantaged workers and firms are trained and hired in the building of infrastructure.

Infrastructure projects create large numbers of temporary jobs in construction as well as permanent positions. Transit agencies, local governments, and advocacy groups work to ensure these are good jobs that pay family-supporting wages, offer benefits, and go to local residents. Additionally, transit-oriented development provides the opportunity to support the growth and development of locally-owned small businesses that often hire local residents. Construction jobs, transit operating jobs, and small business can all serve to employ low-income people and communities of color.

Implications for SCI

Prioritize applications that:

- Identify key workforce development partners for the planning or implementation effort
- Strengthen mechanisms used to connect jobs to local residents including: community benefits agreements; local hiring and minority/disadvantaged business contracting programs; recruitment protocols; priority notification; local recruitment and notification centers; job training programs; contractor standards; and extension of prevailing wage and living wage to privately-funded jobs. Some of these are exemplified in federal transportation measures (Title VI); HUD’s local hiring (Section 3) and HUD’s disadvantaged firm goals
- Create a job training purse and pipeline
- Encourage small local firms to locate or remain in TOD hubs and provide support during construction or relocation phases.

6. Health equity leadership is included in the application and planning processes, and plans incorporate health-focused strategies. Preventing disease means creating healthy community environments, including neighborhoods, schools, childcare centers, and workplaces. Research has demonstrated clear links between physical environments – such as housing, transportation, and environmental quality –and health. Communities with walking paths, parks and recreational facilities have more active residents.⁵ Residents who use public transit, for example, are less likely to be obese.⁶ And communities that lack access to healthy food or are overwhelmed with unhealthy

⁵ Physical activity research references - IOM (Institute of Medicine). 2005. *Preventing Childhood Obesity: Health in the Balance*. Washington, DC: National Academy Press

⁶ L.D. Frank, M. Andresen and T.L. Schmid, “Obesity Relationships and Community Design, Physical Activity, and Time Spent in Cars,” *American Journal of Preventive Medicine* 27, no. 2 (2004): 87-96, <http://www.act-trans.ubc.ca/documents/ajpm-aug04.pdf>

food higher density of unhealthy food outlets have higher rates of diabetes than communities with healthy food access.⁷ Not all communities are created equal when it comes to opportunities for healthy living: low-income communities and communities of color have fewer grocery stores that stock healthy fresh food and are more likely to be unsafe for children to walk to school or play outside.⁸ Residents who live in unhealthy environments are more likely to suffer from diabetes, asthma, heart disease, and high blood pressure.

Implications for SCI

Interagency regional planning should insure community health is considered and accounted for in all planning processes by prioritizing applicants that:

- Include involvement from public health professionals
- Incorporate a focus on increasing access to affordable, healthy food in the region's "food desert" communities, and fostering equitable and sustainable regional food systems that expand opportunities for urban agriculture, local small- and mid-sized farms, and economic opportunities in the food industry
- Utilize a health equity analyses to measure the health benefits of a project, plan or program
- Include a 'health element' that promotes health equity⁹ and prevents chronic disease, injury and respiratory illness through healthy planning, land use and development.

Conclusion

Prioritizing these arenas through guidance and scoring criteria in the NOFA will create game changing plans and demonstrations throughout the nation. (Please see responses to specific HUD questions attached). PolicyLink looks forward to working with the partnership to share best practices and field leaders who can help aspiring regions implement these transformative strategies.

⁷ PolicyLink, UCLA Center for Health Policy Research, California Center for Public Health Advocacy. April 2008. "Designed for Disease: The Link Between Local Food Environments and Obesity and Diabetes."

<http://www.policylink.org/site/apps/nlnet/content2.aspx?c=IkIXLbMNJrE&b=5136581&ct=6997183>. Accessed March 9, 2010.

⁸ Ibid.

⁹ Health equity means that everyone has an equal opportunity to prosper and achieve his or her full health potential

Comments in Response to Specific Questions in the Advanced Notice

Category 1: Regional Plans for Sustainable Development.

What specific types of eligible activities would support this effort and which parties should be part of the regional planning process?

Eligible activities should include:

- **Community data collection** including needs assessments and social equity mapping to establish a baseline and set targets that include attention to poverty and racial concentration, social indicators, housing affordability, and mapping the location of opportunities for employment, quality schools, fresh food, parks and open space, health centers, and other amenities.
- **Educational resources and tools** to communicate the results of opportunity mapping and social equity analysis to members of historically marginalized groups and residents of communities of concentrated poverty, to help communicate the historical background, opportunities, goals and rationale, and to encourage participation in regional planning efforts.
- **Authentic community engagement**, including convening and facilitation of a caucus or advisory committee with decision-making authority that involves resident leaders and community organizations who can ensure a community perspective throughout the planning process; and grants to support community participation.
- **Training and technical assistance for planning partners** for activities such as understanding race effects of transit policy to increase the effectiveness of community engagement efforts and inform efforts to target investments to reduce economic and racial inequities in the region.

Key participants should include:

- **Partners with a proven track record working with low-income people and communities of color should constitute at least one-third of participants in the governance structure** established for the regional planning process. This might include organizations or coalitions with proven social equity leadership and credible relationships with community members from under-invested communities at the neighborhood or regional levels in housing, land use, environmental justice, community revitalization, transportation and reduction of spatial inequality.
- **Incentives should also be provided for the inclusion of partners that will address critical public health issues, including:** food access, public health and reducing health disparities, air quality, clean drinking water, brownfields and pollution issues, community public safety and comprehensive planning for people re-entering from jails and prisons
- **Commitment by applicants (or as co-applicants)¹⁰ and other organizations to meaningful partnerships**, in the form of MOUs and reflective budget items should be demonstrated for grant funding.

¹⁰ Other federal agencies have recognized the value of modifying grant and program policies to facilitate multi-disciplinary research teams such as community-based participatory research, allowing co-applicants for federal funding. A potentially transferable model can be found in policies adopted by the Office of Science and Technology Policy (published in the Federal Register September 24, 2007) and implemented by federal agencies such as NIH and the HHS Health Resources and Services Administration (HRSA) Rural Health programs.

What elements should be part of the plan, such as a region-wide vision and statement of goals, long term development and infrastructure investment map, implementation strategy and/or funding plan?

- **A vision and specific goals related to social equity**, including improved opportunities for low-, very low- and extremely-low income families to live in proximity to opportunities for work, healthy food, safe physical activity and recreation, and high quality educational opportunities.
- **Identification of high-poverty communities in the region**, as well as neighborhoods in which the number of households living in poverty has increased significantly in recent years.
- **Identification of opportunity corridors** in the region.
- **Baseline needs assessment** of high poverty neighborhoods.
- **Transportation connectivity between poverty neighborhoods and opportunity corridors.**
- **Specific goals and strategies that will improve access to job centers**, healthy food, opportunities for safe physical activity and recreation, and safe routes to high quality schools and public transportation for residents in those communities.
- **Plans, goals and strategies to preserve and increase the availability of affordable housing and transportation access** to very-low and extremely-low-income households and stabilize neighborhood-serving businesses in neighborhoods that will be targeted for investments. These plans should anticipate and mitigate the affordability impacts likely to result from improvements in transit or other transportation infrastructure.
- **Priority investment areas for new infrastructure** investment in higher poverty communities.

How can citizens best participate, such as through a requirement for participation in a minimum number of public meetings to ensure broad regional consensus?

Authentic community engagement should be required and incentivized through a combination of:

- **Threshold or minimum criteria for all applicants**
- **Scoring criteria used to competitively evaluate and select grantees**
- **Conditions of compliance with grant program requirements**

Scoring criteria used to evaluate grant applications should include consideration of the capacity and track record of the applicant and partners in working with low-income people and communities of color, and the proposed activities and resource commitments at every stage of planning and implementation activities. For example:

- Community residents and community-based organizations should be engaged in data collection and participatory research to inform and support the planning effort.
- Partners should have governing boards and workforce that reflect substantial participation by residents of low-income communities and other persons from groups that have been historically under-represented or marginalized.
- Grantees should be encouraged to set aside a portion of grant funds to facilitate community engagement and participation, and should be permitted to use grant funds for expenses such as transportation, child care, translation, food, training for civic engagement, etc.)

Scoring criteria should consider evidence such as: number and types of forums for community engagement and levels of participation, number of low-income residents who are active participants (paid or volunteer) in working with project partner(s) to plan and implement neighborhood planning and improvement activities, and track record of engagement in policy change related to community outcomes.

In addition to community engagement/resident leadership in developing this proposal for a planning grant, and proposed activities that will be part of the planning process, the applicant, co-applicant(s) and/or project partner(s) should demonstrate current and recent history of community engagement in other cross-sector collaborative initiatives or activities that improve public safety, achieve neighborhood outcomes consistent with one or more of the Livability Principles.

As a condition of grant funding, there should be specific requirements around:

- **Information provision to the public regarding the structure of the planning process**, including established workgroups, timelines for public meetings, agencies or individuals with designated roles and authority, decision-making process and timeframe, etc. Grantees should adopt and make widely available (e.g. posting on a public web-site) written policies regarding public participation.
- **Language access** for community residents who are not proficient in English.
- **Culturally relevant outreach activities** to inform and solicit participation in the planning process by residents who reflect the range of incomes, ages, communities and ethnic groups living in the region, with a particular focus on soliciting participation by people who live or work in communities of concentrated poverty.
- **Accessible meeting locations** for low-income residents, including schools and community facilities, and also locations that are readily accessible by public transportation.
- **Reasonable accommodations** to facilitate participation in the planning process by people with disabilities.

Should Regional Plans for Sustainable Development be expected to harmonize and be consistent with HUD, DOT, and EPA-required plans and, if so, how? Should Regional Plans for Sustainable Development show a linkage to local formula-based programs supported by HUD, DOT, and EPA; and, if so, to what extent should such linkage be required?

Yes, regional plans should be aligned with applicable state, regional and local plans for investments in affordable housing (e.g. Consolidated Plan, Tax Credit Allocation Plan, PHA Plan, Continuum of Care Plan) **transportation** (RTP, MPO, RTA, DOT investment plans), and other infrastructure investments (Fresh Food Finance, Community Health Centers, Schools Master plans, Parks, Water and Sewage).

This requirement should be implemented with flexibility, recognizing that a regional plan can provide a framework to leverage resources controlled by multiple jurisdictions with varying levels of commitment at the start of the planning process. It may take time to align plans and spending priorities across jurisdictions. HUD should use scoring criteria that will incentivize commitments from participating jurisdictions, through mechanisms such as Letters of Intent that articulate a willingness to use the regional plan to guide and align future spending.

An eligible use for the Sustainable Communities planning grant dollars could also be to support efforts to help align these plans.

Category 2: Detailed Execution Plans and Programs

What specific types of activities should be eligible for funding in this category?

- **Deepening social equity components of existing plans.** More advanced planning and planning to strengthen elements of an adopted regional plan or vision to focus greater attention and enhance strategies to address issues of equity and opportunity for low-income and historically marginalized residents and neighborhoods, with a particular focus on affordable housing and access to jobs and amenities that improve public health.
- **Aligning resources.** Efforts to align plans and budgets across local jurisdictions and sectors based on the regional plans and Livability Principles.
- **Increasing engagement and capacity of communities of color.** Activities (including those identified for Category 1 grants) to increase community engagement among residents and community leaders from under-represented or marginalized communities and to build civic capacity (supported with a portion of federal grant funds and/or investments from philanthropy or private sector that may be leveraged by the grant) including the capacity to influence or shape policy, practices or resources in the public, non-profit, for-profit and philanthropic sectors that will lead to sustainability and contribute to improved outcomes for individuals, families and communities over the long run.
- **Technical provisions that enable implementation of the plan.** Activities that may help to expedite future implementation of infrastructure projects included in the regional plan, including zoning changes and acquiring or transferring title to land.

What criteria should be used to evaluate whether a previously adopted regional vision is consistent with the Livability Principles discussed above?

The regional plan or vision clearly identifies:

- **Spatial mismatch:** The needs and characteristics of people and neighborhoods that are most impacted by the spatial mismatch between affordable housing and jobs, or most likely to be impacted by planned infrastructure improvements and investments.
- **Demographic focus on high poverty populations:** Reflects a clear understanding of the region's populations and subpopulations and the scale of investment needed to achieve the intended outcomes for the region.
- **Workforce and health status:** Includes strategies to increase access to employment opportunities and amenities that improve public health for residents with the lowest incomes and/or highest rates of joblessness.
- **Most housing-transportation burdened communities:** Includes strategies to reduce the percentage of low-, very-low, and extremely low-income households in the area who pay more than 65% of their income for housing and transportation expenses.
- **Transportation need between low income communities and job centers:** Strategies to expand opportunities for employment and linkages to workforce education and training for residents from high poverty areas and other disadvantaged workers, including a focus on opportunities connected to planned infrastructure projects and public investments.
- **Neighborhood investment and stabilization strategies:** Has plans for stabilizing and revitalize communities, neighborhoods and commercial centers supported by existing infrastructure and transportation, particularly in high-poverty areas

Should the amount of local and contributed resources to support, expand, and enhance the development of implementation strategies be rewarded in application scoring or are there other means to leverage other funds and resources?

HUD should provide extra scoring points for both philanthropic commitments by community development and public health grantmakers **and public sector commitments of resources** dedicated to high poverty community needs and infrastructure.

Category 3: Implementation Incentives.

Would “pre-certification” be an added value and, if so, what programs should this approach apply to?

Yes—this is a promising model for aligning investments from various federal agencies and programs and reducing the costs and uncertainties for applicants and grantees.

What criteria should be considered for meeting the “pre-certification” status?

Include criteria that will explicitly focus on social equity in assessing consistency with the Livability Principles including a plan for preserving housing affordability in the neighborhood(s) impacted by the proposed project and a workforce plan to provide employment and contracting opportunities for low-income residents and businesses.

Is the direct support of implementation activities appropriate within this program given the limited amount of resources and the expected modest size of grants?

It makes sense on innovative, model, pilot projects that demonstrate social equity outcomes. Given size of grants, applicants would obviously be bringing significant other resources to the table. These should be given to game changing projects that go beyond housing and transit to deeper TOD that creates health connections.

What criteria should be used to judge that an applicant successfully demonstrates that it has an adopted regional vision and that the project for funding under this category is truly catalytic?

Because of limited funding available for this category of grants, HUD should target these resources to investments that will significantly benefit neighborhoods or regions that are economically distressed. Criteria for defining distressed communities would include high and/or significantly increasing rates of poverty, unemployment (and to the extent available indicators of child hunger, which may reflect limited household income available after paying housing and transportation costs) as well as indicators of reduced fiscal capacity in state or local government (e.g. significant declines in tax revenues over the past 2 years).

Additional criteria are suggested below:

- Project will contribute to revitalization of a neighborhood or region of concentrated poverty by supporting economic development, employment opportunities and/or the creation of high quality affordable housing or community amenities that improve public health
- Project will link residents in neighborhoods of concentrated with opportunities for work, healthy food, safe physical activity and recreation, and high quality educational opportunities.
- Project incorporates best practices that reduce or avoid displacement of vulnerable community residents during implementation of revitalization / capital improvement projects.

- Project partner(s) has demonstrated track record of providing employment to local residents who have substantial barriers to employment (e.g. disability, limited education, history of incarceration).

Specifically, what criteria should be considered for a project to be catalytic?

For this category of grants social equity focus should be considered both catalytic and threshold. These grants will provide an extraordinary chance to demonstrate innovative and replicable models of investments that will significantly expand opportunities for all residents of a region by linking housing, transportation and infrastructure investments.

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