Thank you for this opportunity to comment on the Advance Notice of the Sustainable Communities Planning Grant Program. At the March 8, 2010 listening session, speakers asked that participants tell the story of how these grants might be used in Connecticut, and how they can help build more sustainable, livable communities. In response to that request, I would like to begin with some background on how these grants can benefit the Capitol Region of Connecticut. The final section provides some specific comments on the Advance Notice document.

**Who We Are and How the Program Can Benefit the Capitol Region**

By way of background, the Capitol Region Council of Governments (CRCOG) is one of Connecticut’s 15 regional planning organizations, serving the City of Hartford and the 28 surrounding suburban and rural communities. We are established under the authority of the Connecticut General Statutes to serve as voluntary associations of local governments and regional planning agencies for our areas of operation. CRCOG also serves as the Metropolitan Planning Organization, or MPO, for transportation planning purposes under the authority of federal transportation legislation. The scope of our planning activities and programs include the following functional areas: transportation (including transit, bicycle and pedestrian initiatives, and environmental justice), housing, land use, environmental protection, open space and farmland preservation, municipal services, and public safety and homeland security (including pre-disaster natural hazard mitigation planning).

We are very excited about the Sustainable Communities Planning Grant Program, and its potential to forward integrated planning in support of sustainable community development. We believe that this program will be particularly useful in helping us move forward with planning for transit oriented development associated with two major transit projects about to be implemented here: the New Britain to Hartford Busway, and the New Haven to Springfield Commuter Rail. It will also be useful in forwarding planning and redevelopment within other transit corridors in the region, as well as selected sites that have good access to on-street bus service.

CRCOG and some of the communities along these transit corridors have already completed preliminary station area planning that focused on conceptual site design and assessing market opportunities in proposed station areas, and identifying possible strategies to incent development.
We have also worked with these towns to develop and adopt transit oriented development principles that can be used to guide future planning and development. This planning is an outgrowth of the adopted Capitol Region Transportation Plan (2007 and previous versions), and the Plan of Conservation and Development for the Capitol Region (2009 and previous versions). Through our EPA-funded MetroHartford Brownfields Assessment Program, we have helped communities conduct environmental site assessments and remedial action plans for sites near proposed stations, which will be used to assist in municipal and/or private redevelopment efforts. We anticipate that Sustainable Communities Planning Grant Funds can help us move these plans to reality by supporting the integration of planning and development within whole transit corridors, and the development of more detailed station area plans at specific sites.

The Sustainable Communities Planning Grant Program acknowledges that coordinated regional and municipal planning is necessary to create strong, sustainable communities. It is the regional, corridor-level planning and coordination that will help us to implement consistent, transit supportive development principles, and consider how the individual municipal activities will be related. But we also need to incorporate the regional planning and principles into the municipal level site planning, zoning and subdivision codes that will control how land is developed, and how local infrastructure investments are made. Our ultimate goal is to develop regional plans and local zoning codes for mixed use development that will link jobs, affordable and market-rate housing, and pedestrian and bicycle systems within the half-mile radius of proposed stations along the new bus rapid transit and commuter rail systems—for the economic and social benefit of the region as a whole. CRCOG is also studying other transportation corridors within the region, and this program will provide an opportunity to apply model codes that better connect a variety of land uses and transportation in other areas where on-street bus service, housing and economic development opportunities are closely linked.

We are also very interested in integrating sustainable design and development practices into the development and redevelopment that will likely occur along the Hartford-New Britain Busway, the Springfield-New Haven Commuter Rail Line, and also other areas of the region that are well-served by on-street bus service and water and sewer infrastructure.

In 2008, we were fortunate to receive an award of Smart Growth Implementation Assistance from the U.S. EPA to explore how the principles of sustainable, mixed use development could be incorporated into the Incentive Housing Zones being developed in the region through the Home Connecticut Program, and other community planning efforts.

The end product of our collaboration with EPA and four of our member communities was an interactive workshop and the development four separate reports that speak to how sustainable development guidelines can be applied to help towns and developers:

- Select prosperous smart growth locations for housing and economic development;
- Implement neighborhood design and placemaking that creates vibrant, walkable neighborhoods; and
- Apply green infrastructure and energy efficient building techniques to new and rehabilitated development, in order to help reduce carbon emissions in the region

During the same time period, we also collaborated with the Regional Plan Association on another project that looked at what impact changing development patterns within transit corridors can have on reducing carbon emissions. The final report of that effort, Growing Economy, Shrinking Emissions (2009) reinforced the point that by developing in a more compact manner within transit corridors, we as a region can achieve real, positive impacts on reducing greenhouse gas emissions.
We believe that the Sustainable Communities Planning Grant Program can help us develop models that will help towns apply the CRCOG/EPA sustainable development guidelines to projects throughout the region—so that we may begin to address our long-term climate change goals.

**Comments on Sustainable Communities Planning Grant Program**

In order to achieve the objectives of TOD in appropriate locations, and more sustainable development throughout the region, we ask that you consider the following in the development of the Sustainable Communities Planning Grant Program Notice of Funding Availability

1. The competitive grants should be flexible and multi-year, and should require a cross-disciplinary approach to planning issues. RPO’s/MPO’s should be required to be partners in any application, as these agencies provide the framework for multi-jurisdictional planning, and provide the linkage between local and state government.

2. RPO’s/MPO’s such as CRCOG should be eligible applicants under this program, so that we can continue to carry out planning and implementation activities in partnership with our member communities, and other regional stakeholders. RPO’s/MPO’s should also be allowed to serve as the lead agency in a multi-jurisdictional grant application.

3. We would also like the ability to partner with other RPO’s/MPO’s in grant applications—both within Connecticut and across state lines—when those combined geographic areas are the most logical area within which to carry out the integrated planning which is contemplated under this grant program.

4. In addition, we would like the ability to use previous regional planning and transportation investments as a springboard for follow-up work to be funded through the Sustainable Communities Planning Grant Program. In other words, we don’t want to have to go back to square one to recreate regional plans and approaches where they already exist, in order to be eligible to apply for Category 2 or Category 3 grants. It would be reasonable to require a demonstration of how previously developed plans and investment decisions are consistent with the Partnership’s Livability Principles as a threshold for Category 2 or Category 3 grant eligibility.

5. The HUD Grant Program should create a common set of performance goals/metrics.

6. We would like the flexibility to be able to apply in one or more of the three grant categories, if that makes sense within the context of what we wish to accomplish with Sustainable Communities Planning Grant funds. For instance, there may be a need for using visioning exercises/workshops (Category 1 Grant) to gain support for code changes (Category 2 Grant) necessary to implement transit oriented development.

7. We would like to see as much flexibility as possible in terms of eligible activities that are consistent with the Sustainable Communities Planning Grant Program objectives. Eligible activities that HUD has identified in the Advance Notice and your Listening Session presentation provide reasonable examples of eligible activities. We ask that you add code reform (zoning and subdivision) to the list of eligible activities, as this will be critical to implementing transit oriented development and other sustainable development strategies.

8. We ask that the grant guidelines provide as much flexibility as possible in assembling the match component of the grant, including allowing in-kind contributions, and application of local, state and other federal grant funds which support the proposed objectives of the grant application.

The Sustainable Communities Planning Grant Program provides us with a unique opportunity to integrate housing, transportation, and environmental concerns in our community development activities. Thank you for the opportunity to comment on the Advance Notice.