

## Principles to Guide Reform of Federally Required Planning Processes To Achieve Inter-departmental Coordination

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- 1. Any federally required plans must be based on actual and anticipated human activity in a region (metropolitan or rural), not single political boundaries.** Congress should implement this principle by changing existing statutes, such as that establishing the Comprehensive Housing Affordability Strategy (CHAS); until then, utilizing existing law federal agencies must create incentives and/or requirements that foster integration of housing, transportation, and environmental plans among adjoining jurisdictions.
- 2. The provision and retention of housing affordable to families and individuals with the lowest income must be a high priority.** Affordability must be defined as consuming no more than 30% of income for rent or mortgage, plus utilities – unless an alternative based on a full family budget approach is implemented.
- 3. Federal agencies, including HUD, DOT, EPA, and others as appropriate, must integrate (not merely coordinate) their federally required plans.** In addition, all HUD-oriented plans must be integrated, including the Consolidated Plan, Public Housing Agency Plan, National Housing Trust Fund Allocation Plan, Anti-Displacement Plan, Continuum of Care Plan, Ten-Year Plan to End Homelessness, Analysis of Impediments to Fair Housing Choice, and Qualified Action Plan.
- 4. Plans must establish relative priorities based on the severity of need, and allocate federal funds proportionately to implement programs that meet the relative priorities.** Plans must identify the relative severity of needs by demographic characteristics, tenure type, and income categories of extremely low, very low, low, moderate, and middle income.
- 5. Plans must state how affirmatively furthering fair housing choice will be carried out,** including considerations of choice pertaining to affordable public transportation and access to basic goods and services, employment centers, and educational opportunities.
- 6. Plans must include (not “certify” the existence of) an anti-displacement component similar to Section 104(d) of the CDBG statute.** Plans must state, especially for people with the lowest income: how displacement will be minimized; where affordable, location-efficient replacement homes exist; and what assistance will be provided.
- 7. Planning processes must include, at a minimum, the details of the public participation requirements in the CDBG and Consolidated Plan laws and regulations** which require, among other features, provision for and encouragement of participation by persons with low income living in areas affected by the federal programs.
- 8. Public entities must utilize federal funds in a manner consistent with their plans** in order to receive future funds governed by those plans, and to avoid sanctions including but not limited to repayment of funds.