



101 Constitution Avenue, NW, Suite 600 West, Washington, DC 20001

Arizona State University  
California State University –  
13 Member Schools  
Cleveland State University  
Florida International University  
Georgia State University  
Indiana University-Purdue  
University Indianapolis  
Morgan State University  
North Carolina State University  
Ohio State University  
Portland State University  
State University of New York –  
6 Member Schools  
Temple University  
Tennessee State University  
University of Akron  
University of Central Florida  
University of Cincinnati  
University of Colorado – Denver  
University of Houston  
University of Illinois at Chicago  
University of Louisville  
University of Massachusetts –  
Boston  
University of Memphis  
University of Minnesota  
University of Missouri –  
Kansas City  
University of New Mexico  
University of New Orleans  
Virginia Commonwealth  
University  
Wichita State University

March 12, 2010

The Honorable Shaun Donovan  
Secretary  
U.S. Department of Housing and Urban Development  
451 7th Street S.W.  
Washington, DC 20410

Dear Secretary Donovan:

On behalf of the Coalition of Urban Serving Universities (USU), we are pleased to submit the following comments regarding the funding categories, eligible activities, and eligible entities for the Department of Housing and Urban Development's (HUD) Sustainable Communities Planning Grant Program.

USU is a network of 46 public urban research universities that represents every region of our country. University presidents created USU to improve urban life and America's competitiveness in the global economy. USU is focused on three major issues – creating a competitive workforce, building strong communities, and improving the health of a diverse population.

Institutions of higher education possess a broad range of skills and resources – intellectual, human, technological, and social – to engage in urban opportunities. They play active roles in shaping the future of their cities and regions, as unlike corporate headquarters they can not pick up and leave a community or region when hardships occur.

### **Proposed Funding Categories and Eligible Activities**

USU's needs assessment survey of our member's community engagement activities concluded that they are at various stages in advancing such efforts. We are extremely pleased that the Sustainable Communities Planning Grant Program will establish three separate funding categories and provide a range of options for regions based on how far along they are in developing and implementing sustainable plans.

Through the work of our cities and regions, USU institutions have learned that successful planning should focus on several key activities:

- Developing analytical business tools used for evaluation of investment decisions;
- Creating economic development and redevelopment models that can be customized to specific economic and environmental profiles or goals of a given community;
- Collecting relevant data to inform program planning and pursuing financial and other resources; and
- Executing effective promotion or communications efforts, such as advocacy, relationship building with policy makers, presentations to policy boards, and influencing stakeholders who will be impacted by the intended development.

The Honorable Shaun Donovan

March 12, 2010

Page 2

In general, activities should be targeted to the community that will be affected by the regional development. In order for community members to become invested, they need to understand the tangible benefits that they will receive as a result of the plan and implementation.

USU supports HUD's intention to reward applicants that provide local matching funds and resources. Our institutions have found that overall investment in regional development is maximized and sustained over time when partners are contributing financial support to a project. While it is important for HUD to encourage matching funds to ensure that regional partners will follow through on their roles and projects, we urge the agency to establish a matching amount that is large enough to leverage local investment but not so large that it creates too much financial burden upon local entities.

USU also supports using catalytic criteria for awarding Category 3: Implementation Incentives. One criterion that should be considered is whether an applicant recycles capital by creating a mechanism to reinvest in profits to further sustainable business development.

#### **Entities Eligible for Funding**

USU supports HUD's goal of creating multijurisdictional partnerships, as our universities are often involved in regional partnerships across multiple cities, counties, and states. In addition to the government, civic, philanthropic and business entities outlined in the grant announcement, non-profit organizations such as anchor institutions, community finance, and community development corporations should also be required partners. Anchor institutions (e.g. universities and hospitals) are important assets to their regions in terms of capital, jobs, and expertise. Involvement of community organizations will increase local stakeholder interest and support if they are included in the partnership that applies for a grant.

USU discourages HUD from limiting non-government or non-regional entities from being designated the lead agency for this grant. Different geographic regions are composed of a range of entities that drive regional development. USU members are often asked to lead various development activities for their regions and beyond. The lead agency should be determined among the partners applying for the grant and based on local needs and leadership.

The Sustainable Communities Planning Grant Program presents an important opportunity to strengthen and expand the economic viability and sustainability of the many metropolitan regions USU members represent. Our institutions are excited to participate in this grant process and urge you to incorporate our recommendations into the final Notice of Funding Availability.

Sincerely,



Nancy L. Zimpher  
Chair, Coalition of Urban Serving Universities  
Chancellor, State University of New York