



OFFICE OF POLICY DEVELOPMENT
AND RESEARCH

U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
WASHINGTON, DC 20410-6000

November 24, 2010

Mr. Ross Rutledge
Desk Officer
Office of Management and Budget
New Executive Office Building
Washington DC 20503

Dear Mr. Rutledge:

The Department is seeking emergency review of the Paperwork Reduction Act requirements for a new information collection which supports the Transformation Initiative: Sustainable Communities Research Grant Program, which was Authorized in the Appropriations Act, 2010 (Pub. L. 111-117 approved December 16, 2009).

The Notice of Paperwork Submission (copy enclosed), proposed for immediate Federal Register publication, explains the burden of the collection requirements and invites public comments on them. In compliance with the requirements of 5 CFR 1320.13, this letter requests emergency processing within 14 days from the date of this letter. The collection of this information is necessary because following the normal clearance procedures is reasonably likely to result in public harm if normal clearance procedures are followed.

The United States is facing an interlocking set of housing crises: at the end of the fourth quarter of 2009, more than 11.3 million, or 24 percent, of all residential properties with mortgages were “underwater” (the current value of the asset is below the amount still owed); at least 1.59 million people nationwide are homeless; between 2005 and 2007, the nation experienced a net loss of 1.2 million affordable rental units for renters with incomes below 50 percent of area median income. And more American families are burdened with higher transportation costs, which—in addition to rising energy and oil prices—add an additional strain on household budgets. State and local governments are facing budget shortfalls that are challenging their ability to make future investments in green technologies, transportation and infrastructure improvements, and affordable housing. These governments have implemented numerous initiatives to address these challenges. Their work could serve as best practices for the Federal government, which is also prioritizing cost-effective strategies to leverage resources to meet housing and infrastructure challenges. The research findings that will be evaluated will provide the clear and compelling evidence for how HUD and its partners should craft policy.

In addition, the Department of Housing and Urban Development recently announced the first round of grant recipients for two new sustainable communities planning programs—the Regional Sustainable Planning Grants, and Community Challenge Grants—awarded by HUD and in partnership with the U.S. Department of Transportation (DOT). The research to be conducted under this NOFA is intended, in part, to identify best practices, model policies, and performance measures for sustainable communities that would support the implementation work by grantees of

this inaugural program. The research to be conducted will allow HUD to have baseline data on each of the sustainable communities involved in the HUD and the joint HUD-DOT Challenge Grants. A delay in the issuance of this research NOFA will result in HUD's not being able to collect the baseline data which is needed to compare the impacts from the start of the grants to their performance end dates.

Further, the Federal government needs to have the information that these studies will produce to assist HUD in formulating policies and programs for the FY 2013 (as well as FY 2014) budget submissions. This will also potentially impact the DOT budget process. Any delays in receipt of the research results will limit the availability to assess work conducted under these grants to determine if these programs have a positive impact as a result of the initial design or if adjustments need to be made in the future.

Harm will therefore accrue to the HUD and its partner agencies that are working together to address achieving decreases in the carbon footprint of America's communities and thereby allowing the government to be less reliant on fossil fuels; encouraging new patterns of development based on the Six Livability Principles for Sustainable Development; and providing for greater educational and employment opportunities for low- and moderate- income persons through the placement of housing close to schools and jobs.

Sincerely,

Kevin J. Neary

Deputy Assistant Secretary for Research, Evaluation, and Monitoring