



March 12, 2010

Ms. Shelley Poticha  
Director  
Office of Sustainable Housing and Communities  
Department of Housing and Urban Development  
451 7th Street, S.W. Room 10180  
Washington, DC 20410

Re: Docket No. FR-5396-N-01

Dear Ms. Poticha;

The National Safe & Healthy Housing Coalition (“Coalition”) is pleased to respond to HUD’s request for comment on its *Sustainable Communities Planning Grant Program Advance Notice*. We are a broad, voluntary, non-dues coalition of organizations working to improve living conditions in America’s homes – and especially low-income households – by reducing serious indoor health and safety hazards.

Low-income families, older adults, persons with disabilities, and communities of color continue to bear a disproportionate burden of unhealthy housing and neighborhood conditions. These conditions not only cause millions of preventable illnesses and injuries, but they cost billions of dollars in health care treatments and lost productivity.

We applaud HUD and Congress’s efforts to promote sustainable housing through the creation of your office, the proposed grant program, the HUD-DOT-EPA Partnership, and related activities. The Partnership presents a unique opportunity to reconnect the planning and public health communities—disciplines that banded together to battle infectious disease at the turn of the 20<sup>th</sup> century. Today, these agencies have a new challenge—battling the chronic diseases that plague our nation, including asthma, diabetes, obesity, and anxiety and depression. Studies show that thoughtful land-use planning can indeed mitigate the alarming increase in these diseases.

We were encouraged by several references to healthy communities in the Advance Notice:

A top priority of the Administration is to build . . . healthy, opportunity-rich communities.

\* \* \* \*

The Partnership will coordinate policies and programs in support of six Livability Principles:

\* \* \* \*

2. Promote equitable, affordable housing . . .

\* \* \* \*

6. Value communities and neighborhoods . . . by investing in healthy, safe, and walkable neighborhoods . . . . (emphasis added)

We agree and believe strongly that all of HUD’s sustainability efforts should incorporate public health as a priority. In addition to the emphasis on healthy neighborhoods, we would like HUD to promote safe and healthy *dwelling*s. The indoor environment is often an underappreciated element of sustainability initiatives. Yet, Americans – and especially children – spend nearly 90% of their time indoors. Neighborhoods and homes are inextricably linked and we therefore we should pursue the dual goals of healthy homes in healthy neighborhoods.

Specifically, the words “health” or “safety” were absent from the *Advanced Notice’s* description of the *Sustainable Communities Planning Grant Program* or the *Solicitation of Comments* section and from the proposed funding categories, eligible activities, eligible entities and selection criteria. Thus, there seemed to be an inadvertent disconnect between this exciting new effort and the programs, goals and investments HUD and EPA have already made in safe and healthy housing through the HUD Office of Healthy Homes and Lead Hazard Control, the EPA Office of Children’s Health Protection, the Centers for Disease Control and others.

Given that a primary purpose of the Partnership is to better coordinate the activities of existing offices and programs among HUD, EPA and DOT, and given that the primary purpose of the proposed grant program is to better coordinate similar activities at the regional level, we urge HUD to promote public health, and especially healthy housing, throughout the proposed grant program, and we offer the following specific changes:

**Main Elements of a Regional Plan and Implementation Strategy**

In Section II, *Sustainable Communities Planning Grant Program* (and elsewhere), HUD sets forth the desired content for the Regional Plan and/or Regional Implementation Strategy. We encourage you to send a strong signal that Americans’ health and safety are co-equal priorities for your office generally, and that all regional plans must ensure the preservation and creation of healthy homes that are affordable to low income households. Specifically, we recommend clarifying the definition of a Regional Plan as follows:

[A] Regional Plan for Sustainable Development would be a plan that:

- A. Identifies housing, public health, transportation, economic development, land use, environmental, energy, green space and water infrastructure priorities and goals in a region . . . .

**A. Proposed Funding Categories and Eligible Activities**

Eligible Activities: In this section, we encourage you to define the types of eligible activities to include promoting safe and healthy housing via the following changes:

*Category 1: Regional Plans for Sustainable Development.* Funds would support stakeholder-driven visioning and scenario planning exercises that will address and harmonize plans for the location, scale, ~~and~~ type, affordability, and condition of housing; education and job centers; . . . . Funding in this category would support data analysis, urban design and outreach efforts to achieve broad consensus among groups, citizens, and decision-makers for a single vision/scenario . . . which would include consideration of needs identified in a Health Impact Assessment and compatibility with an applicable Consolidated Plan.

*Category 2: Detailed Execution Plans and Programs . . . .* [T]he funds from this category would likely support a wide range of implementation activities . . . . For example, inter-jurisdictional affordable and fair housing strategies, efforts to ensure the health and safety of residential properties, especially affordable housing, regional transportation investment programs . . . .

*Category 3: Implementation Incentives. . . .* [T]his category would support pre-development costs, capital costs for a regionally significant development and ~~or~~ infrastructure investment, including investment in improving housing conditions, or land acquisition investments. . . .

**Citizen Participation:** For all three categories, we encourage you to require – or at least affirmatively invite – participation from experts in health and housing, particularly:

- housing stakeholders and intermediaries, including community-based organizations, community development corporations, advocates for healthy housing and lead poisoning prevention and low-income housing coalitions, and
- the local, county and state agencies responsible for administering housing, public health and/or environmental health codes.

**Performance Metrics:** For all three categories, we encourage you to include in the required performance metrics “health indicators,” such as those developed by the San Francisco Department of Public Health’s *Healthy Development Measurement Tool* (see: [www.theHDMT.org](http://www.theHDMT.org)).

## **B. Entities Eligible for Funding**

In this section, HUD stated that it “is considering as an eligible entity a multi-jurisdictional and multi-sector partnership consisting of a consortium of units of general local government and all government, civic, philanthropic and business entities with a responsibility for implementing a Regional Plan” and asked if specific entities should be required partners. Per our recommendation above, we feel that it is critical that public health officials and organizations with expertise in healthy housing be invited to participate.

## **C. Selection Criteria**

In this section, we encourage you to continue to signal the importance of public health via the following changes:

In evaluating an application for a grant, HUD...will evaluate whether the application furthers the creation of livable communities by advancing regional planning that integrates housing, transportation, public health and environmental decisions...

In addition, per the above recommendations, in evaluating applications we urge you to consider giving higher ranking to proposals that include 1) Use of Health Impact Assessments; and 2) Partnership with state and local healthy housing and public health organizations.

If you have questions or need additional information, please contact me at 443-539-4159 or [rmorley@nchh.org](mailto:rmorley@nchh.org).

Sincerely,

Rebecca Morley  
Coalition Chair and  
Exec. Dir., Natl. Ctr. For Healthy Housing

Meri-K Appy  
Executive Director  
Home Safety Council

Sara C. Yerkes  
Senior Vice President, Government Relations  
International Code Council

Stacey Chacker  
Director of Environmental Health and  
Asthma Regional Council  
Health Resources in Action, Inc.

Georges C. Benjamin, MD, FACP, FACEP  
(Emeritus)  
Executive Director  
American Public Health Association

Sheila Crowley  
President and CEO  
National Low Income Housing Coalition

Ken Wade  
Chief Executive Officer  
NeighborWorks America

Carl Grimes  
President  
Indoor Air Quality Association

Attachments: National Safe and Healthy Housing Coalition Member List



## National Safe and Healthy Housing Coalition

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### Member List

Alameda County Lead Poisoning Prev Program  
American Public Health Association\*  
American Society of Home Inspectors\*  
Assn. of State and Territorial Health Officials\*  
Asthma Regional Council of New England  
Children's Environmental Health Network  
Children's Health Forum\*  
City of Baltimore  
City of Houston  
CLEAR Corps USA  
Coalition to End Childhood Lead Poisoning  
Common Health Action  
Council of Large Public Housing Authorities  
Energy Programs Consortium  
Enterprise Community Partners\*  
Healthy Homes Grantees Association  
Healthy Homes for Kalamazoo Coalition  
Healthy Housing Solutions, Inc.  
Home Safety Council\*  
IDeA Center, University at Buffalo  
Indoor Air Quality Association  
International Code Council  
Isles, Inc.  
Living Cities  
National Affordable Housing Managers Association  
National Assembly on School-Based Healthcare  
National Association of Realtors®\*  
National Assc of Housing & Redeve Officials  
National Center for Healthy Housing\*  
National Env Education Training Foundation  
National Environmental Health Association  
National Low Income Housing Coalition\*  
National Organization for Local Boards of Health  
NeighborWorks America\*  
Omaha Healthy Kids Alliance  
People's Place  
PEW Charitable Trusts  
Poverty and Race Research Action Council  
Rand Corporation  
Rebuilding Together\*  
RWJF Commission to Build a Healthier America\*  
Sustainable Community Development Group\*  
Sustainable Resources Center, Inc.  
U.S. Green Building Council\*  
WE ACT for Environmental Justice

**\*Provisional Steering Committee Member**