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by

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**Evaluating the Partnership for Sustainable Communities as a Federal
Shift Towards Integrated Transportation and Land Use Planning**

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by

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Report

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*“The history of America has been the story of Americans seizing, using, squandering,
and belatedly protecting their natural heritage.”*

– *John F. Kennedy, 1963*

*“It's time to throw out old policies that encouraged sprawl and congestion, pollution,
and ended up isolating our communities in the process. We need strategies that
encourage smart development linked to quality public transportation, that bring our
communities together.”*

– *Barack Obama, January 21, 2010
to the U.S. Conference of Mayors*

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The University of Texas at Austin, 2010

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This report explores how, why, and to what ends the Partnership for Sustainable Development is attempting to integrate land use and transportation planning in the United States. Analysis of the Partnership's organization and operation reveals that while the Partnership Agreement suggests that the goal is policy integration, the vague objectives in the agreement and weak linkages displayed between the Partnership members--the Department of Housing and Urban Development, Department of Transportation, and Environmental Protection Agency--are indicative of basic policy coordination. Historical and cultural characteristics of the departments are partly responsible for the gap between the goals and the rhetoric. To understand how integrated planning works the report examines the Chicago Metropolitan Planning Agency's current planning efforts and best practices from the European Union, where integrated planning has occurred for almost 20 years. The report ends with recommendations for the Partnership about how to learn from the experiences of the Chicago Metropolitan Planning Agency and the European Union.

Table of Contents

1	Introduction: Sustainable Communities.....	1
2	Sustainability at the Chicago Metropolitan Agency for Planning.....	22
3	Comparative Analysis: Sustainable Planning Initiatives in the European Union.....	40
4	Recommendations for the Partnership for Sustainable Communities.....	48
	<i>Bibliography</i>	55
	<i>Vita</i>	59

List of Tables and Figures

Figures

1.1	Range of Approaches to Sustainability.....	3
2.1	CMAP Board Composition.....	33
2.2	CMAP Organizational Structure.....	35

Tables

1.1	Analytic Framework Applied to the Status Quo.....	6
1.2	Analytic Framework Applied to the Partnership for Sustainable Communities....	11
2.1	Principles, Indicators, and Units for Sustainability Performance Measurement...25	

Introduction: Sustainable Communities

This chapter explores how and why the federal Departments of Housing and Urban Development (HUD) and Transportation (DOT) came together with the Environmental Protection Agency (EPA) in June 2009 to create a formal partnership in the name of sustainability. First I explore the various interpretations of “sustainability” as an environmental management and policy goal. This leads into an analysis of the purpose, structure, and objectives of the Partnership for Sustainable Communities. To understand why this collaboration is unprecedented from a policy-making perspective, I compare this partnership to previous HUD-DOT collaborations. From a management perspective, I analyze the partnership agreement and proposed actions to understand whether or not the partnership displays qualities that have proven to be significant determinants of effective cross-sectoral collaboration in the federal government.

To understand some of the economic and legal challenges facing the Partnership for Sustainable Communities, the next chapter presents a case study of a current planning initiative that is a model for the HUD-DOT-EPA collaboration. Chapter 3 examines integrated planning initiatives in the European Union as a basis for comparing the Partnership for Sustainable Communities in the context of a complex, tiered governance structure. In the final chapter, I put forth a set of recommendations for the Partnership for

Sustainable Communities.

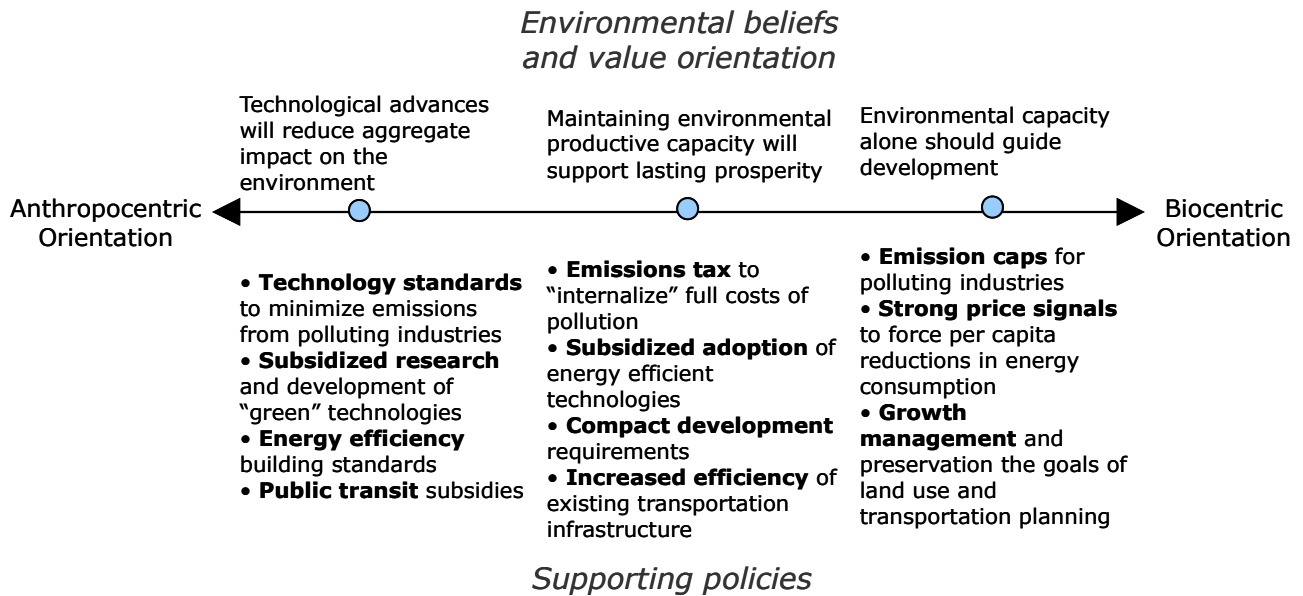
Sustainability in Context

In 1999, Lamont Hempel, then the Director of Environmental Programs at the University of Redlands, wrote that sustainability had “successfully invaded the rhetoric, if not the substance, of policy debate” (in Mazmanian and Kraft, 59). With President Clinton's Council on Sustainable Development, “sustainability” was well on its way to becoming a motivating, yet strategically ambiguous concept. Because of the term's ambiguity, it could garner the wide support of other public welfare notions such as “efficiency” and “equity.” More than ten years later, sustainability remains the nebulous concept that is the benchmark for environmental stewardship. On October 5, 2009, President Obama signed an executive order mandating the development and implementation of Strategic Sustainability Performance Plans for all federal agencies. The title of the executive order, “Federal Leadership in Environmental, Energy, and Economic Performance,” and the directive to “prioritize actions based on a full accounting of both economic and social benefits and costs” reinforce that the definition of sustainability Obama is adhering to is the one set out in the National Environmental Policy Act (NEPA) of 1969. In NEPA, achieving sustainability requires meeting the “social, economic, and other requirements of present and future generations of Americans” (Section 101[a]). Sustainability, as understood from NEPA, requires achieving social, economic, and ecological integrity without compromising the ability of

future generations to do the same.

Defining sustainability as primarily satisfying human needs now and in the future is not a universally accepted definition. There is a range of perspectives on sustainability, and those perspectives come from different ways of valuing and understanding the limits of environmental resources (Baker et al., 1997, 9). As seen in Figure 1.1, anthropogenic approaches to sustainability do not see environmental capacity as a strict limit to development; technological innovations will “stretch” environmental constraints, allowing development to continue with minimal change in consumption patterns. Policies that follow this line of reasoning include those that support businesses and households in making incremental behavioral changes that aggregate to create a “green” marketplace.

Figure 1.1 *Range of Approaches to Sustainability (Adapted from Baker et al, 1997, 9)*



On the other side of the spectrum, a biocentric orientation holds that environmental capacity should dictate the limits on development. An important difference

to note about the policies of a biocentric approach to sustainability is that these policies require more comprehensive, top-down implementation strategies than do the anthropogenic-oriented strategies. This suggests that a national government with a more biocentric orientation is likely favor centralized environmental management. The common assumption throughout the spectrum is that for growth to continue, we must achieve ecological equilibrium.

Some of the rhetoric from the Obama administration to date follows a biocentric approach to sustainability, but the majority of the actions of his administration show the administration's dominant anthropocentric orientation. This is especially apparent when comparing federal actions to what steps many states, regions, and municipalities have already taken. In HUD's description of Sustainable Communities in its FY2011 budget, there is a note that “the number of Mayors that have signed the Climate Protection goals is significantly more” than the program could hope to support through grants (“Overview of New and Cross-Cutting Initiatives,” 2010, G-1), which suggests that the program is trying to catch up with the local demand for comprehensive environmental management. Deeper analysis will show whether the Partnership for Sustainable Communities is primarily a rhetorical nod to an existing trend, or if it represents a significant shift towards a unified approach throughout the country. If it does represent a shift, it could either be in terms of what has been the government’s dominantly anthropocentric orientation, or in the different terms of a more biocentric orientation.

Analytic Framework

Two central conceptualizations shape the analytic framework I use to assess the current federal approach toward sustainability. One conception is of the appropriate role of the national government in environmental management and policy making with respect to sub-national levels of government. In the United States, the federal government has extended its regulatory powers in certain areas of environment management, such as water and air quality, while leaving other areas almost entirely to the discretion of states and regional bodies. With its national environmental regulations, the government has taken a piecemeal approach with varying levels of specificity and implementation, calling its institutional competency as an environmental regulator into question (Mazmanian and Kraft, 1999, xi).

While some argue for the necessity of coordination on a federal or international level due to the global scale of environmental externalities, e.g., global warming (Weiner, 2007), many scholars and practitioners have called for environmental management by local and regional bodies. They cite the many examples of innovative community- and regional-based environmental programs and the high agency costs associated with federal bureaucracy (Baker and Gillette, 2004, 6-8; Engle and Saleska, 2005; Hempel in Mazmanian and Kraft, 1999, 67). Rawlins and Paterson (2010) argue that there needs to be legal accountability in order for local and state initiatives to amount to the type of change needed to achieve sustainability, which is why federal standards that can hold up in court are necessary.

The other conceptualization is the challenge presented by issues of governance and institutional design. Since the Partnership for Sustainable Communities is a collaboration of agencies with distinct purposes and goals, the “silo” effect is particularly relevant. The silo effect occurs when an agency makes decisions that further its own goals, but without regard to the goals of other agencies or the government in general. The history of transportation infrastructure planning in the U.S. is a classic case of the silo effect, since post-World War II federal and state DOTs were notorious for plowing interstate highways through urban cores to advance their agencies' mobility goals at the expense of economic, social and ecological sustainability (Horan et al. in Mazmanian and Kraft, 1999, ch. 7).

Table 1.1 *Analytic Framework Applied to the Status Quo*

	Coordinated Decision Making	Fragmented Decision Making
National government	EPA’s environmental quality standards and enforcement	Funding priorities for housing, transportation, energy, and related projects
Sub-national government	State/regional/local environmental quality standards and enforcement	Transportation and land use planning

Partnership Purpose, Structure, and Objectives

In March 2009, the Secretary of HUD testified before Congress that the purpose of integrating housing, transportation and land use planning is three-fold: lowering housing and transportation costs; improving access and mobility; and reducing energy

consumption and green house gasses. The Secretary spent the majority of his time detailing the relationship between housing and transportation costs, which was particularly relevant given the unfolding mortgage crisis. Reducing green house gasses was mainly a byproduct of people having better access to transit resulting from coordinated strategies such as transit-oriented development. The Secretary also announced an upcoming HUD-DOT program that would pursue coordinated planning, called the Sustainable Communities Initiative (“Livable Communities,” 2009).

The Secretary's remarks made clear that a HUD-DOT collaboration could address the economic aspect of sustainability, but there was little reason to believe that the collaboration would significantly improve environmental quality. When the Partnership for Sustainable Communities was formally announced several months later, the partnership had grown to include the EPA. The authors of the partnership agreement released on June 16, 2009 explain that EPA joined the partnership in order “to ensure that these housing and transportation goals are met while simultaneously protecting the environment, promoting equitable development, and helping to address the challenges of climate change” (HUD, DOT and EPA Partnership, 2009).

The goals detailed in the partnership agreement did not shift significantly from those that HUD's Secretary Donovan outlined in March 2009. Again, the only explicit reference to environment quality goals relates to the reduction of green house gasses due to increased transportation options. According to the partnership agreement, the main contribution of the EPA to this program program will be through efforts to return

“underutilized” sites to “productive” use, as well as through commitments such as “aligning” HUD, DOT, and EPA programs and undertaking “joint research, data collection and outreach” (“HUD, DOT and EPA Partnership,” 2009).

Resulting from the partnership agreement, the agencies have created an interagency taskforce. The leaders of the taskforce are the Senior Advisor to HUD's Deputy Secretary, DOT's Deputy Assistant Secretary for Transportation Policy, and EPA's Director for the Development, Community, and Environment Division. This taskforce is responsible for creating grant incentives for state, regional, and local integrated planning, called the Sustainable Communities Initiative. Grant funding will be part of HUD's budget and administered by HUD's Office of Sustainable Development in collaboration with DOT and the EPA (“Affordable Housing in Transit-Oriented Development,” 2009, 36).

Obama's October 5th executive order, “Federal Leadership in Environmental, Energy, and Economic Performance,” provides more information about how the HUD-DOT-EPA partnership will interact with other levels of government. According to the order's policy description, the federal government will lead by example. One of the responsibilities of an agency implementing its Strategic Sustainability Performance Plan is to interact with regional and local counterparts. Section 2(f) of the order requires agencies to “advance regional and local integrated planning.” Among the various tactics for this advancement are participating in transportation planning efforts, coordinating with regional programs for watershed, ecosystem, and environmental management, and

choosing pedestrian- and transit-accessible sites in central business districts for new federal facilities. As with other federal sustainability policies, there is no indication that any aspect of the Strategic Sustainability Performance Plans will be enforceable by law.

The Partnership, as portrayed in the executive order, is also a resource for integrated research. Section 10 of the executive order specifically assigns DOT, in coordination with the Partnership for Sustainable Communities, to the task of reviewing existing policies on locating federal facilities. The order gives DOT six months to complete the analysis and to develop recommendations for more sustainable strategies, which means that the recommendations should be completed early April 2010.

Besides the task of analyzing and creating a strategy for federal facility siting, since the creation of the Partnership, HUD, DOT and EPA administrators have traveled around the country learning about integrated planning already taking place. On June 23, 2009, the EPA issued a press release stating that Administrator Lisa Jackson was in Denver, Colorado visiting a compact, mixed-use development with energy efficient homes. During the visit Administrator Jackson highlighted the Partnership for Sustainable Development as a platform from which the government can promote similar planning strategies throughout the country (“EPA Administrator,” 2009).

Not quite three months after Administrator Jackson's visit, she returned to Denver with the Secretaries of HUD and DOT and White House Director of Urban Affairs. This was the last stop on the official Sustainable Communities Tour (the other two cities on the tour were Chicago and Dubuque). The Denver sites the group visited were a regional



light-rail transit hub and a transit-oriented development (TOD) built on a former brownfield, which is a site contaminated due to industrial use. During the visit, HUD Secretary Donovan announced that this TOD was one of thirty-six projects slated to receive a portion of the \$300 million in Recovery Act Public Housing Capital Funds, a program to retrofit or build public housing with high energy efficiency. He added that HUD had just revised its guidelines to allow for public housing development in urban core areas previously regarded as unsuitable for multifamily housing (“Administration Officials Wrap Up,” 2009).

EPA Administrator Jackson took the opportunity to announce a new online tool for municipalities to revise zoning codes and land use ordinances in order “to improve access to affordable housing, provide additional low-cost transportation options, preserve community character, and protect the local environment.” In addition, EPA would pay for teams of experts to provide technical assistance to select municipalities embarking on sustainability initiatives. According to the press release, DOT Secretary LaHood had nothing groundbreaking to announce (“Administration Officials Wrap Up,” 2009).

As with all other sources of information about the Partnership, details about its structure and joint activities were lacking. Again there was a mention of coordinating strategies of the three agencies to align their programs and work together effectively. The only new information about the inner-workings of the Partnership was that it is closely tied to the White House Domestic Policy Council (“Administration Officials Wrap Up,” 2009). Currently, the strategy alignment between the three agencies is loose, as

evidenced by the separate, unconnected announcements of assistance and guideline changes.

Table 1.2 *Analytic Framework Applied to the Partnership for Sustainable Communities*

	Coordinated Decision Making		Fragmented Decision Making
National government	EPA’s environmental quality standards and enforcement		Funding priorities for housing, transportation, energy, and related projects
Sub-national government	State/regional/local environmental quality standards and enforcement		Transportation and land use planning

 *Role of Partnership for Sustainability*

Previous Linkages between HUD and DOT

As described in a joint HUD-DOT report to Congress, the first time the two agencies considered collaborating was during a 2003 roundtable hosted by the National Academy of Sciences. The motivation for proposing their collaboration was to strengthen transportation-oriented development (TOD) strategies, which required compatible housing and transportation data. HUD and the Federal Transit Administration (FTA), a division of DOT, entered into an interagency agreement (IAA) in 2005 with the goal of meeting demand for housing near transit. The product of the IAA was a study published in 2007, which mapped areas well-suited for TOD in several cities and proposed strategies for TOD for state, regional, and local governments. The study also included ideas for better coordinating HUD and FTA programs (“Better Coordination,” 2008, 5).

The most pressing motivation for the HUD-FTA proposals to coordinate was a directive that the House-Senate Conference Committee issued in conjunction with the Fiscal Year (FY) 2008 Consolidated Appropriations Act. HUD spends billions each year on constructing and subsidizing low-income housing through many programs, none of which give preference to housing located in proximity to transit. FTA spends billions of dollars building and refurbishing transit, but does not help low-income housing providers capture the added value of transit amenities; instead, the housing near new transit facilities is generally market rate condominiums. Stating that “the Committee strongly believes that transportation, housing, and energy can no longer be viewed as completely separate spheres with little or no coordination throughout the different levels of government,” the Congressional directive ordered FTA and HUD to create TOD guidelines for municipalities and to submit a report within six months about coordinating efforts to create more affordable housing near transit (Pub. L. 110-161).

The resulting HUD-FTA report cites some clever ways municipalities and transit authorities have found to encourage TOD using separate federal funding streams, and acknowledges that despite the multiplicity of local strategies, there is a growing unmet need for affordable housing in the TOD housing mix. Most of the eleven proposals for better coordination between HUD and FTA foreshadow the Partnership for Sustainability partnership agreement: convening a working group to coordinate legislative, research, and regulatory activities; developing best practice manuals; creating financial incentives; identifying joint outreach opportunities; and finding mechanisms to integrate HUD and

DOT planning requirements. The last recommendation of coordinating planning requirements specifically called for exploring how Metropolitan Planning Organizations (MPOs) or regional councils of governments (COGs) could collaborate with local transit and housing authorities (“Better Coordination,” 2008, 7-10).

MPOs and COGs are particularly suitable platforms for starting the process of transportation and land use planning integration. Despite their varied structure, size, state mandates, and technical capacity, MPOs have relatively recently a great deal of influence in regional transportation policy. Though MPOs were created in the early 1960s, they only gained significant power under the 1991 Intermodal Surface Transportation Efficiency Act (ISTEA)--one of the first pieces of legislation to provide significant amounts of federal transportation dollars for quality-of-life transportation enhancements. Under ISTEA and subsequent transportation legislation, MPOs are responsible for prioritizing transportation projects for federal funding in metropolitan regions with over 50,000 residents. The rationale for assigning this task to MPOs rather than state DOTs is that MPOs are thought to be better able to align transportation projects with environmental regulations (most critically, EPA's air quality attainment standards) and plans for regional growth (Horan et al in Mazmanian and Kraft, 1999, 222-223; U.S. GAO, 2009).

COGs preceded MPOs as federally-empowered regional decision-making bodies. In 1959 the federal government, supported by the League of Cities and National Association of Counties, granted COGs the ability to engage in limited planning activities

and screen federal funding applications from municipalities within its jurisdiction. This discretionary power lasted until 1983. Some COGs have merged with MPOs, yet others remain distinct bodies (Mitchell-Weaver et al., 2000).

In their study of growing MPO influence in regional land use planning, Oden and Woods have identified four principal methods by which MPOs or combined MPO-COGs are able to integrate land use planning into their federally- (and sometimes state-) mandated transportation planning roles: “forecasting and long range planning; selection of projects that may influence land use; direct incentives to jurisdictions to change land use policies; and ranking projects in the planning process according to changes in land use policies by the proposing jurisdiction.” In a nationwide survey of MPOs, Woods found that 92.8 percent were “concerned” with land use—57.7 percent signifying that it was an “important focus.” Almost 60 percent claimed that the MPO considered land use much more seriously than it had ten years previously. Of the MPOs that considered land use an important focus, a little over 70 percent were combined COG-MPOs. But when it came to land use or transportation demand management strategies, only a few of the MPOs reported implementing any (2007, 17-28).

This lack of action despite overwhelming interest suggests that there is motivation but few tools, or little capacity, for integrative planning initiatives on the regional scale. Oden and Woods suggest that there are significant political and market-driven barriers to comprehensive planning at the regional level; localities are able to opt out of their MPO membership (though doing so requires foregoing all federal transportation dollars), and

home builders and other real estate interests have been successful at lobbying against MPO control of land use decisions (2007). The proposals from the joint HUD-FTA report to Congress in 2008 would start to address the issue of technical capacity and financial incentives for MPOs to become involved in affordable housing provision, but there are no proposals that address the political preference for local control or lobbying by powerful interest groups. Despite the appeal of MPOs as regional planning bodies, the most crucial land use planning decision making power lies at the local level, over which only states have regulatory powers.

The historical (and current) lack of coordination between DOT and HUD or their local, regional, and state counterparts may be due to cultural and structural differences. Congress established DOT in 1966, when the federal government was busy building an interstate highway system as a matter of national defense. According to the DOT's Office of the Historian, the creation of the DOT required the greatest reorganization of the federal government since the 1947 National Security Act. It was a new cabinet-level department that encompassed over thirty transportation agencies and 95,000 employees, mostly from the Coast Guard, Federal Aviation Agency, and the Bureau of Public Records, making DOT the fourth largest federal agency at the time. A particular point of interest here is that President Johnson forced HUD to relinquish its urban transit authority to DOT, which became effective in 1968 as the Urban Mass Transit Administration. (ISTEA changed the Urban Mass Transit Administration into the FTA.) The transfer of power occurred after Johnson requested that HUD make its own proposals for how to

logically divide control of mass transit, but HUD's response “failed to resolve the issue” (“A Brief History”).

HUD predates DOT by only one year. Rather than inheriting other agencies' legacies of national defense and bureaucracy, as DOT had, HUD was a part of President Johnson's civil rights policy agenda. The new agency did not have to incorporate and balance diverse powers and interests, but was a reincarnation of the Housing and Home Finance Agency (HHFA). The HHFA encompassed the Federal Housing Authority, created by 1937 Housing Act to distribute funding to local public housing agencies (LHAs); the Public Housing Administration; and the Federal Home Loan Bank Administration (“HUD Historical Background,” 2007).

The federal government believed that housing and urban development was deeply entwined with race politics in the 1960s. The choice of secretaries somewhat speaks to this: the first HUD secretary was also the first African American cabinet member, and the sixth HUD secretary was the first African-American woman to serve in the cabinet. During the mid-1960s there were a number of inner-city riots and widely perceived urban decline with “white flight” and the rise of suburbs. The 1968 Fair Housing Act (also known as the Civil Rights Act), which prohibited housing discrimination based on race, color, religion, or national origin, was thought to be one of HUD's strongest legislative mandates to stabilize inner-city communities. The act also created the Government National Mortgage Agency (Ginnie Mae), aimed at allowing moderate income families to purchase homes. In 1970, HUD received power from the Housing and Urban

Development Act to implement the Federal Experimental Housing Allowance Program as well as Community Development Corporations (“HUD Historical Background,” 2007; Vale, 2000).

The cultural divide between DOT and HUD due in large part to their historical origins is visible even in the two agencies' missions. DOT's mission is to “[s]erve the United States by ensuring a fast, safe, efficient, accessible and convenient transportation system” (“About DOT”), while HUD's mission is “to increase homeownership, support community development and increase access to affordable housing free from discrimination” (“Mission”). DOT's mission can be accomplished top-down by a team of engineers, whereas HUD's mission implies a bottom-up strategy of local community involvement.

Looking at recent DOT and HUD actions, their distinct cultures appear to have influenced their distinct approaches to the Partnership. Both approaches fall on the anthropocentric end of the spectrum outlined in Figure 1.1 by using technical solutions to minimize environmental impact rather than making decisions that reflect ecological carrying capacities. HUD has chosen to inform the development of its part of the Partnership for Sustainable Communities by conducting a series of “Listening Sessions” throughout the country and online to hear what local, regional, and state stakeholders would like to see in the program (“Sustainable Communities Programs April 2010”). DOT has simply reshuffled its “Livability” program in the FTA to be the “Livable and Sustainable Communities” program, which is the same content as before but with a new

tone of collaboration with HUD and the EPA (“Livable and Sustainable Communities”).

Effective Cross-Sectoral Collaboration

In a September 2009 report, “Strategies for Building Results-Oriented and Collaborative Culture in the Federal Government,” the Government Accountability Office (GAO) described certain management practices and leadership behavior that enhance performance of federal agencies and programs. The best management practices include (2):

- | | |
|---|--|
| <ul style="list-style-type: none">• demonstrating leadership commitment,• communicating the importance of using performance information frequently and effectively,• creating a clear “line of sight” | <ul style="list-style-type: none">linking individual performance with organizational results,• improving the usefulness of performance information, and• developing the capacity to collect and use performance information. |
|---|--|

There is little doubt that the Partnership for Sustainable Communities has demonstrated leadership commitment. The HUD and DOT Secretaries and EPA Administrator have made frequent public appearances together touting the interagency initiative. But because there are no clear outputs from the Partnership—only vague ideas about aligning goals and joint research—there has been little discussion of performance information for measuring the Partnership's effectiveness.

Performance measures tend to appear in budget justification documents, and HUD's FY2011 budget outlines four measurable objectives: offer Sustainable Communities Planning Grants jointly with DOT and the EPA; fund “challenge grants” to

help communities implement Sustainable Community Plans; create a “capacity-building program and tools clearinghouse” for communities attempting to create a Sustainable Community Plan or just become more sustainable; and joint HUD-DOT-EPA research to “advance transportation and housing linkages on a number of levels.” HUD's requested budget for all of this is \$150 million, the same budget it had in FY2010 (“Overview of New and Cross-Cutting Initiatives,” 2010, 1).

DOT's budget request for Partnership for Sustainable Communities is quite a bit more: \$527 million. Over \$300 million of that funding would go to transit projects that expand low-income households' access to transit. Together with HUD and the EPA, DOT would help transit agencies access existing DOT formula grants, such as the Job Access and Reverse Commute formula grants and grants available to states and MPOs for quality-of-life transportation projects. Another \$200 million is part of a competitive “livability” grant program, the funds from which would be taken from designated highway funds. The grant could be used to build integrative planning capacity or implementing and assessing livability project. The final \$20 million would establish a new office within DOT—Office of Livable Communities—that would be responsible for coordinating with HUD and the EPA (“FY2011 Budget Highlights,” 3-4).

It is confusing why DOT insists on calling its program “Livable Communities” while both HUD and the EPA are using “Sustainable Communities” as the title for their joint and individual programs. HUD has already created an Office of Sustainable Housing and Communities, and the EPA has made its participation in the Partnership for

Sustainable Communities a centerpiece of its Smart Growth program. For FY 2011, the EPA increased its budget request to \$10.9 million up from its \$5.7 million allocation in FY 2010. The specific purposes of the EPA's budget request is less concrete than both DOT and HUD; the budget explains that extra \$5.2 million would help the EPA to “more fully implement the Partnership for Sustainable Communities” with DOT and HUD. The remainder of the funding would go toward the capacity-building initiative that Administrator Jackson announced in Denver last September (“FY2011 EPA Budget in Brief,” 11).

The Partnership does not appear to be at the point of collectively determining performance measures. The agencies need to put together the research that will identify how to measure progress towards the desired outcome. Once the three agencies are able to build a “results-oriented and collaborative culture,” the next result to look for from the Partnership for Sustainable Communities will be integrated policy development and implementation. A variety of management and governance theories suggest that there are a variety of factors that typically support the success of inter-territorial integration, defined as “policy integration between neighboring authorities or authorities with some shared interest in infrastructure and/or resources” (Geerlings et al., 2003, 188). The factors include:

- political commitment,
- unified policy framework,
- capacity for central overview and coordination,

- responsive implementation strategies,
- and culture of cross-sectoral cooperation and systematic, inclusive dialog.

These factors are significant in drawing a distinction between policy *coordination* and policy *integration*. Coordination implies basic information sharing and dialog, whereas integration implies going beyond coordination to set joint policy goals that guide implementation strategies and create synergies (Geerlings et al., 2003, 188-189).

From the rhetoric of the Partnership for Sustainable Communities, their goal is certainly a degree of policy integration. Integrated transportation and land use planning requires just that. But, as evident in their partnership agreement, budgets, public statements, reports, and Congressional testimonies, the agencies seem prepared to only go as far as policy coordination. Coordination is certainly a step forward, but it is not enough to achieve “sustainability,” however defined, at state, regional, or local levels of government.

To understand what policy integration might look like, the next chapter turns to an integrated planning initiative that the Partnership for Sustainable Communities has designated as an example of success. I examine the details of the plan as well as the political process of creating a coalition for integrated planning. The purpose is to understand why this process is an example and what lessons we can learn from an early adopter of integrated planning.

Sustainability at the Chicago Metropolitan Agency for Planning

When the Secretary of Housing and Urban Development (HUD), Shaun Donovan, first announced the future collaboration of his agency with the Department of Transportation (DOT) during a testimony before Congress, he cited Chicago as one of the few places in the United States where integrated, regional land use and transportation planning was already well underway (Donovan and LaHood, 2009). This chapter explores the integrated planning process and the legal and political structure and context in which the Chicago metropolitan region has built its coalition for integrated planning. Comparing the Chicago region's experience to the goals and objectives of the Partnership for Sustainable Communities will reveal the challenges that remain to integrating transportation and land use planning and environmental management on the regional scale.

The Plan: *GO TO 2040*

GO TO 2040, the official title of Chicago Metropolitan Agency for Planning's (CMAP's) regional integrated plan, began with a regional visioning process in fall 2007. Through a series of public surveys and meetings, the regional visioning process arrived at

five guideposts for regional growth:

1. In 2040, the northeastern Illinois region will be a magnet attracting new, diverse residents, businesses, and investments from around the world. The region will be known for a high quality of life, based on its sustainable, equitable, innovative, and inclusive approaches to planning.
2. In 2040, decision making in northeastern Illinois will be informed by considerations of environmental health, energy use, and water supply.
3. In 2040, our region will have equitable and inclusive housing, and social systems that foster an educated, healthy, safe, and involved populace.
4. In 2040, the economy of northeastern Illinois will enjoy a global status that ensures superior job opportunities throughout the region for all socio-economic groups.
5. In 2040, governance systems in northeastern Illinois will feature a high degree of coordination and civic involvement (“Go to 2040 Regional Vision”).

Each of these statements touch upon factors that motivate the region's planning. As of 2008, the Chicago metro region was growing at the seventh fastest rate in the country, but the regional economy was in decline (“Census,” 2008). The first and fourth guideposts speak to the need to balance growth in population and appropriate economic opportunities.

As for the second guidepost, water supply planning is one of CMAP's most pressing natural resource concerns. Although Chicago sits on one of the largest freshwater sources in the world, the region's drinking water supply is reaching capacity. The U.S. Supreme Court recently issued a consent decree restricting Illinois's water rights in Lake Michigan, but the lake supplies more than three fourths of the region's drinking water. The rate at which water is extracted from aquifers already exceeds the recharge rate (Barner, 2008, 14).

The third and fifth guideposts both mention civic participation, equity in public

service delivery and housing—participation and equity being indicators of planning legitimacy—and coordination in governance. There is an overwhelming need for coordination among the multitude of county, municipal and other governmental units in the Chicago metro region. When a reporter spoke to the Village President of Sugar Grove, a small community in Kane County an hour west of the City of Chicago, about the creation of CMAP, the Village President responded: “We're somewhat suspicious of a governing body like that” (Tita, 2006, 16). Small communities with little chance for significant power in a regional governance structure believe themselves to be at risk of losing much of their control over local development decisions (see Figure 2.1, a map depicting where CMAP board members come from). Frank Beal, who leads a Chicago-based business organization aimed at developing and supporting regional growth solutions called Metropolis 2020, was quoted in the *Christian Scientist Monitor* neatly summing up the structural governance conflict:

Air quality and water quality and marketplaces and employment treat the region as an integrated whole, and yet the political reality is that there are 1,300 units of local government in metropolitan Chicago. The governance structure isn't adapted to the reality of what's here (Paulson, 2008, 3).

After the 2007 visioning process, CMAP started a “Regional Snapshot Series.” The series gathers and evaluates data on various issues that will contribute to achieving the regional vision and inform the planning process. So far, CMAP has completed “Snapshots” of state and local taxation, air quality, jobs-housing balance, industry clusters, the Latino population, infill and redevelopment, sustainability, and the aging population (“CMAP Regional Snapshot Series”).

The “Sustainability Snapshot” provides CMAP's take on what it means for the region to achieve sustainability and how progress toward that achievement should be measured. The report defines sustainability as meeting four principles and for each principle details the types of indicators that CMAP can measure to track its performance:

Table 2.1 *Principles, Indicators, and Units for Sustainability Performance Measurement (Adapted from CMAP, 2009)*

Principle	Indicators	Units
1. Environmental protection and long-term natural resource improvement	Ground surface hardening	Percent impervious by watershed
	Regional natural resource damage	Group of several indicators
	Habitat fragmentation	To be determined
	Greenhouse gas emissions	MMTCO ₂ e
	Environmental Footprint	Acres per person
	Petroleum consumption	Millions of gallons per year
	Air quality	To be determined
	Total energy use	Trillions of British Thermal Units
2. Prosperity and quality of life enhancement	Water use	Use/yield ratio; millions of gallons/day
	Total factor productivity (stratify by target industry)	Percent change from baseline
	Wage growth (stratify by target industry)	Percent change from baseline
	Employment growth (stratify by target industry)	Percent change from baseline
	Aggregate fiscal capacity	Equalized assessed value + taxable sales (\$)
	Trip length	Miles, minutes (work vs. all trips)
	Hours of delay	Hours per year
3. Human and constructed capital value preservation	Availability of transportation modes	Percent of total trips
	Roadway conditions	Miles by condition
	Bridge conditions	Number by condition
	Condition of transit assets	USDOT rating index
4. Equitable quality of life distribution	Education indicator	To be determined
	Fiscal disparity indicator	0 to 1 scale, no units
	Access to transit	Percent of total trips
	Access to jobs	Percent jobs within given commute distance

	Trip length	Miles, minutes
--	-------------	----------------

Several of these indicators could directly or indirectly benefit from integrated land use and transportation planning. Indicators in principles two and four, quality of life and equity, have the most direct connection; lowering commute time and increasing access to different modes of transportation depends on locating residential uses in proximity to employment opportunities and transit, bike, and pedestrian facilities.

Integrated planning can also help accomplish environmental goals in principle one, most directly by increasing density of development to minimize the region's "environmental footprint" and prevent habitat fragmentation. If residents are able to access transit and non-motorized forms of transportation, this should, in theory, decrease use of automobiles, which in turn decreases use of petroleum, decreases emissions of greenhouse gasses, and increases air quality.

Following the Snapshot Series CMAP prepared strategy papers, which are in essence policy recommendations for CMAP to implement through the final GO TO 2040 plan. Almost fifty strategy papers have been published so far, under the categories of transportation, housing, land use, environment, economic development, and human and community development.

Under the transportation category, the strategy paper that touches most significantly upon land use is the "Context Sensitivity Strategy Report." Context Sensitive Solutions (CSS) is a Federal Highway Administration (FHWA) initiative that gained momentum in the 1990s; FHWA defines CSS as a "collaborative,

interdisciplinary, approach that involves all stakeholders in developing a transportation facility that complements its physical setting and preserves scenic, aesthetic, and historic and environmental resources while maintaining safety and mobility.” One of FHWA's objectives is to make CSS part of transportation planning throughout the country (FHWA, 2008).

Illinois Department of Transportation (IDOT) has supplemented FHWA's definition by specifying that CSS is an approach to developing “multimodal” transportation systems that are not only context-appropriate, but cost-effective in construction, use, and maintenance. IDOT also emphasizes adding capacity by addressing unmet needs of a variety of transportation modes, including walking and biking, on existing streets rather than adding capacity by building new streets. In 2004 IDOT won FHWA's Award of Excellence in Urban Highways for its reconstruction of South Lake Shore Drive in Chicago that featured context-sensitive planning, which included public involvement that resulted in pedestrian underpasses and a drainage system that improved water quality in Lake Michigan (“Context Sensitive Strategy Report,” 2008, 7).

The housing strategy paper “Regulatory Barriers and Housing Affordability” focuses on building codes and land-use regulations that increase the cost of housing. Many of the ideas come from HUD's online Regulatory Barrier Clearing House. The paper recommends changing zoning codes to allow for a more diverse mix of housing stock by decreasing lot size requirements, allowing accessory apartments, providing affordable unit density bonuses, and encouraging mixed use development. In addition, the

paper suggests that municipalities should lower impact fees for affordable housing projects. Throughout the paper there is no mention of the combined cost of housing and transportation or transportation-oriented development (2009).

The strategy paper that most explicitly discusses the land-use-transportation connection is about school siting, under the land use category. Due to increasingly dispersed settlement patterns in the Chicago metro region, municipalities have been building schools further and further away from their historic cores. Meanwhile, many urban and inner-suburban schools have lost students. In Chicago proper, public school enrollment fell by 41,000 from 2001 to 2008. The paper cites the EPA's guideline of building schools to be community centers, which are more effective on centrally-located, small, densely developed sites. DOT's findings about the impact of schools on transportation conditions supports central location because of the associated reduced need for parking and traffic circles for drop offs. The impact of schools on transportation conditions is not restricted to the immediate area surrounding the schools; in the morning rush hours of six to nine, the Chicago Regional Travel Inventory found that up to 22 percent of traffic is school-related. The resulting congestion negatively affects the other 78 percent of drivers ("School Siting Strategy Paper," 2008, 4-8).

The solution is not as easy as encouraging students to walk to school. The rate of students walking to city schools is more than double the rate of students walking to suburban schools in the region. The reason for not walking is not just that the schools are too far away; students whose route to school is declared unsafe by IDOT also ride the

bus, regardless of how far away they live. The strategies CMAP identifies include selecting sites for schools to which at least half of the students will be able to walk and bike, and encouraging refurbishment of existing schools over building new schools (“School Siting Strategy Paper,” 2008, 8-12).

The strategy papers do not stand out for their original, out-of-the-box thinking. Rather, the papers gather best practices and data relevant to the region, borrowing heavily from DOT, HUD, and EPA publications and guidelines, and replicating the traditional division between land use and transportation strategies. What the strategy papers led to, a draft “Preferred Regional Scenario” that is now under consideration by CMAP for approval, is substantively more of the same. The policy direction for the quality of life vision theme is “strengthening existing communities, and to encourage new development that is denser and designed for mixed uses.” The transportation vision theme has a policy strategy that deals exclusively with gaining “operational efficiencies from existing infrastructure,” investing in transit and freight, and using “innovative finance and system management ideas” (2009, 3). Not even context-sensitive solutions are in the proposed policy direction, though this could very well change when CMAP comes out with the final GO TO 2040 Plan.

Even though the substance remains consistent, the rhetoric of the draft Preferred Regional Scenario swerves towards integrated planning. The final strategy in the scenario involves governance, and calls for sharing data, increasing transparency, and removing “artificial barriers” between local, regional, state, and federal programs (2009, 3). It

would not be surprising if removing barriers between programs is a reference to the then recently announced Partnership for Sustainable Communities, as this concept does not appear in earlier vision statements or strategy papers. As further proof, the authors of the draft scenario make a special point of announcing that the chapters are not divided according to past comprehensive plans:

Traditionally, comprehensive plans have chapters that separately cover transportation, housing, environment, and other topics. This report deliberately avoids that structure, linking inter-related issues that cannot be addressed effectively in “silos.” Instead, the policies and investments of the preferred Regional Scenario are divided into three main categories:

- Local infrastructure and the built environment
- Regional infrastructure and the built environment
- Non-physical infrastructure and the policy environment (2009, 6)

This is a rhetorical change from the strategy papers that fit neatly into traditional silos.

The reason for distinguishing between local and regional infrastructure is a political. Local infrastructure, the scenario affirms, is subject to local control. GO TO 2040 will not supersede local authority, but will facilitate coordination and cooperation between different levels of government (“Draft Preferred Regional Scenario,” 2009, 7). This is encouraging news for small-town leaders, like the village president quoted earlier in this chapter, who believed CMAP was usurping authority over their local development.

Under local infrastructure and the built environment, the scenario describes transit access as a component of affordable housing. Making the same argument as HUD Secretary Donovan in his testimony before Congress, transportation and housing costs should be considered as a package, and planning should create opportunities for low- and moderate- income families to find housing that allows them to minimize both types costs.

Another element of affordability the authors mention is home energy efficiency that will reduce utility bills (“Draft Preferred Regional Scenario,” 2009, 8), which was one of the EPA's contributions to the Partnership for Sustainable Communities.

With literary flourish, the authors of the Regional Scenario end the policy section on non-physical infrastructure and the policy environment with a warning: “The best-laid plans can go to waste without incentives for implementation at the regional and local level, where most of the decision-making authority exists for coordinated transportation, environment, and housing” (“Draft Preferred Regional Scenario,” 2009, 12). This could be a direct statement to the Partnership for Sustainable Communities. The message is that CMAP is creating a comprehensive, integrated regional plan, but without federal dollars funneled to regional and local government structures, implementation is uncertain.

Legal and Political Structure and Context of CMAP

One strong factor leading to the creation and political strength of CMAP has been the continued support of Chicago's regional business community. In 2008, approaching the 100th anniversary of Burnham's legendary Chicago city plan, an op-ed in *Crain's Chicago Business* magazine despaired the city's recent planning. “Our lack of planning has brought us to the brink of paralysis,” the writer declared. “Gridlock and Balkanization are making it too difficult to live and do business here.” The piece ended with an affirmation of CMAP as the city's only hope of living up to Burnham's legacy (“Today's City,” 2008, 18).

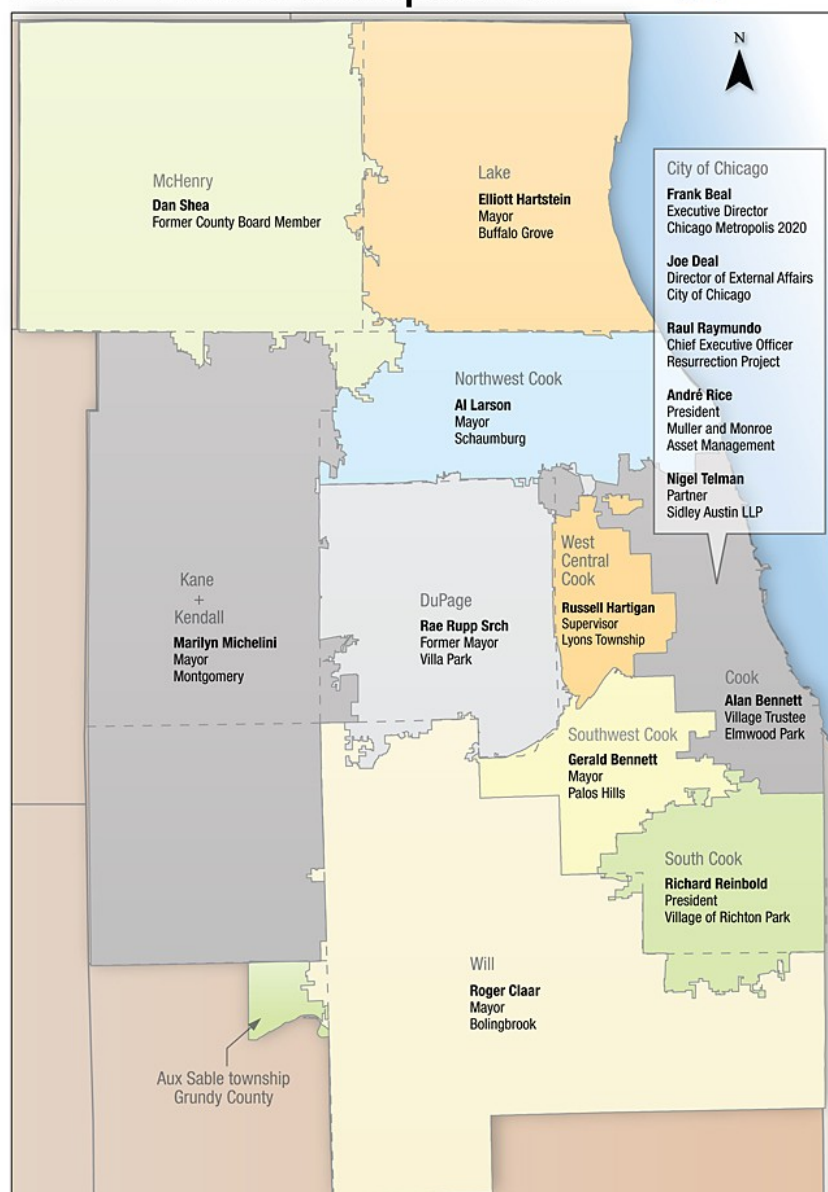
A couple years earlier, the same magazine provided an insider perspective on the creation of CMAP. Its article explains that Metropolis 2020, the business group mentioned earlier in this chapter, spearheaded the new agency. CMAP's direct predecessors were the Chicago Area Transportation Study (CATS) and the Northeastern Illinois Planning Commission (NIPC), neither of which had the power to implement policy (Tita, 2006, 16).

In 2005, successful lobbying of the Illinois state legislature resulting in the Regional Planning Act (Public Act 095-0677), which defined the powers of CMAP. The act designated CMAP as the unit of government responsible for resolving land use and transportation issues in the greater Chicago metro region. The act requires that the agency be governed by a Board of fifteen voting members; most of the member counties have one representative, though the counties with lower populations (Kane and Kendall) share a representative, the City of Chicago has five representatives, and Cook County, in which Chicago resides, gets an additional four members to represent areas outside the City of Chicago (Section 15). As evident in Figure 2.1, one of Chicago's current representatives is Frank Beal, the Executive Director of Metropolis 2020.

The Regional Planning Act gives CMAP the authority to create integrated land use and transportation plans for the region, but preserves local municipalities' ability to regulate local land use and zoning (Section 45). Despite the preservation of local control over land use and zoning decisions, there are more local decisions, such as building codes and infrastructure, which can determine development. The Regional Planning Act is

ambiguous as to whether municipalities will retain final authority on all traditionally local development decisions, which is why CMAP's “Draft Preferred Regional Scenario” makes the distinction between local and regional infrastructure.

Figure 2.1 *CMAP Board Composition*

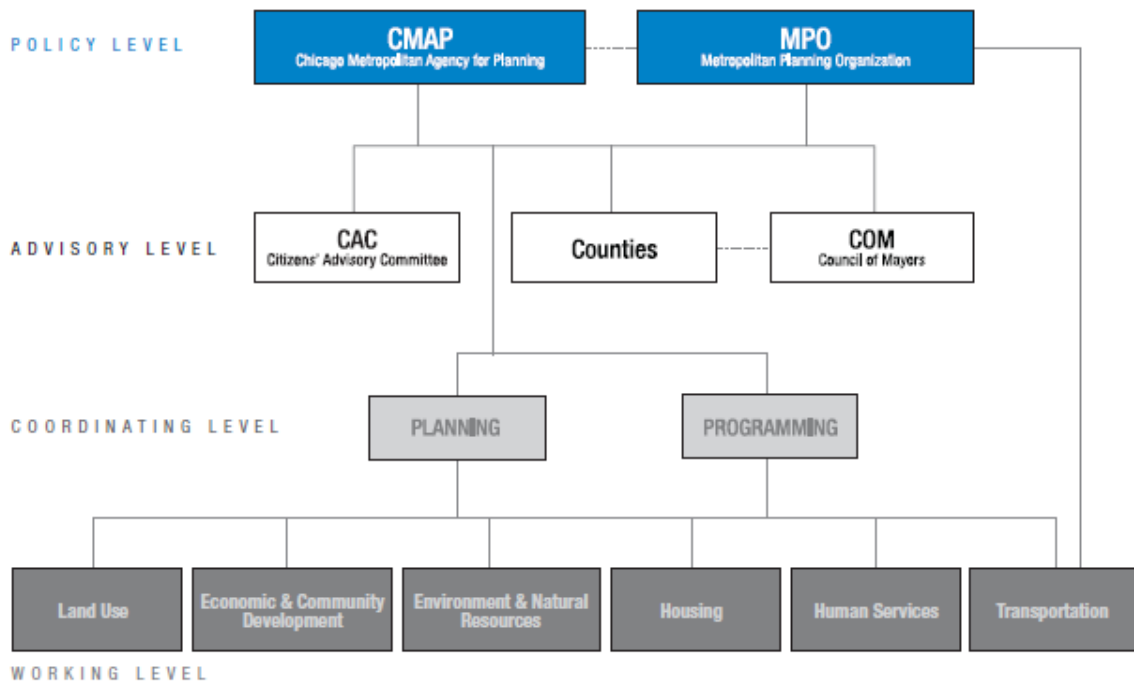


(http://www.cmap.illinois.gov/about/overview.aspx?ekmense1=c580fa7b_8_10_124_1)

There is specific language in the 2005 Regional Planning Act directing CMAP to create financial incentives for “creating more sustainable communities” using funds from federal, state, regional, and local sources (Section 48). To indicate the degree of freedom CMAP has under state law, one of its state-granted powers is that the agency may “exercise any other implied powers that are necessary or convenient for the Board to accomplish its purposes and that are not inconsistent with its expressed powers” (Section 35-9). This provides substantial protection for CMAP if its actions were ever to come under judicial review.

The control state law designates to CMAP over prioritizing transportation projects overlaps with the federal authority of the Metropolitan Planning Organization (MPO). The Regional Planning Act mandates that CMAP must give its approval before the MPO finalizes transportation decisions (Section 60(c)). Under the Act, CMAP also gains control over federal funding sources such as the Metropolitan Planning Program and Congestion Mitigation and Air Quality program funds (Section 62), which the MPO typically administers. Although CMAP's organizational chart depicts CMAP and MPO as equals on the policy level, the language in the 2005 Regional Planning Act suggests that CMAP does in fact have discretionary power over the MPO (see Figure 2.2).

Figure 2.2 *CMAP Organizational Structure*



<http://www.cmap.illinois.gov/uploadedFiles/committees/CmteStructure.pdf>

Passing the Regional Planning Act was not the first time the Illinois state legislature mandated integrated planning measures. In 2003 the legislature amended the Illinois Highway Code (PA 093-0545) requiring IDOT “embrace” context-sensitive design and solutions. Three years later, the state passed the Comprehensive Housing Planning Act (PA 94-965), which indicates the need for “a full range of quality housing choices” in proximity to job opportunities, transit services, and other amenities (Section 10-4). The law requires not just a regional, but a statewide annual housing plan (Section 15(a)).

The state legislature's awareness of crosscutting planning issues continues. Last May, the Illinois Senate and House adopted a joint resolution urging the state to create a

“green” capital improvement program that would prioritize increasing energy efficiency, limiting environmental impact of transportation and other built infrastructure, extending high-speed internet capability to underserved areas, and managing water resources (SJ 096-0036).

Political support for comprehensive planning is not hurting the ability of Illinois to attract federal grants. Recent federal funding awards show that Illinois and Chicago in particular are quite successful at attracting federal funds. On March 5, 2010, the Federal Transit Authority (FTA) announced that Illinois would receive over eleven million dollars in stimulus funds, the bulk of which went to rural transit facility improvements by IDOT (“Vice President Biden Announces”). The majority of Recovery Act Funding from HUD has been Neighborhood Stabilization grants, targeted at communities dealing with high rates for foreclosure. Of the two billion dollars in this funding, Illinois received just over 160 million dollars (“HUD Secretary Donovan Announces,” 2010).

The total Recovery Act funding for the Green Retrofit Program, which is the only HUD Recovery Act program closely aligned with environmental sustainability, is 300 million dollars. Of this total amount, the Chicago Housing Authority received 25.6 million dollars (This was one of the thirty-six “green” housing projects Secretary Donovan announced funding for during the Sustainable Communities tour last September, as discussed in the previous chapter) (“Secretary Donovan Announces,” 2009).

The EPA awarded Illinois about 257 million dollars out of the total six billion

dollars the agency had for its Recovery Act water infrastructure program (“EPA Announces Almost,” 2009). The state also received 550 thousand dollars from Recover Act funds to assess two brownfield sites, one in Chicago Heights and the other in Rock Island (“FY09 Brownfield Grants,” 2009). Compared to other cities and states around the countries, officials from Chicago and Illinois are good at figuring out what federal funding priorities are and showing that their programs are what the federal government wants to fund. There is little doubt that officials crafted the rhetoric of GO TO 2040 in part to attract federal dollars.

Current Challenges to Regional Integrated Planning

In the case of CMAP, which HUD Secretary Donovan referred to as an example for the Partnership for Sustainable Communities, there are challenges to fully integrating transportation and land use planning on a regional basis to achieve sustainability. One obvious reason is local protectionism, which is what caused CMAP to retreat somewhat from what it termed “local” infrastructure. The more serious challenge, though, is deeper than local recalcitrance. The strategy papers and draft preferred regional scenario that CMAP has produced cover housing, land use, transportation, and environmental quality. But the strategies approach each as mostly distinct areas, despite the inserted language about integration. CMAP appears to believe that just because its planning process covers the full range of issues, sustainable coordination must occur, even though the planning strategies for each remain separate. CMAP is certainly in the position to create an

integrated regional land use and transportation plan, but for now its planning strategy is more of a checklist. CMAP has a long way to go before it creates a plan that represents full integration.

In a September 2009 report, the Government Accountability Office (GAO) found that the DOT-HUD collaboration (starting in 2003 as a HUD-FTA interagency agreement) was not having a significant impact on local and state decision-making. For all of the promises of revised strategies and new incentives, the two agencies have failed to implement joint programs or meaningful incentives for coordination. It has been up to state and local authorities in favorable political climate to find creative ways of combining separate grants from the two agencies to fund projects that involve both land use and transportation, such as transportation-oriented development. The guidance that HUD and DOT each provide for integrated planning, according to the GAO report, is weak. The most damaging finding from the report was that the Partnership for Sustainability has no implementation plan for its own vision, which speaks to a profound lack of guidance for local, state, or regional counterparts (“Affordable Housing in Transit-Oriented Development”).

The GAO report acknowledged that the Partnership for Sustainable Communities is too new to write off completely. Nobody seems to be quite sure how implementation of fully integrated transportation and land use planning will look, since the practice has never been common in the United States. The next chapter examines integrated planning initiatives in the European Union that are further along in their development to provide

some basis for understanding how an integrated planning framework could work in a tiered, complex governance system.

Comparative Analysis: Sustainable Planning Initiatives in the European Union

This chapter describes how and to what ends European Union (EU) member nations are formulating, coordinating, and implementing national strategies for sustainable development (NSSD). Without going into the details of the EU's governance structure, the lessons that the Partnership for Sustainable Communities can take from the NSSD process are

- (1) the advantages of an iterative, participatory strategy for policy development over a top-down, command-and-control policy to achieve vertical integration of national and sub-national authorities;
- (2) the need to formulate strategies that are relevant to policy decisions and offer new flexible governance tools rather than idealized or overly prescriptive notions of the way things should be;
- (3) why policy integration requires integrating both political and administrative activities;
- (4) the impact of a high level of political commitment to and consensus on sustainability; and
- (5) how including non-state stakeholders can strengthen implementation of sustainable initiatives and contribute to higher quality performance evaluation.

Background

Attempts to integrate land use, transportation, and environmental decision making in the name of sustainability started in Europe during the 1980s, but gained traction in the 1990s. The 1997 Amsterdam Treaty, which amended the Treaty on European Union, describes integration as a vital step towards sustainable development in Article 6. The next year the European Councils met in Cardiff and began putting together strategies and indicators for integration, which continued during subsequent meetings in Helsinki in 1999, Gothenburg in 2000 (at which member countries were advised to start the NSSD process), and Barcelona in 2002 (Geerlings and Stead, 2003, 189-190). Article 1 of the 2001 European Strategic Environmental Assessment (SEA) Directive instructs member countries to integrate “environmental considerations into the preparation and adoption of plans and programs with a view to promoting more sustainable development.”

In the early 1990s, there was also an international push for changing the overall approach to environmental challenges. One of the most important international events was the United Nations Conference on Environment and Development's (UNCED's) 1992 Earth Summit in Rio de Janeiro. The capstone product of the summit, *Agenda 21*, led to the creation of the UN Commission on Sustainable Development, the Secretary-General's Inter-agency Committee on Sustainable Development, and the High-level Advisory Board on Sustainable Development. *Agenda 21* challenges governments to create an integrated approach to environment and development issues by harmonizing

economic, social, and environmental policies. Five years later, in Rio +5, the UN issued a 2002 deadline for completing these country plans (UNCED, 1997, 1-4).

The UN guidelines for a NSSD were that it should be data-driven, be long-term and not be limited to terms of office, fit well into the country's policy context, identify practical objectives, and, last but not least, integrate environmental, social, and economic policies. As for the process of creating the NSSD, national governments should be transparent, obtain wide participation, coordinate with sub-national levels of government, reflect self-assessment, be flexible, exhibit substantial political commitment, be guided by deadlines for realization, and be reflected in budget priorities (Steurer and Martinuzzi, 2005, 458).

Since these guidelines leave plenty of room for interpretation, the EU held a workshop “Sustainable Development in an Enlarged Union—Linking National Strategies and Strengthening European Coherence” in 2003 to coordinate the NSSDs of its member countries (Steurer and Martinuzzi, 2005, 456 f.n. 2). By comparing the various strategies that countries used to create NSSDs, a small body of literature has emerged describing best practices in the creation and implementation of an effective NSSD. What follows is a selection of those best practices in terms that relate back to the U.S. Partnership for Sustainable Communities.

Vertical Integration

Vertical integration, in the case of an NSSD, refers to coordination between

national and sub-national levels of government. This is crucial for the success of NSSD because, just as in the U.S., national policymakers are often not responsible for implementing the policies they develop. Vertical integration, though, is not only to ensure the proper implementation of sustainability policies. It is also part of the participatory process in which policymakers craft strategies; without input from those who will be directly responsible for getting results, national policymakers are at risk of creating strategies that will not be effective on the ground.

Many EU countries have not been able to achieve meaningful vertical integration. Of the exceptions, Switzerland has been one of the most innovative. At the beginning of the NSSD process, the country created a Sustainable Development Forum that includes representation of the national, regional, and large city governments. The motivation for the forum was to facilitate implementation of the country's NSSD on regional and local levels, but the forum evolved into a platform for regions and localities to share ideas, jointly implement sustainable development projects, and introduce new insight to the national sustainability agenda. The forum has close ties to associations of regional and local governments, which allowed for the dissemination of the forum's activities and even broader participation (Steurer and Martinuzzi, 2005, 462).

Another useful example is from Germany's land use planning policy. To ensure that each administrative level of decision making fully employs strategic environmental assessment (SEA), Germany uses a “counter current principle” that circumvents the conflicts that arise from bottom-up or top-down systems. This means that there are strict

requirements for decision-makers at each level to cooperate and coordinate with each other. At the national level officials create spatial frameworks and development objectives. State, regional, and county level officials create land use plans, while local officials, with direct public participation, create master plans. Landscape plans accompany all but the local plans and frameworks, which provide the SEA component. If there is reason to doubt the quality or consistency of a framework or plan, there are administrative review boards at various levels of government that are charged with monitoring and, if necessary, intervening (Fischer in Jones et al., 2005).

For the Partnership for Sustainable Communities, the most visible display of vertical integration has been the Sustainable Communities Tour. The tour, though, was about highlighting notable experiments in local and regional planning integration as well as an opportunity to announce new and revised federal initiatives. There was no sign that the tour was the beginning of a continuous dialogue or participatory process to better inform the Partnership's strategy formulation and enhance implementation.

Political and Administrative Integration

While horizontal policy integration in the NSSD process indicates the coordination of different agencies on a certain level of government, cross-horizontal policy integration is horizontal integration that extends to both administrative and political activities (Steurer and Martinuzzi, 2005, 460). In the U.S., the political side of policy formulation is, at least in theory, where representation becomes important.

Politicians, though, often represent certain interests over others, not always in the best interest of the public. Administrators are thought to be primarily concerned with the technicalities of rules and regulations and issues of compliance. The potential downside of a purely administrative perspective is that preoccupation with the particularities of rules and regulations can prevent administrators from a holistic understanding of a problem to find its underlying causes. Politics can provide the broad vision that administration lacks, and administration can help steer policy away from the self-interest of politics. These characterizations of the political and administrative sides of government are overly simplistic, but are meant to underscore why horizontal integration that only includes one or the other could be more vulnerable to certain weaknesses.

An example of cross-horizontal integration in the EU is from the United Kingdom, where the Department of Environment, Food, and Rural Affairs collaborated with the Finance Ministry to make sustainable development a budget priority. This meant that in order to secure funding, all departments had to file reports about how their policies advanced the sustainability principles set forth in the NSSD (Steurer and Martinuzzi, 2005, 463).

President Obama's October 2009 executive order mandating each federal agency produce a Strategic Sustainability Performance Plan is along the same lines of the United Kingdom's Finance Ministry directive. The main difference is that the Strategic Sustainability Performance Plans are not tied to agencies' budgets. One would imagine that if each federal agency had to explain how each budget line supported sustainability

principles, the process would be more rigorous than writing a list of things the agency plans to do to become more sustainable in the future.

Interdisciplinary Participation

Since stakeholders and others with a vested interest in the success of sustainability initiatives often have valuable perspectives on strategy development and performance evaluation, it is reasonable to offer them an advisory seat at the table.

A successful example of involving non-state participants is in Ireland, where the government has created a National Sustainability Partnership (NSP), which advises ministers on sustainability issues. The NSP has an independent chairperson and includes members from different levels of government, as well as representation from academia and civil society. In order to support Ireland's NSSD, the NSP tries to reach consensus about specific sustainability policies, plans, and programs. Although reaching consensus is rare, the consensus-building process allows voices that have traditionally been on the outside of governing processes into the debate before the decisions are made (Steurer and Martinuzzi, 2005, 464).

As was clear in the case of the Chicago Metropolitan Agency for Planning, support of non-governmental organizations, specifically from the civic group Metropolis 2020, was key to the agency's creation and continued legitimacy. Somewhat similarly to Ireland's NSP, the U.S. President has the Council on Environmental Quality, and President Clinton created the Council on Sustainable Development. The limitation of the

councils is that they are rooted in the executive branch and have little opportunity to engage in direct debate with lawmakers.

Strong political will from the highest levels was necessary to undertake sweeping policy changes in Switzerland, the United Kingdom, Ireland, and other EU countries with successful, innovative NSSD practices. Just creating sufficient momentum to shift away from the status quo in a bureaucracy as immense as a national government is a feat in itself, let alone trying to integrate traditionally separate governmental powers.

If one accepts President Obama's executive order on sustainability and the Congressional directive to HUD and DOT to increase collaboration as signs of adequate high-level political commitment, this suggests that the Partnership for Sustainability could take its mandate as a license to import some best practices from abroad. Recommendations that follow in the final chapter are intended to inform the process of adopting best practices and strengthening the impact of the Partnership for Sustainable Communities.

Recommendations for the Partnership for Sustainable Communities

In the first chapter, I outlined the legal context and structural and historical-cultural characteristics of the Department of Transportation (DOT), Department of Housing and Urban Development (HUD), and the Partnership for Sustainable Communities. The purpose of the chapter was to understand how, why, and to what ends the Partnership for Sustainable Development is attempting to integrate land use and transportation planning. From the legal context, the direct motivation for the Partnership was clear: the Congressional and Executive branches (first under President Clinton and again under President Obama) have issued directives and orders for coordination between transportation and housing decisions to improve economic and environmental sustainability.

Analysis of the Partnership's organization and operation reveals that while the rhetoric of the Partnership Agreement suggests the goal of policy integration, the vague objectives in the agreement and weak linkages displayed between HUD, DOT and the Environmental Protection Agency (EPA) are indicative of basic policy coordination. Historical and cultural characteristics of HUD and DOT show the stark differences between the agencies' goals, ideologies, and methodologies. While DOT has historically emphasized mobility and efficiency from national, state, and regional perspectives, HUD

has worked on the community scale on issues of equity and development.

Up to now, the Partnership has pursued strategies of competitive grants for integrated planning initiatives, capacity building on regional and local levels, and research. The goal of these activities is to find innovative ways to minimizing the combined household expenditures on housing and transportation. At the same time, the Partnership is attempting to maximize energy efficiency and minimize the environmental impact of the built environment.

The second chapter, turning to the Chicago metropolitan region, which has embarked on developing an integrated land use and transportation plan, examined a current process of creating “sustainable communities.” As with the national Partnership, the process in Chicago is more of coordination, rather than true integration. This was evident due to the separate strategies for housing and transportation that had practically no overlap, besides the fact that they will be part of the same final plan. The process also mirrored DOT's focus on efficiency in transportation and HUD's emphasis on equity in housing.

The main challenge facing the Partnership for Sustainable Communities is how to transcend policy coordination to reach policy integration. Policy integration goes beyond dialog and data sharing to create a set of shared policy goals that guide implementation strategies and create synergies (Geerlings et al., 2003, 188-189). Reviewing best practices from national strategies for sustainable development in the EU, which have had more time to make progress than the Partnership for Sustainable Communities, informed the

following recommendations for facilitating policy integration in the Partnership.

Recommendation 1: Create a working group dedicated to developing integrative strategies with representatives from other levels of government, civil society, professional organizations, and academia.

The Partnership has declared its intention to create working groups to support its work, though it has not released full descriptions of these working groups. In February and March 2010 HUD conducted a series of “Listening Sessions” in eight cities around the country and six webcasts. The purpose of these sessions was to gain insight into how HUD can create a context for sustainable regional planning. These one-time events are a nice gesture of participatory policy development, but vertical integration requires long-term institutionalized participation. This recommendation is based on Ireland's National Sustainability Partnership and Switzerland's Sustainable Development Forum. Ireland's National Sustainability Partnership is an independent, interdisciplinary group that advises ministers on issues of sustainability by debating specific policy and program proposals. The group has been effective at broadening the conversation on sustainability and making it relevant to policy making (Steurer and Martinuzzi, 2005, 464).

Switzerland's Sustainable Development Forum has accomplished a high degree of vertical integration in strategy formation and policy implementation. The Forum includes national, regional, and large city government representatives, and it is closely tied to the

association of regional governments and the association of city governments. As a tool for policy implementation, the Forum helps quickly disseminate information about sustainability initiatives. As a tool for strategy formulation, members of the Forum collaborate on sustainability projects and help push the national sustainability agenda forward (Steurer and Martinuzzi, 2005, 462).

An interdisciplinary working group for the Partnership for Sustainable Communities could provide valuable perspectives and wider, more innovative implementation strategies. A logical vehicle for such a working group would be the National Council for Science and the Environment (NCSE), which has published recommendations on achieving sustainable communities with a more biocentric approach than is evident in the Partnership for Sustainable Communities (NCSE, 2001). By contributing new voices the working group would be an opportunity to break out of the DOT and HUD paradigms and historically anthropocentric approach to sustainability. Presumably, the EPA joined the partnership to provide some of these benefits; rather than equity and mobility being the primary goals, the EPA offers a more holistic understanding of the impact of the built environment on ecological health and productivity. But the EPA is not enough.

Potential participants in the working groups are representatives of the U.S. Conference of Mayors, which has shown great imitative in issues of sustainability; the National Association of Regional Councils, which includes Metropolitan Organizations and Councils of Government; the U.S. Chamber of Commerce; the American Planning

Association; the National Association of Home Builders; and the American Public Transportation Association.

Recommendation 2: Develop sustainability indicators that become part of the mandatory reporting responsibilities for all recipients of federal transportation, housing, and related grants

This recommendation addresses the need to integrate the political and administrative activities. It will also produce a set of compatible, reliable data on sustainability, which the Government Accountability Office has found is severely lacking (GAO, 2009a). This idea is based on a policy of the United Kingdom's Finance Ministry. In collaboration with the Department of Environment, Food, and Rural Affairs, the Finance Ministry required all government departments submitting budget reports to supplement the standard report with detailed information about how the budget expenditures adhered to the national sustainability strategy (Steurer and Martinuzzi, 2005, 463).

Rather than place the entire reporting burden on the agencies, it would be reasonable to assign part of the responsibility to those awarded federal grants. In the same way financial reporting is subject to audit, the Office of the Inspector General would then be responsible for auditing sustainability reporting to help ensure high reporting standards. The agencies could then use the data to create meaningful performance

measures.

For an example of how this would work, take the Federal Transit Authority's (FTA's) Urbanized Area Formula Program. This grant can go towards a variety of transit-related planning and capital expenditures. Currently, the only way FTA verifies that the money is going to a "good" project is that the project is on its Metropolitan Planning Organization's approved list of transportation improvement projects. Although MPOs are regional planning bodies, their capacity for integrated transportation and land use planning is limited (Oden and Woods, 2007).

To understand the implications of individual transit projects for sustainability issues, it would be useful to gather data on whether the project increased access to or the security of transit in general and for various target populations (elderly, youth, low-income); how the project improved access to public services, job and education centers, and health care services; how the project affected property values or development patterns in the near vicinity; whether the project increased the viability of non-motorized modes of transportation, such as biking and walking; and whether the project contributes to a transportation network that directs growth towards areas of existing development.

These recommendations are not radical changes to the structure or goals of the Partnership for Sustainable Communities. In broad terms, the Partnership is following the path to sustainability set forth by the United Nations Conference on Environment and Development in 1997. Since the U.S. has waited longer than other countries to attempt a

nationwide strategy, it is reasonable to believe that the U.S. can use other countries' examples as a guide. What is crucial is that we not let a good crisis—the mortgage crisis—go to waste and lose the momentum currently building to integrate land use and transportation planning in the United States.

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