THE EFFECT OF REGIONAL PLANNING COUNCILS ON THE DEVELOPMENT OF FEDERALLY ASSISTED HOUSING

by

MORRIS B. COFFEY

A THESIS SUBMITTED IN PARTIAL FULFILLMENT OF THE REQUIREMENTS FOR THE DEGREE OF

MASTER OF ARCHITECTURE IN URBAN DESIGN

Thesis Director's Signature:

O. Jack Mitchell

Houston, Texas

May, 1972
ABSTRACT

THE EFFECT OF REGIONAL PLANNING COUNCILS ON THE
DEVELOPMENT OF FEDERALLY ASSISTED HOUSING - Morris B. Coffey

Since 1965 the Federal government has increasingly strengthened its support of the establishment of Regional Planning Councils. The Federal government has enacted legislation designating multijurisdictional/multipurpose agencies to serve as "clearinghouses" with authorization:

1) to devise comprehensive regional plans for coordinating development within a region;

2) to review and comment on selected federally assisted programs.

With the issuance of Executive Order, OMB Circular A-95 (7/24/69) and later A-95 (revised - 4/1/71), the number of federal programs requiring regional review and coordination was vastly expanded. Included in the new "clearinghouse" responsibilities were all federally assisted/insured housing programs.

The intent of this study is to show that Regional Planning Councils, because of their areawide orientation and scope of concerns, have a significant role to play in the development of low and moderate income housing. This role is analyzed in terms of a council's ability to (1) insure environmental quality, (2) increase production, and (3) direct the distribution of federally assisted housing within a region.

From this analysis, it is found that Regional Planning Councils by
exercising their planning and review prerogatives can impose guidelines and standards on the development of housing directly affecting the three areas mentioned above. However, the present lack of legislative authority coupled with limitations in the "clearinghouse" review procedures for housing applications (as described in OMB Circular A-95) limit the ability of Councils to implement plans and policies. Councils have the authority to establish regional housing plans and policies, but the extent to which they will be implemented is dependent upon the voluntary support and cooperation of local member governments and federal agencies.

Thus, political acceptance of the need for a regional approach to providing low and moderate income housing is a primary determinant of a council's effectiveness in dealing with housing problems.

When such support is not possible, Regional Planning Councils must rely on the strength of their "negative" review authority, and on their ability to provide technical assistance and information as a means of indirectly affecting the builder or developer's decision making processes.

The potential for regional planning agencies to assume a more assertive role in the implementation of housing plans and policies will be dependent on added Federal endorsement. One such proposal presently being considered by Congress designates areawide planning agencies as distributors of federal funds. With this, Councils would have the necessary authority to implement regional housing plans.
# TABLE OF CONTENTS

## LIST OF ILLUSTRATIONS

## INTRODUCTION

1. **100 REGIONAL PLANNING COUNCILS**
   - 110 Origin
     - 111 Fractionalized local governments
     - 112 Regional planning
     - 113 Federal incentives
   - 120 Characteristics
   - 130 Functions
     - 131 Review and comment
     - 132 Comprehensive planning
     - 133 Implementation of comprehensive plans
   - 140 Observations

2. **200 REGIONAL APPROACH TO FEDERALLY ASSISTED HOUSING**
   - 210 Background
     - 211 Federal housing policy
     - 212 Housing element in Comprehensive Planning
     - 213 Review process for housing
   - 220 Planning and Review
     - 221 Case Study I: Houston-Galveston Area Council
     - 222 Case Study II: Miami Valley Regional Planning Commission
   - 230 Information Compilation and Promulgation
     - 231 Determination of existing regional housing needs
     - 232 Determination of future regional housing needs
   - 240 Conclusions

3. **300 NEW DIRECTIONS**
   - 310 Proposed Federal Housing Legislation
   - 320 Recommendations
   - 330 Summary

## APPENDICES I - V

## FOOTNOTES

## BIBLIOGRAPHY
LIST OF ILLUSTRATIONS

Figure 1 - Project Notification and Review System 29
Figure 2 - MVRPC Housing Dispersal Plan by Planning Units 67
Figure 3 - Environmental Decision Assistance System 87
Figure 4 - Major Routines in the Prototype Model 91
INTRODUCTION
INTRODUCTION

The "real" city includes the metropolitan area around the central city. And the critical city problems -- the problems of revenue, housing, transportation, unemployment, blight and poverty, among others -- are actually the problems of the "real" city and they will never be completely solved except on a "real" city basis -- on a metropolitan basis.

This statement made by Secretary George Romney, U.S. Department of Housing and Urban Development, is representative of the new approach the federal government is assuming to the solution of urban problems. Essentially the approach is characterized by an increasing emphasis on the coordination of federally assisted programs at the metropolitan as well as the local level. The federal intent is embodied in legislation which establishes institutional processes for the development of a national network of Regional Planning Councils. These Councils function as "clearinghouses" (See Appendix I) for the purpose of reviewing and coordinating federally assisted housing programs within the region.

Through their interjurisdictional and interprogrammatic perspective, "clearinghouses" provide the institutional processes for a new level of interaction between the public and private sectors. The implications of this metropolitan/regional approach on the physical development of the city provide the impetus for this study. Although these implications
could be examined in all areas in which the Federal government is involved, this study will focus on one aspect -- federally assisted housing.

Since the initiation of the low rent public housing program in 1937, the Federal government has invested over eleven billion dollars in direct housing subsidies and such related programs as urban renewal. Today a vast number of federal housing programs exist, running the entire gamut of subsidation from rent supplement to home ownership. Increasing federal involvement in housing is evidenced in the number of households which will benefit from federal housing funds. Presently, one out of every twenty-three Americans lives in a dwelling directly subsidized by Federal, State or local governments. This figure is expected to increase to one in eight by the year 1978, if the housing goals set by Congress are reached. 2

The federal housing programs developed over the past years have most often had conflicting results, typified by increasing concentrations of poor and minority groups in central city areas and the polarization of central city and suburbs. Clearly, as the federal involvement in the production of housing continues to expand at an increasing rate, the need for coordination of these programs on an areawide basis is intensified. In a recent speech Samuel Jackson, Assistant Secretary for
Community Development, expressed the importance HUD places on the role of regional councils in this approach:

... We (HUD) ask that Councils of Governments ("clearinghouses") bring their resources to bear on the housing problem. We look for a comprehensive housing strategy and appropriate programs to be specifically designed, and we ask that you monitor and harmonize efforts throughout your jurisdictions.

The time for change is upon us. We look to the Councils of Governments to be instruments of change, to influence patterns of growth, and to improve the quality of life for its residents. 3

In the short space of five years Regional Councils have gained a position in the decision making processes which determine how federal monies are spent for housing. ("Housing" as used in this study will refer only to housing which qualifies for assistance under the various federally assisted housing programs.) The intent of this study is to show that Regional Planning Councils, because of their areawide orientation and scope of concerns, have a significant role to play in the development of low and moderate income housing. This role is analyzed in terms of a council's ability to (1) insure environmental quality, (2) increase production, and (3) direct the distribution of federally assisted housing within a region.

This study is divided into three parts:

Part I describes the origin and development of Regional Planning Councils and their role in the urban development process as defined in federal
legislation. This background information establishes the basis for the analysis of Council functions in Part II.

Part II demonstrates through case studies the effects which Regional Planning Council functions have on the environmental quality/distribution/production of housing. The limitations of these functions in affecting the development of housing reveals the need for revision in review procedures and for additional implementation authority.

Part III examines trends in the present administration's policy toward Regional Planning Councils and the potential for regional planning agencies to assume a more assertive role in the implementation of housing plans and policies.
PART I

REGIONAL PLANNING COUNCILS
Part I is a historical perspective of the development of federal "clearinghouses". As used in this study the term "Regional Planning Council" will refer to a multijurisdictional/multipurpose organization which has been designated by both State and Federal governments as "a clearing-house agency," having the authority to:

1) review federal loan and grant applications as described under Section 204 of the Demonstration Cities and Metropolitan Development Act of 1966;

2) conduct comprehensive planning as defined under Section 701 of the Housing Act of 1954.

The purpose in this section is to provide the background and development of Regional Councils and the basic statutory parameters within which they must function. Many of the limitations which Regional Planning Councils encounter in dealing with the housing problem reflect the inherent weaknesses in the basic functional and organizational characteristics of Regional Planning Councils, as defined in federal and state legislative provisions. Thus, this section will have the added purpose of establishing the nature of these limitations. An understanding of these limitations will serve as a foundation for the analysis in Part II of the effects which Regional Councils now have on the development of housing in an area. Later in Part III the emphasis will be brought to
bear on the role which Regional Councils could have on the development of housing if they were endowed with additional implementation authority.
Multijurisdictional bodies for the purpose of addressing "urban problems" on a metropolitan basis developed in response to several identifiable forces:

1) the inability of fractionalized local governments to cope with complex urban problems of a metropolitan nature;

2) the recognition by all governmental jurisdictions of the need for areawide coordinative planning;

3) the existence of federal incentives.

Fractionalized Local Governments

With the Twenties a new urban growth pattern emerged. This pattern was characterized by the development of metropolitan areas composed of a central city and smaller surrounding municipalities. Initially rural migration tended more directly to central cities. However, since the Twenties, metropolitan suburbia has been growing faster than central cities.

By 1960, 70% of the population lived in urban places and 63% lived in metropolitan areas. The metropolis, or the SMSA, has come to characterize the pattern of American settlement. Roughly defined, it encompasses a city of more than 50,000 and the counties which contain it and maintain a certain economic and social dependence.
Accompanying the development of metropolitan areas has been the unprecedented growth in the number of local governmental units.

By 1962 the metropolitan areas contained 18,442 local governments. Of these, 6,004 were school districts, 5,411 were non-school special districts, 4,142 were municipalities, and 310 were counties.²

A development of more recent vintage has been the proliferation of special districts, a group of local governments now more numerous in SMSA's than any other type. As the term implies, most of these units are like school districts in that they are concerned with only a single function, such as fire protection, water supply, or public housing. On the other hand, they are geographically like municipalities in that they do not blanket the entire state. These have come into existence one by one, for particular local areas and in most cases by local action under a general State law.

Nationwide, the number of special districts has nearly doubled in the past 15 years, with much of the change taking place in SMSA's. A small portion of the proliferation can be traced to the need - arising from the sprawling nature of the large metropolis - for public agencies having the ability to handle specific public services for areas larger than a single county. Of the 7,049 special districts in SMSA's, 527 are multi-county districts that deal with "large-area" functions such as air pollution, airports, and mass transportation.³ (See Table 1)

Clearly many of the problems accompanying metropolitan growth do not respect arbitrary jurisdictional boundaries. Problems such as transportation, air pollution, water and sewers, etc. demand regional
Table 1 - Local Governments in Metropolitan Areas, by Type of Government

<table>
<thead>
<tr>
<th>Type of Government</th>
<th>1967 Number</th>
<th>Percent</th>
<th>Increase or Decrease (-), 1962 to 1967 Number</th>
<th>Percent</th>
</tr>
</thead>
<tbody>
<tr>
<td>All Types</td>
<td>20,745</td>
<td>100.0</td>
<td>-1,113</td>
<td>- 5.1</td>
</tr>
<tr>
<td>School Districts</td>
<td>5,033</td>
<td>24.3</td>
<td>-2,057</td>
<td>-29.0</td>
</tr>
<tr>
<td>Other than School Districts</td>
<td>15,712</td>
<td>75.7</td>
<td>944</td>
<td>6.4</td>
</tr>
<tr>
<td>Counties</td>
<td>405</td>
<td>2.0</td>
<td>-</td>
<td>0.7</td>
</tr>
<tr>
<td>Municipalities</td>
<td>4,990</td>
<td>24.1</td>
<td>75</td>
<td>1.5</td>
</tr>
<tr>
<td>Townships</td>
<td>3,255</td>
<td>15.7</td>
<td>27</td>
<td>0.8</td>
</tr>
<tr>
<td>Special Districts</td>
<td>7,062</td>
<td>34.0</td>
<td>899</td>
<td>14.6</td>
</tr>
</tbody>
</table>

attention in order to avoid overlapping services and unnecessary expenses of both human and material resources. In this context, the problem was one of inadequate jurisdiction; there were too many local governments, and none with jurisdiction to contend adequately with the interrelated problems of the total urban complex.

112 Regional Planning

The political fragmentation existing within metropolitan areas made apparent the need for some form of coordinated planning efforts that would be regional in scope. Planning was not a new concept in American public affairs and was generally viewed as essential to the administration of the public's business. However, the problem that existed in metropolitan areas was not so much that planning was not being done but rather that within a given metropolitan area plans were being generated by countless agencies - each with its own planning orientation, geographical scope and particular prejudices. The narrow scope of these plans and the seeming isolation in which they were produced resulted in overlapping and often conflicting activity and goals.

The creation of multijurisdictional planning agencies during the Fifties was a response to this fragmented condition. Phillip Barnes, a scholar of Regional Councils, describes the position and nature of these agencies
as follows:

. . . regional planning commissions were appointed bodies of private citizens; they were only indirectly responsible to the public and yet were making public decisions. Further, these commissions were often not attuned to existing political considerations which limited and affected their choice of alternatives. Rather than being undemocratic elites dictating development policies or zoning practices or laying great plans for urban development, such commissions were largely ineffective in actual performance. 5

A plan is an official policy statement of some authoritative decision making body; therefore, planning is part of a political process. Its implementation is dependent upon the support of authoritative decision makers - elected officials and administrators with powers to make decisions. Because regional planning agencies were outside of these decision making processes, they were rendered essentially ineffective. 6

Realizing the need for a regional approach to urban problems, Congress sought to strengthen the position of areawide planning agencies.

113 Federal Incentives

The existence of fractionalized political units within metropolitan areas and the acceptance of the need for coordinative planning provided the basis for the movement toward multijurisdictional planning agencies. However, it was federal legislation that provided the real impetus for their growth and development.
Three forms of federal incentives have been used to encourage local officials to approach urban problems on an areawide scale:

1) planning requirements
2) planning assistance
3) mandatory referrals

1) Planning Requirements: The number of federal assistance programs grew rapidly during the Sixties, especially during the administration of former President Lyndon B. Johnson, and Congress gradually became aware of the difficulty of coordinating from Washington, D.C. federal grant programs. Moreover, the fragmented pattern of local government in metropolitan areas was actually reinforced by then-prevailing patterns of federal grant administration. "Comprehensive" regional or metropolitan planning, conducted by organizations representative of the political jurisdictions in the planning area, was considered a means for coordinating federal programs and for overcoming some of the limitations imposed on local governments by the configuration of governments in metropolitan areas. Thus the development of regional planning agencies was spurred by federal planning requirements imposed as a prerequisites for the receipt of federal grants-in-aid.

One of the most significant programs requiring comprehensive plans was the Federal-Aid Highway Act of 1962. The Highway Act included
requirements for the coordination of all transportation planning in urban areas. All projects involving federal funds were to be based on a comprehensive transportation plan for the region.

After July 1, 1965, the Secretary shall not approve under Section 105 of this title any program for projects in any urban area of more than fifty thousand population unless he finds that such projects are based on a continuing comprehensive transportation planning process carried on cooperatively by States and local communities in conformance with the objectives stated in this section.

Consequently, cities and states affected by this legislation became engaged in preparing such plans. Special transportation boards were established to coordinate and to provide comprehensive transportation plans for the metropolitan area.

Other federal programs which later included areawide planning requirements were the Water and Sewer Facilities Grant Program and the Legacy of Parks Program. At present, all 247 metropolitan areas are served by an areawide planning organization. In addition to the 208 planning organizations serving the 247 metropolitan areas, there are over 370 non-metropolitan district planning organizations.

2) Planning Assistance: Although the Federal-Aid Highway Act of 1962 implicitly established the requirement for some regional forum for the planning of urban transportation needs, it was not until 1965 that Congress explicitly endorsed the importance of Regional Planning Councils
per se as potentially effective mechanisms for dealing with urban multi-jurisdictional planning problems.\(^9\)

The Housing Act of 1954, as amended by the Housing and Urban Development Act of 1965, represents one of the most significant pieces of legislation relating to the development of regional planning organizations. The original "701 grant" provided matching funds to Localities to assist them in comprehensive planning efforts. In the amended section 701 grants Congress authorized the award of two-thirds matching grants to metropolitan planning agencies composed of elected officials.

In addition . . . the Administrator is further authorized to make grants to organizations composed of public officials whom he finds to be representative of the political jurisdictions within a metropolitan area or urban region for the purpose of assisting such other activities as the Administrator finds necessary or desirable for the solution of metropolitan or regional problems in such areas or regions. To the greatest extent feasible, all grants under this subsection shall be for activities relating to all the developmental aspects of the total metropolitan area . . . \(^{10}\)

These grants made it possible for regional planning organizations to begin performing their regional planning functions.

The Housing Act itself provided certain planning requirements. Under the terms of the Act and its administrative interpretation, communities in metropolitan areas are required to have the comprehensive regional planning programs for water and sewer facilities, open space, and land use in order to qualify for federal grant-in-aid programs in these
categories. Thus this legislation provides incentives for localities to seek out satisfactory ways of meeting planning requirements. In effect, the Housing Amendments of 1965 gave Congressional authorization to Regional Councils, provided them with financial stability, and imposed on metropolitan area governments the responsibilities of regional planning.

3) Mandatory Referrals: The Demonstration Cities and Metropolitan Development Act of 1966 and the Intergovernmental Cooperation Act of 1968 provide the statutory basis for mandatory referral of federal programs to areawide planning and review agencies. Section 204 specifies that applications for federal loans or grants in a number of functional areas "shall be submitted for review to any areawide agency which is designated to perform metropolitan or regional planning for the area within which the assistance is to be used. . . ."¹¹ (See Appendix II) These applications for loans and grants shall be accompanied:

a) by the comments and recommendations with respect to the project involved by the areawide agency . . . and

b) by a statement by the applicant that such comments and recommendations have been considered prior to formal submission of the applications.¹²

The review and comment requirements provided by Section 204 significantly strengthened the position of Regional Planning Councils. It
secured the role of Councils in intergovernmental activity and it provided an incentive for governmental officials in an area to create area-wide agencies in order to continue to receive funds for certain federally funded programs.

Title IV of the Intergovernmental Cooperation Act of 1968 went a step further and provided the basis on which Regional Planning Councils were to evaluate a project application. It provided for the development of comprehensive regional plans. These plans were to be developed by the Regional Planning Council and then used as the basis for its evaluation. The evaluation was to determine the consistency of the proposed projects within the context of the goals and objectives set forth in these plans.  

OMB Circular A-95 (along with its predecessor Circular A-82) was issued to implement the provisions of Section 204 and Title IV of the above mentioned acts. The Circular established a "network of State, regional and metropolitan planning and development clearinghouses to receive and disseminate information about proposed projects; to coordinate between applicants for Federal assistance; to act as a liaison between Federal agencies contemplating Federal development projects, and the evaluation of Federal or Federally assisted projects."  

Circular A-95 further establishes a Project Notification and Review
System (PNRS). Under the provisions of PNRS, prior to the processing of a grant application by a federal agency, evidence must be submitted by an applicant indicating that the appropriate state and metropolitan or regional "clearinghouses" have been notified of a proposed project. This process for reviewing applications permits the clearinghouse to arrange for consultation on the project with interested applicants for coordination purposes.

Many of the planning organizations formed in response to Nos. 1 (Planning Requirement) and 2 (Planning Assistance) later were designated as "clearinghouses" under the provisions of Circular A-95.
The several hundred "clearinghouse" agencies in the United States possess a vast array of differing functional and organizational characteristics. These agencies derive their characteristics from three sources: Federal and State legislation and local governmental support.

As seen earlier, the Federal government provided the major impetus for the creation of Regional Planning Councils. Federal legislation provided these agencies with two distinguishable functions:

1) the authority to "review and comment" on specified federal program applications;

2) the authority to generate comprehensive plans on which project applications are to be evaluated.

The combination of these two functions forms the basis for clearinghouse authority.

As defined in OMB Circular A-95, clearinghouses are divided into three types according to their geographical area and demographical construct:

1) State Clearinghouses: a statewide agency designated by the Governor;

2) Metropolitan Clearinghouses: an areawide agency whose region
includes an SMSA;

3) Non-Metropolitan Clearinghouses: an areawide agency whose region
does not include an SMSA. 

The term "regional" is also used to refer to non-metropolitan or pre-
dominantly rural areas. However, in many states the situation exists
where the state has been divided into planning regions which have met-
ropolitan areas within their boundaries. In this situation the "clear-
inghouse" is also often referred to as "regional" despite the presence
of a metropolis.

Clearinghouses may be further classified as being either "single pur-
pose" or "multipurpose" agencies. The scope of concerns of single
purpose agencies is limited to one area, i.e., Comprehensive Health
Planning Agency (314B Agency), Economic Development Districts or
Transportation Planning Agencies. However, their responsibilities
include both planning for and reviewing of all projects related to that
area. "Multipurpose" agencies, as the name suggests, are concerned
with the entire gamut of urban problems. They are primarily repre-
sented by such organizations as Councils of Governments (COG) or
Regional Planning Commissions. Councils of Governments for the
most part have elected officials on their boards, and Regional Plan-
ning Commissions are in many places expanding their membership to
include elected officials, thus allowing them to function as a COG.

There is a trend in federal policy reflecting a definite preference for multi-purpose clearinghouse agencies whose membership is primarily composed of elected officials. For this reason COG's and Regional Planning Commissions (those which have expanded their membership) promise to be the most popular forms of clearinghouse agencies. 16

As used in this text, the general term "regional planning councils" will be substituted for the more specific references to multipurpose clearinghouse agencies such as COG's or Regional Planning Commissions. No distinction will be made between metropolitan and non-metropolitan planning councils; here "regional" will be used to describe both conditions.

The characteristics and effectiveness of Regional Councils are further determined by State and local governments. Since all cities operate under charters from the State governments, the ability of cities within states to form cooperative organizations is controlled by state legislation. States provide enabling legislation for the creation of multijurisdictional planning agencies. Examples of the aspects relating to Regional Councils covered in state legislation are (a) the mechanics of their formation, (b) their authority to develop plans, (c) their authority to render technical assistance, (d) their authority to review state
funded programs, and (e) their authority to own and sell property. Each state has adopted its own approach to providing for regional planning. The degree of support which states give Regional Councils can greatly enhance their capabilities to function as planning and coordinating organizations.

An incentive for States to encourage the development of Regional Councils relates to the potential Councils have for attracting federal dollars. The Federal government has made it clear that in allocating national monies, it will favor projects which are considered within a regional context. The degree of sophistication which Regional Councils could demonstrate in carrying out their functions would enhance their ability to attract federal dollars. Therefore, States could find it to their advantage to strengthen the position of Councils through state enabling legislation.

Because Regional Planning Councils are voluntary organizations of local government, their very existence is dependent upon the support and cooperation of local member governments. Thus each Council is ultimately shaped "by the characteristics unique to its own metropolitan area, by the interest and qualifications of its member local officials and by the support or opposition of interest groups within the region." 17
The day to day operations and policies of a Council are supervised by an executive committee or board of directors. This governing board is traditionally composed of city councilmen, mayors, county commissioners, and other elected officials representing governments with membership in the regional organization. Frequently representation on this board may include specific larger units of government, special purpose districts, citizen representatives, etc. Because each of these elected officials on the executive board represents its own particular local contingency, the personnages of the Regional Council essentially reflect the political climate of the region.

The attitude of the executive board toward a regional approach to solving areawide problems determines the aggressiveness with which the Council can perform its functions. If the executive board is strongly in favor of a regional approach to solving a problem, and the member governments can reach certain cooperative agreements as to a plan of action, the Council can assume an assertive position in implementing the desired objectives. However, without this support, Councils must assume a more passive role - one which is less objectionable to the member governments.
As discussed earlier, "clearinghouses" have two statutory functions. This section will examine these functions as described in federal policy. The statutory parameters for regional review and comment and comprehensive planning are embodied in Section 204 of the Demonstration Cities and Metropolitan Development Act of 1966 and Title IV of the Intergovernmental Cooperation Act of 1968 respectively. It should be noted that Section 204 does not provide Regional Planning Councils with authorities traditionally associated with governments, such as the authority to levy taxes, pass ordinances, or require action from local governments; nor does it give Councils the power to veto an application for federal funds. Rather Section 204 provides for the review and recommendations of Regional Councils, prior to the formal submission of a program application. These recommendations then become part of the criteria on which federal funding agencies base their grant decisions.

Under Section 204 of the Demonstration Cities and Metropolitan Development Act of 1966, the Bureau of the Budget was given the responsibility for administering grant applications. In responding to its new
charge, Bureau of the Budget issued a series of Circulars describing "clearinghouse" review procedures. Efforts to improve the efficiency of the review process and to assist in the implementation of Section 102(2)(c) of the National Environmental Policy of 1969 resulted in the issuance of OMB Circular A-95 of January 30, 1970. Section 102(2)(c) required that an evaluation be made of a proposed project's environmental impact on an area prior to the project's approval by a federal funding agency. The evaluation was to be made by a designated environmental quality agency. The evaluation by such an agency was to accompany the project's application for federal funds. 18 (See Appendix II)

To implement the environmental impact evaluation, Circular A-95 established a Project Notification and Review System (PNRS). Essentially the PNRS may be thought of as an "early warning system" to facilitate coordination of State, regional and local planning and development assisted under some fifty federal programs. The following is a description of this process as described in OMB Circular A-95 (revised) which is the latest circular issued.

When a potential applicant (State or local agency, or other) has decided to apply for federal assistance, under certain designated federal programs (See Appendix III), he is required to notify both the State and,
as appropriate, the regional (non-metropolitan) or metropolitan "clearinghouse" of his intent to do so. The notification is to include a brief summary description of the proposed project. The "clearinghouse" has thirty (30) days in which to indicate its interest and to arrange for consultations on the project. If the "clearinghouse" notifies the applicant that it has no interest in or that there are no problems with the proposed project, the applicant has fulfilled his obligation and he need not consult the "clearinghouse" before completing and submitting the final application to the federal agency.

On the other hand, if the "clearinghouse" indicates during the initial thirty (30) day period an interest in reviewing the completed application, conferences are arranged. During this period of consultation, the applicant will continue preparing his application. It is during these conferences that the "clearinghouse" may assist the developer in the resolution of any issues and conflicts which have surfaced during its evaluation of the proposed project. At any point when such problems are resolved, the "clearinghouse" may "sign off," concluding the review.

Thus with the advice and assistance of the clearinghouses, by the time the application is completed either (1) all issues (if any) will have been resolved or (2) any remaining issues will be clearly identified. If necessary, a clearinghouse may have an additional thirty (30) days in which to file comments to accompany the application.
The following is a diagram describing the step by step procedures of the Project Notification and Review System. (See Figure 1)

132 Comprehensive Planning

In addition to the great potential influence given to "clearinghouses" as evaluators, Title IV of the intergovernmental Cooperation Act also establishes the basis upon which evaluation can be made. The Act calls for consistency ("to the maximum extent possible") between federal development activity and regional comprehensive planning. This evaluation task coupled with PNRS process forms the basis for the relationship between "clearinghouses" and local units of government. If "clearinghouses" have any semblance of government, it rests in their authority to evaluate a proposed project in the context of a comprehensive regional plan which they too prepare. Out of the evaluation exercise comes the Council's "comments" pertaining to the project's compatibility with the comprehensive regional plan.

A negative review sets the stage for negotiations between the applicant and the Council. During this critical period the Council will attempt to resolve the conflicts between the proposed project and the regional plan. The possibility that a "negative review" by the Council will result in the withholding of federal funds, provides the incentive for the applicant to negotiate conflicts.
In order to support both metropolitan and non-metropolitan "clearing-houses" in their "comprehensive planning" function, Section 701 of the Housing Act of 1954 was again amended in 1968. The amended Section 701(g) of the Housing and Urban Development Act of 1968 expanded eligibility to include all multi-county district planning agencies in both metropolitan and rural areas. In this way federal support for planning was extended to cover geographically every part of the nation. Section 701(g) expanded not only the scale but also the scope of concerns in comprehensive planning efforts. It specifically listed those elements which the comprehensive plan was to include. Significant here is the introduction of the housing element as a requirement for funding.

... To the maximum extent possible, all agents under this subsection shall be for activities relating to all the developmental aspects of the total metropolitan area, region, or district including, but not limited to, land use, transportation, housing, economic development, natural resources development, community facilities and the general improvement of the environments. 20

The Department of Housing and Urban Development further sets forth the purpose and contents of "comprehensive planning" in its Handbook-Comprehensive Planning Assistance - Requirements and Guidelines for Grants. This publication, issued in March 1968, has been periodically revised and updated. The most recent Handbook, dated September 1971, initiated a new approach to administering the Comprehensive Planning Assistance Program. This new approach is characterized by an
emphasis on the improvement of decision making and executive management at the State and local levels. The purposes of this program are to:

a) encourage State, local and areawide officials to improve executive planning, decision-making, and management capability and to establish and improve their staffs and techniques;

b) encourage community planning and management as a continuous process;

c) assist State and local governments and areawide agencies to solve problems, realize opportunities and formulate and implement policies related to community development and growth for urban and rural areas.  

By encouraging chief executives of State and local governments "to formulate and coordinate community development strategies and to make and carry out decisions," the HUD guidelines seek to lessen the gap between planning and implementation. Inherent in this thrust toward coordination and implementation is the importance of the role of areawide agencies because of their regional planning efforts.

133 Implementation of Comprehensive Plans

The role of Regional Planning Councils in the implementation of comprehensive plans ultimately depends on their ability to shape governmental investment decisions within the region. The A-95 process has been the basic tool provided for affecting these decisions. It should be recognized that nowhere in the A-95 process is the federal
funding agency or the governmental agency which is seeking to act directly mandated to abide by the "clearinghouse" evaluation. The strength of the process lies in the potential that a negative review and comment will result in a withholding of government funds. This potential provides Councils with a degree of leverage to encourage applicants to negotiate changes in their project proposal so that such proposal will be compatible with regional objectives and guidelines.

Melvin Mogulof, in a recent field study concerning the governing potential of Regional Councils, argues the strength of a "clearinghouse" evaluation in determining the allocation of governmental resources. To substantiate his point, Mogulof constructs a sequence of activities which demonstrates the potential of the review process as "a powerful system of action." The sequence is as follows:

- COGs can be given funds for comprehensive areawide planning under Section 701(g) of the Housing Act of 1954 as amended;
- COGs can be recognized as areawide "clearinghouses" with a task of evaluating proposed Federal action;
- COGs can seek Federal action which will be consistent with the COGs own comprehensive planning. The potentials of the system are that COGs can have the resources with which to do comprehensive areawide planning; Federal agencies can be asked to act consistently with such plans; and COGs can evaluate proposed Federal action against its consistency with the plans which the COG has drawn.

Even in this situation where comprehensive plans exist to serve as a basis for evaluation and federal agencies have been admonished to abide by the Council's recommendation, the Council is still dependent
on the cooperation of external organizations to implement its decision. Implementation authority ultimately lies with the agency which has veto power over how government monies will be spent.

Even though the number of federal programs included under the A-95 process has been drastically increased in the past five years, not all federal programs are subject to regional review. This fact poses another limitation by allowing many investment decisions to be made outside the realm of influence of Regional Councils.

Further, the national government's recent ambivalence toward Regional Councils provides another hindrance to their capacity to serve as a planning agency. On the one hand the Federal government has encouraged the establishment of Councils by increasing their responsibilities while on the other hand it has in effect reduced its financial support of Regional Councils. As seen earlier, Section 701 grants have long been the financial basis for council activities and development. Since their establishment, both the number of Councils competing for federal funds as well as the number of programs requiring "clearing-house" review have increased; however, the 701 funds have not. The effectiveness of the evaluation process presupposes the existence of ongoing and extensive planning efforts. Without adequate federal financial support of these efforts, the burden falls on State and local
organizational characteristics of Regional Planning Councils vary greatly as determined by state enabling legislation and the degree of support of local member governments.

4) Regional Planning Councils do not have the authority to veto or approve applications for governmental funds. Therefore, the implementation of their recommendations and ultimately their comprehensive plans are dependent upon the voluntary support and cooperation of local member governments and federal funding agencies.
PART II

REGIONAL APPROACH TO FEDERALLY ASSISTED HOUSING
Part II examines the effects which Regional Planning Councils can have on the environmental quality/distribution/ and production of federally assisted housing. To facilitate this analysis, Regional Council functions have been divided into two broad areas:

1) Planning and review

2) Information compilation and promulgation.

"Planning and review" have been grouped together because of their inter-dependence in Council's evaluation process. The activities carried out by areawide planning organizations vary considerably due to differences in organizational arrangements and the length of time each has been in existence. Numerous areawide planning organizations have been formed within the last four years and are at various stages of maturity. The functions performed by these organizations vary in sophistication often reflecting the organization's stage of maturity. For this reason specific case study examples have been selected for each of the functional areas to describe more accurately what potential exists for Regional Councils to affect housing.

The emphasis in examining the planning the review procedures is on determining:

1) how a council uses its review process - in relation to the guidelines and standards established in its comprehensive plan - as a tool for
evaluating projects;

2) the ability of a council to implement guidelines and standards.

For this purpose two examples have been selected - the Houston-Galveston Area Council and the Miami Valley Regional Planning Commission (Ohio). These two Councils have been chosen because at present their respective review processes represent two different approaches for evaluating a proposed application.

Presently the H-GAC is in the first phase of a two-phase process for developing a comprehensive planning methodology for the region. Phase I includes a land use inventory of existing conditions and projections for how development will occur in the area based on regional economics, development trends and accommodation requirements of land use by function. Phase I is not an attempt to state that "this is how the area should develop," but rather that "left to its own devices, this is probably how the area will develop." At this stage the H-GAC review and comment process is representative of one method of evaluating housing applications - that being in terms of compatibility with existing and projected development in the region.

The Miami Valley Regional Planning Council has taken a different approach in that it has developed a regional housing plan (The Dayton
Plan) for distributing federally assisted housing throughout the region. This plan specifies that a certain number of housing units be located in the various "planning units" composing the region. In attempting to implement the plan, the Regional Council is intervening in the natural development processes in the area by evaluating applications in terms of what the Council has established as what should be vs. what is. The review procedures of both of these Councils are similar - the major difference lying in the nature of their comprehensive plans on which their project evaluations are made.

The second function examined in Part II is information compilation and promulgation. From the vantage point of their multipurpose, areawide concern, Regional Councils are assuming an increasingly important role in providing technical assistance and information. Two examples of informational systems specifically relating to determining housing supply and demand are presented here. Both systems are in the process of being developed; they differ basically in their orientation - one being concerned with the existing housing situation, the other with forecasting what the housing situation will be. Both of these informational systems are representative of the kinds of tools clearinghouses can initiate to enhance their capabilities as informational exchange centers and planners. The emphasis in examining these two systems is on determining:
1) what kinds of information will be generated;

2) how can this information be used both by the Council and by those involved in the production of housing.
Before analyzing the effects of Regional Council functions on the development of housing, it is necessary to establish the federal intent in making federally assisted housing programs subject to clearinghouse review. The following discussion recapitulates the major events leading to a regional approach to housing and the major differences in the review process for housing programs and the review process for other federally assisted programs.

The primary thrust of early federal housing policy was directed at producing more housing units. The first major federal measure to deal directly with the housing problem was the United States Housing Act of 1937. This Act undertook:

... to assist the several States and their political subdivisions to alleviate present and recurring unemployment and to remedy the unsafe and unsanitary housing conditions and acute shortage of decent, safe and sanitary dwellings for families of low income, in rural and urban communities, that are injurious to the health, safety and morals of the citizens of the Nation.  

Under this legislation, slum clearance was coupled with low-rent housing, and an "equivalent elimination" requirement assured the upgrading of housing in local communities. Thus, a community could not receive
annual contributions for a low-rent housing project unless provisions were made to eliminate an equivalent number of substandard dwellings as the number of public housing units to be constructed. The elimination could be accomplished by repair and rehabilitation as well as by complete demolition. However, by the end of World War II it became apparent that the programs of this nature were not adequately solving the rapidly increasing need for additional low-income housing or the problems of urban decay.

This realization eventually led to the passage of the Taft-Ellender-Wagner Bill, the Housing Act of 1949. In this Act Congress declared as a national policy "the realization as soon as feasible of the goal of a decent home and a suitable living environment for every American family." To accomplish the goal, the Act provided for an extended low-rent public housing program (810,000 units) and for a federal program of slum clearance and community development and redevelopment. These means soon proved to be quite inadequate; new slums formed faster than the old ones could be cleared away. Even though the means provided by the Housing Act of 1949 were inadequate, Congress had made a commitment to housing and this commitment formed the basis for the subsequent expansion of federal housing programs and concerns.
Housing legislation of the Fifties broadens the concept of slum clearance and community development to include a concept of preventive action against blight and slums. Important in the Fifties is the development and increased emphasis placed on "comprehensive planning." As seen earlier, federal provisions in the 1954 Housing Act for comprehensive planning mark the beginning of a conscious attempt to coordinate federal programs at the local level.

With the '60's, the conflicts in federal programs directed at urban problems became increasingly apparent. It was evident that solutions (i.e., low-rent public housing, urban renewal) adopted to solve the national housing problem had not accomplished the desired result. Federal housing policies appeared to be at odds with other federal programs. Freiden describes these contradictions in the The Metropolitan Enigma as follows:

Some programs - chiefly FHA mortgage insurance, federal aid for highways that stimulate suburban growth, and aid for suburban water and sewer systems - accelerate the pace of new housing construction in the suburbs and the turnover of central-city housing. Others - principally urban renewal and aid for mass transit - aim at reviving the central cities and stemming the flight to the suburbs. Urban renewal in turn depletes the supply of low-cost housing and thus slows the turnover effects stimulated by national housing policy. The programs that favor suburban growth promote population desegregation between central cities and suburbs, which runs counter to civil rights goals. This same dispersal handicaps the central cities in their efforts to supply adequate services for low-income groups, countering other national goals of eliminating poverty and providing equality of educational opportunity. 3
The realization of these conflicting policies lead to the realization that simply approaching the housing issue from the standpoint of production was not enough; and that it was necessary not only to coordinate housing programs but also to coordinate them with the full range of federal efforts.

212 Housing Element in Comprehensive Planning

The major impetus for considering housing in a broader context of community development came in the Housing and Urban Development Act of 1968. In it the 701 Comprehensive Planning Assistance Program (Housing Act of 1954) was brought to bear on the problem of housing. The amended Section 701(g) required that "planning carried out with assistance under this section shall also include a housing element as part of the preparation of comprehensive land use plans. . ." This amendment, requiring a housing element, was considered a critical part of a national effort to achieve the national housing goal established by the Housing Act of 1949 of "a decent home and a suitable living environment for every American family." The adoption of the "housing element" requirement formalized the relationship between housing and the other elements of comprehensive planning. Under these terms of eligibility, all applicants for 701 planning assistance had to prepare a housing element as a part of their comprehensive planning activities.
The "Housing Element" as described in the HUD Comprehensive Planning Assistance Handbook should:

1) identify and analyze the need, problems and opportunities for the construction, conservation and rehabilitation of all housing of the planning jurisdiction;

2) define strategies by which housing need can be met;

3) establish housing planning, programming and technical services where there are none;

4) be coordinated with and build upon the housing efforts of other public and private agencies. 4

The determination of housing need aspect is one activity in the "housing element" that has been increasingly emphasized in federal policy. This is reflective of the shift of emphasis in the basic philosophical concept of federal housing legislation from a concentration on the ability to produce housing as a determinant for allocation of funds to a concentration on need. Housing legislation before Congress at present, "places virtually total emphasis on need as the determining factor in the approval of participation in Federal programs."5 The import of this legislation will be examined later in this study.

It should be kept in mind at this point that in its comprehensive plan, the Council establishes its objectives and guidelines for housing
development. The review and comment process becomes the tool for evaluating the project vis-a-vis the comprehensive plan.

213 Review Process for Housing

Directly related to the 701 housing element is the extension of the A-95 process to include the review of federal housing programs. Under OMB Circular A-95 (revised) clearinghouse activity was extended on April 1, 1971, to cover all HUD assisted or insured housing developments involving subdivisions having fifty (50) or more lots, and multifamily housing developments having 100 or more units.

Because of the unique nature of the application and development process for housing programs, a variation of the A-95 review procedure was developed. Essentially this procedure differs in:

1) The Method of Notifying the "Clearinghouse" - instead of the applicant notifying the "clearinghouse" directly, he first notifies the HUD Area or Insuring Office which transmits a copy of the initial application to the appropriate State clearinghouse and metropolitan or non-metropolitan clearinghouse.

2) The Time for Clearinghouse Review - the Clearinghouse has fifteen (15) days rather than thirty (30) days to review the applications and to forward to the Area or Insuring Office any comments which it may have. The nature of these observations will include:
a) the consistency of the proposed project with State and areawide
development plans;
b) identification of major environmental concerns (This is in par-
tial fulfillment of the implementation of the Environmental Qual-
ity Act). Processing of the application in the Area or Insuring
Office will proceed concurrently with the clearinghouse review.

3) Project Size - project size is a factor in reviewing housing applica-
tions; the clearinghouse is required to review only applications in-
volving new construction and this will apply only to projects of a
certain minimum size:

a) Subdivisions having 50 or more lots involving any HUD home mort-
gage insurance program;
b) Multifamily projects having 100 or more dwelling units under any
HUD mortgage insurance program, or under conventional or turn-
key public housing programs;
c) Mobile home courts with 100 or more spaces;
d) College housing provided under the debt service or direct loan
programs for 200 or more students.

The following is a brief description of the steps involved in the review
process of housing applications. Under HUD housing assistance pro-
duced, a developer submits what is in effect a preliminary application
to a HUD Area or Insuring Office. The application contains a description of the project, detailed enough for HUD to evaluate it, but lacking in construction plans. This pre-application represents the developer's requests for a "feasibility analysis" to be conducted for his project.

At this point, the HUD Area or Insuring Office begins its own evaluation of the project's economic feasibility and transmits a copy of the application to the appropriate state and metropolitan or regional clearinghouse. If a HUD Area or Insuring Office feels that a possible conflict exists, it has the option of submitting an application for clearinghouse review regardless of project size. The clearinghouse will then have fifteen (15) days to review the applications and forward back to the Area or Insuring Office any comments which it may have. These comments will concern the consistency of the proposed project with the Council's comprehensive plan and the identification of any questions of environmental impact.

It is during this fifteen (15) days period that clearinghouses have the opportunity to make their contribution. It must take the proposed housing project and attempt to examine it in the context of all the existing and proposed development taking place in the area. Once the application is returned to the HUD Area or Insuring Office, the clearinghouse comments and recommendations are utilized as tools in assisting the HUD Area or Insuring Office in its own evaluation process.
These federal agencies then make a final decision as to whether or not they will assist or insure a given project. In some instances they may elect to specify certain conditions with which the developer must comply before acceptance of a proposed project application. In either case, both the applicant and the clearinghouse are informed of the decisions made by the HUD Area or Insuring Office.

Because of local zoning and subdivision controls on local comprehensive plan requirements, clearinghouse inputs may be minimal with respect to many or most individual projects with the exception of those of major size or strategic location. However, it is impossible to ignore the technical assistance and added scope of concerns which the clearinghouse review process brings to bear on project evaluation.

The flexible language concerning the A-95 process and the nature of comprehensive plans has actually encouraged clearinghouses across the country to develop their own process for evaluation within the basic framework of Circular A-95 and HUD guidelines. Recognizing this fact, the study will utilize specific examples in the following discussion of the effect of Regional Councils on the development of housing. By selecting examples which have reached a certain level of sophistication in their review and planning activities, it is hoped that they will demonstrate accurately what role Regional Councils are presently playing in housing.
In 1965 the State of Texas authorized the creation of Regional Planning Commissions under Article 1011m, Vernon's Annotated Texas Civil Statutes, entitled "Regional Planning Commissions." Significant amendments were added to this law by the 61st Texas Legislature in 1969 which expanded the authorities of Regional Councils. Included in the amendments were: (1) definition of a "comprehensive development planning process", (2) recognition of Regional Councils as political subdivisions of the State, (3) permission for a Regional Council to perform services to member governments by contract, (4) authorization to acquire real and personal property and to provide for State financial assistance to qualifying organizations, and (5) permission to cooperate on an inter-State or international basis, with advance approval of the Governor.

With the initial legislation in effect, the Houston-Galveston Area Council was officially created in 1966. Later in 1967 it was designated by the State and HUD as the Metropolitan Clearinghouse to review federal assistance applications from its thirteen-county area, known as the Gulf Coast Area Planning Region.
The H-GAC serves as both the Regional Planning Council and the Council of Governments for its thirteen-county area. As a voluntary association of governmental entities, it has no taxing or police powers. Its responsibilities are to "coordinate regional efforts to the maximum benefit to the total Planning Area." The purpose here is to examine the H-GAC's approach to planning and review functions, as relating to housing, and how this approach affects the development of housing in the region.

For the past several years the Council's planning efforts have been directed toward the development of a strong land planning inventory against which any policy formulation could be registered and evaluated as to its responsiveness and applicability at the local regional level. The completion of the comprehensive land use "plan" represents the first phase in a two-phase process for developing a comprehensive planning methodology for the Houston-Galveston area region.

The findings of the first phase of planning are presented in a report entitled *Phase I Comprehensive Planning*, published in 1968. This report, which is presently being updated to correlate existing land use with the 1970 census information, reflects only the area's propensity for development. That is, based on regional economics, development trends and accommodation requirements of land use by function, this
is how the area will probably develop if left to its own devices. The report does not state that this is how the area should develop; these questions are to be considered in the Phase II component of the Comprehensive Plan.

In 1968 the H-GAC conducted another study which addresses itself more specifically to the housing situation in the region. The study is entitled *Environmental Deficiencies of the Region's Living Areas -- A Diagnostic Survey*. This survey was prepared for the purpose of identifying within the region the problems of deficient environment. It attempts to relate human, physical and natural resources in its analysis to the housing and related environmental deficiencies in the region. Environmental deficiency was determined in terms of:

1) water (water supply/sewer systems)
2) air pollution
3) ground (maintenance of open areas)
4) circulation systems
5) dwellings
6) land use (intensity of incompatible uses)
7) amenities.

Identification includes both the extent and location of all environmentally deficient areas in the region and their relationship to developed
areas. The survey further quantified environmental deficiency for each county in terms of the total number of

1) deficient areas;
2) deficient acreage;
3) units of deficient housing.

The absence of active local support for a regional approach to housing has limited the H-GAC's ability to establish regional objectives and guidelines for directing how housing development should take place. Therefore, the H-GAC's approach to evaluation is focused on determining the compatibility of the project in the context of existing conditions and projected urban growth. The Phase I Comprehensive Plan coupled with the Housing Deficiency Model provide the basis for their evaluation. The emphasis of this approach is on insuring the environmental quality of housing. The following describes the H-GAC review process and the criteria included in its evaluation analysis.

Preliminary housing project applications are sent to the H-GAC by the FHA and the Local Housing Authority (in the case of public housing). Once the applications are received and forwarded to the appropriate reviewing staff members, the review process is begun and must be completed within fifteen (15) days. It is during this fifteen-day period that the H-GAC must make the applicant aware of any problems or
conflicts which it has recognized and attempt to negotiate with the developer to make changes which might correct these deficiencies.

During the review period the reviewer evaluates the project from two aspects: (See Appendix IV)

1) Environmental Assessment
2) Environmental Impact

The Environmental Assessment is divided into three areas of assessment:

1) Physical Facilities
2) Service Facilities
3) Neighborhood Facilities

After locating the project on a "master status map," the reviewing staff member begins identifying all agencies, municipal authorities and jurisdictions which would be affected by the project. These authorities are then notified for comment. Essentially two questions are asked of these authorities:

1) Are you aware of the project?
2) Has it been reviewed by you and are there any comments?

The list of those who normally would be consulted includes:

1) City
2) School District
3) Water Control Improvement Districts
4) County Planning or Engineering Office
5) Flood Control Engineer
6) Others

The comments from these authorities assist in the completing of the "Environmental Assessment."

The first element of the Environmental Assessment, the Physical Facilities Analysis, determines if there are adequate water and sewer facilities in the area to accommodate the new project. If there is a deficiency, an attempt is made to determine when adequate service might be provided.

The Service Facility Analysis is concerned with adequacy of fire protection, schools, parks, and green belts in the project area. For schools the analysis attempts to determine

1) the ability of existing schools to service projected population increase;
2) the proposed new schools planned for the area and the anticipated completion.

The evaluation of parks is based on in-house maps prepared under HUD work program for 1971. The reviewer checks the location of existing parks and proximity to any future parks as proposed by area "701" Plan. For Greenbelts, the project is checked to determine if it falls within
a proposed greenbelt as designated by the new (1971) park maps.

For the Neighborhood Facility Analysis, the reviewer makes a personal visit to the site. Here the reviewer is attempting to evaluate streets, drainage characteristics, site and compatibility with existing neighborhoods. The streets are reviewed for accessibility, adequacy for additional traffic loading, and needs for improvement, if any. For reviewing drainage characteristics, the site inspection is augmented by contacting the county engineer to determine if the developer's drainage plans are consistent with the county plan. The site inspection also evaluates the proposed use of the site in the context of the immediate surrounding uses and determines the ability of surrounding neighborhood facilities (grocery stores, restaurants, etc.) to serve adequately the needs of the proposed project. In assessing the compatibility of the proposed project, the reviewer attempts to ascertain if the "proposed use is a high-friction intrusion that will detrimentally affect the immediate surrounding area."  

For analyzing the Environment Impact of the project, the reviewer evaluates the applicant's responses to the preliminary environmental clearance worksheet. This worksheet is composed of a series of questions concerning the nature of the project's physical and social impact on the community. The reviewer makes direct responses and analyses
of the applicant's statements.

After completing the analysis of the Environmental Assessment and Environmental Impact, the reviewing committee states specific findings to the Executive Committee. The Committee then formulates its positions and incorporates them into the final review statements of the transmittal letter. The transmittal letter is then returned to the FHA office, where the final decision concerning the project is made.

The FHA evaluation concerns itself primarily with the "economic feasibility" of the project and the immediate environmental aspects of the site. For this reason they have indicated that they look to H-GAC evaluation for determining the broader regional environmental aspects of the projects. There are indeed cases which have received negative recommendations by the Council which ultimately were rejected by FHA.

"Often the case is that if the project receives negative comments from the Council, we (FHA reviewing staff) place "conditions" on the application which must be complied with before we will accept the project for funding. . . ." In either case, it can be concluded that the possibility of having an application rejected because of a negative council comment provides an incentive for the developer to expand the scope of concerns in his project application in order to comply with those of the Council.
Once the H-GAC receives a housing application, it concentrates on guiding the developer's decisions by making him aware of a full range of environmental concerns, as previously described. In so doing, the attempt is to induce the developer to improve the environmental quality of the actual subdivision itself as well as to insure the project's compatibility with surrounding environmental conditions.

Discussions with various developers and individuals, either involved in or affected by the review process, revealed that there exists some conflict in opinion as to what the Council's role as a planning agency should be. There was unanimous agreement that some form of regional planning should be conducted for the purpose of coordinating urban growth. The disagreement arose over the nature of the H-GAC's coordinating efforts on a functional basis. Should coordination consist of providing the developer with information or alternatives which he may or may not utilize in making his decisions or should the Council adopt plans for how the region should develop and have the authority to coordinate and direct development accordingly? The following responses are representative of these extremes:

... H-GAC could provide information concerning the entire area which could be useful to developers, but I don't think they (H-GAC) should be given responsibility for deciding where development should take place. ... They should respond to the market. ...

We already have enough planning agencies who are telling us what
is happening and what is going to happen if the city is left to its own resources. What is needed is for Regional Councils to make decisions as to how development should take place and have the authority to intervene in the natural development processes. Otherwise, what are they needed for?8

At one level comprehensive planning was seen as being a tool for "describing what is happening in the entire region." Here plans would provide information which could help the developer make decisions. The major contribution of Councils in this instance is their capacity to serve as an "information center" for compiling and distributing information. The weight of importance given to this aspect of the Council's role was almost unanimous.

The other quotation insists that Regional Councils must stretch the present authorities and move toward implementation of plans. Without active local support for a regional approach to housing, the implementation of housing plans is seen as being beyond the Council's capabilities. The incentive for the developer to negotiate conflicts in the project proposal which have been indicated by the H-GAC is, of course, the fear that the project may receive negative comments from the Council. It became apparent during the interviewing that some confusion exists concerning the actual influence of H-GAC comments on whether or not an application is approved. Many felt that the H-GAC actually had veto power in reviewing a project. Others felt that in effect a negative
comment by the H-GAC could result in a rejection of the application by the federal reviewing agency. These attitudes are indicative of the kinds of importance which is generally attached to the Council's recommendations.

H-GAC's Fact Sheet describes the "weight" that should be attached to their recommendations:

these comments - positive, negative, or qualified - tend to enhance or deter the prospects of funding by the appropriate State and Federal agencies. However, the H-GAC support of a proposal does not automatically assure the ultimate funding; but the review process is tantamount to the application's even being considered by the funding agency.

Clearly it can be seen that the Council has no authority for directly affecting the developer's decisions. At present, the H-GAC review process serves only as a negative factor in influencing the development of housing within the region. Negative in the sense that because the comprehensive plans do not set forth objectives and guidelines for how the housing development should take place, there exist no criteria on which to base evaluation that would have a positive effect in directing development. Further, unless local support can be generated for adopting regional housing objectives and guidelines, the Council is powerless to change the nature of its review process. Why? Because ultimately the Council must depend on the support of its local member governments and federal funding agencies to implement its plans and policies.
Without this active local support, the Council must rely on its ability to serve as a regional informational center in order to have a positive influence on directing housing within the region. By providing this service the Council can indirectly affect the developer's decisions by making him aware of investment potential in federally assisted housing. The extent to which this will be the case will depend upon the communication links the H-GAC can establish with developers in the area and the kinds and sophistication of data which it can provide. At present, efforts are being made by the Council in both of these areas. One such effort is represented by the development of an Environmental Decision Assistance System. One part of this System, the Regional Simulation and Systems Control Model, will be discussed further in a later section.
The Miami Valley Regional Planning Commission (MVRPC) was created in 1964 and has thirty member municipalities, as well as the five member counties. There are forty commissioners, thirty-seven of whom are elected officials, with each municipality having one representative and each county having two representatives.

The Miami Valley Region, in southwest Ohio, has a total population of just under 900,000. Three counties are predominantly rural in character, while the Dayton metropolitan area is contained within the other two largely urbanized counties. Dayton City has a population of 243,000, or a little more than one-quarter of the region's people. About 11% of the area's total population is Black, and most of these people live in a concentrated area of Dayton's West Side. Blacks make up more than 30% of the Dayton City population.

Since the early months of 1969 the staff of the MVRPC has been engaged in carrying out a regional "Housing Dispersal Plan" or as it is commonly known, the "Dayton Plan." The plan calls for the balanced distribution of some 14,000 additional units of low and moderate income housing, including a considerable amount of public housing, over the next four years throughout the five-county Dayton, Ohio metropolitan region. The
crucial factor in the MVRPC's approach is the support the Commission was able to generate in favor of a regional housing plan. This support by member governments and federal funding agencies was essential to the adoption of the plan and its ultimate implementation.

Essentially the plan is based on computing by county, low and moderate income housing needs and allocating shares of this housing to planning units throughout the region, each of which is based on groupings of municipalities and/or townships within a county. Location of such housing is coordinated through voluntary agreements and working relationship with the MVRPC and through the A-95 review process. Important here is the fact that the MVRPC approach sets objectives and guidelines for how housing should take place. In so doing they are attempting to have a positive influence on the production and locational distribution, as well as, on the environmental quality of housing within the region. In this instance, the review process can be seen as having a positive influence in the sense that project evaluation is made in the context of a comprehensive plan which establishes criteria for directing how housing development should take place. The following discussion will focus on the nature of this plan and the efforts to implement this plan.

There are two overriding goals which form the basis of the MVRPC
housing program. They are:

1) to adequately house all of the Region's people;
2) to create and/or maintain sound, viable neighborhoods in the process of housing people.

An analysis of the local housing situation in the Region indicated that in order to accomplish these goals, two more goals must be achieved:

3) to increase the supply of housing units numerically, especially for low and moderate income families and individuals;
4) to expand the range of housing opportunities for everyone geographically.

With these goals in mind to direct their efforts, the MVRPC began the process of identifying the full range of objectives within each of the goal areas. Each of the objectives would necessarily have to be achieved before realizing the larger goals. The regional housing plan is itself one of these objectives.

The purposes of the Plan are:

1) to provide a public report summarizing the estimated extent and character of the housing needs in the Miami Valley Region on a county basis;

2) to outline the ways in which these needs can be translated into reasonable and achievable goals for the subareas of the Region;
3) to provide numerical guidelines for geographically distributing the needed housing units throughout the Region;

4) to provide policies and recommendations for taking the actions necessary to implement the suggested pattern of housing distribution.  

The methodology for formulating the Plan began with the identification of the present housing needs within the five-county Region. Housing need was quantified on a need vs. supply technique. The approach taken by the MVRPC in evaluating housing need entailed:

1) examining the extent and condition of dwelling unit supply;

2) deriving the gross dwelling unit need.

In deriving need, the distinction was made between housing need and housing demand. Housing need was defined "without primary consideration to the economics of the situation" or the "insatiable desire", and "the ability to pay" characterized effective demand. Need was considered to be primarily a social concept while demand was an economic concept.

The Housing Plan deals with the issue of need rather than demand.

The results of this analysis show that in 1970, the five-county region was suffering a deficit of - and therefore needed- about 16,000 additional housing units. Of these, more than 14,000 were estimated to be needed for the low-moderate income market.

The figures derived did not take into account all of the dwelling units in need of rehabilitation; it dealt only with new units required to
eliminate delapidation and overcrowding and provide a "comfortable vacancy rate."
Once determined, the need figures were broken down by county in order to make the individual counties aware of their own needs.

For the purpose of geographic distribution a matrix was devised upon which the distribution was imposed. The matrix divided the entire five-county Region into fifty-three "planning areas" or sub-areas to which the housing units could be assigned. (See Figure 2) The size of the planning units is based, to a large extent, upon the intensity of development within them. Thus, in the metropolitan area, planning units often consist of individual townships; whereas, in less densely populated areas, groups of townships have been put together to form large areas of counties. Dayton City consists of twenty-one planning units composed of groups of census tracts.

With the housing need figures established, a geography matrix designed, and other pertinent data compiled, the needed low and moderate income units were assigned to the planning units. The mathematical method used for assigning the housing units was the result of six calculations:
1) equal share
2) proportionate share of the county's households
3) proportionate share of the county's households making less than
MVRPC Housing Dispersal Plan by Planning Units

Total units, about 14,000

Figure 2
$10,000 annually (or less than $7,000 in the three more rural counties)

4) the inverse of #3

5) a share based on the assessed valuation per pupil of the school districts covering the planning units

6) a share based on the relative overcrowding of the school districts involved.¹⁵

In its analysis of pertinent factors and ways of combining them, the MVRPC staff considered three elements:

1) Population: Included here were such things as the number of people, number of households, household income distribution, number of persons over age 65 and number of welfare cases in each planning unit.

2) Housing: Included here were the number of dwelling units by type, age, condition of housing in each planning unit, percentage of home ownership, average value, and number of building permits issued during the last several years.

3) Facilities: Included here is the availability of sewers and water, transportation, shopping facilities, recreation areas, schools and proximity to employment and job centers.

Important here is the fact that this evaluation process resulted in hard figures for housing unit distribution.
As mentioned earlier the degree of success in implementing the MVRPC Housing Plan is dependent on the voluntary agreements and cooperation of those involved in housing production and on the understanding of the region's residents. For this reason the emphasis is placed on community involvement throughout the development of the housing program.

Community involvement is distinguished into five categories:

1) public agencies and key organizational interests;
2) business community;
3) public officials;
4) citizens groups;
5) housing producers.¹⁶

In the initial stages the involvement of public agencies was achieved through the organization of a housing advisory group. This group was represented by such agencies as the Human Relations Committee, the Dayton City Planning Board, the CAP Agency, the Model Cities Program, the League of Women Voters, the Home Builders Association, local realtors and mortgage bankers and financial institutions. The role was one of meeting regularly to review staff work. The meetings served as a forum for informational exchange concerning the housing problems encountered by the various groups.

The business community was involved through the formation of a
breakfast group. The group included key businessmen in the community. Their role was one of isolating the obstacles "to housing production and to identify and activate resources in the community." This group also served in neutralizing opposition as it was forming. The involvement of public officials was accomplished through their membership in the MVRPC and "through staff efforts to establish open lines of communication and liaison with councilmen, commissioners, trustees and administrators." Public officials served both as policy makers of the MVRPC and guided the direction of the housing program. Public officials further assisted by sponsoring public meetings, responding to inquiries from citizens, and providing feedback to staff. During implementation of the Plan, public officials continued to serve by reviewing and taking action on proposals.

Involvement with citizen groups was achieved by staff members participating in organizations concerned with housing, taking part in forum discussions on housing, serving on panels, by being available to provide interested organizations with information. Citizens groups assisted the MVRPC by organizing public meetings and providing forums for discussion and presentation of the Plan. They also provided verbal and written support of the Plan.

Housing producers were involved through the business group mentioned
earlier and by making available the needed technical information and assistance and by staff efforts to encourage the production of lower income housing. The contribution made by the housing producers was to build more housing. Also, they assisted "by answering citizen inquiries, by providing data on projects that already existed and declaring their intentions to build quality developments with sound management." 

In September 1970, the Dayton Plan was adopted by the Commission. Its adoption and subsequent implementation have been considered to be largely the result of the early efforts to involve the community in the Plan's development. The actual implementation of the Plan is further dependent upon the A-95 review process.

In a publication entitled A Working Paper - the A-95 Review Process for Housing and Its Relationship to the MVRPC Housing Plan (6/7/71), the MVRPC explores some of the limitations and shortcomings of both the A-95 process and the Housing Plan itself. In regards to the A-95 process, it was felt that the "details" must be determined. In respect to the Housing Plan, a more detailed policy level must be reached in order to provide guidelines necessary to accomplish housing goals. These policies are seen as "necessary in order for the review process to function."
The MVRPC Report outlines what it considers to be three limitations contained in the A-95 OMB memorandum. They are:

1) Only those single family FHA (or public housing) developments of 50 units or more and only those multi-family developments of 100 units or more are required to come to the clearinghouse for review.

2) Review is officially limited to one point in time - at the point of application for feasibility from FHA.

3) Review time is officially limited to fifteen days; apparently this is to commence on the date when FHA officially forwards the proposal to MVRPC.

Ideally, the staff of the MVRPC would like to review all proposals (those listed in A-95), regardless of size. It further would like to have the review occur at three points: first, at the idea stage; second, at the feasibility stage; and third, at the final (or firm commitment) stage when all plans have been finalized.

Informally, the MVRPC is attempting to reach agreements which will allow them to practice these functions as described above. An agreement has been reached with the Cincinnati FHA office to direct all project proposals under applicable programs to the MVRPC, regardless of size. Further, the FHA office has agreed to recommend
strongly that the developer contact the Commission during the "idea" stage, so that a working relationship can be established that will continue through feasibility and completion stages of development. Also, the FHA office has indicated a willingness to be somewhat flexible on the fifteen-day time limit, when at all possible. Both the formal and informal agreements reached between the MVRPC and the FHA office are seen as being crucial to the implementation of the Housing Plan.

In regards to the Housing Plan itself, the MVRPC is in the process of developing additional and more detailed policies for improving its effectiveness. Some of the limitations or shortcomings of the Plan were recognized in the MVRPC Report mentioned earlier and are discussed below.

Eight months after the adoption of the Housing Plan, the results in terms of actual housing units built, under construction and proposed were apparent. Three of the planning units within the region were nearing their assigned number of dwelling units, if all those completed, under construction and proposed were counted. This lead to the question "how best to handle two numerical aspects of the quota system."21

First, how can activity be slowed down or stopped in a Planning Unit that is reaching its quota of units? The answer to this was seen to be in having the MVRPC to monitor all the proposed development within
the area, with the Housing Plan serving as one criterion. If the proposal causes an area to exceed its assigned quota, a negative review can be given to it by the MVRPC. The effectiveness of this approach remains to be seen. It is highly conceivable that there will be objections from both FHA, who wants to insure more mortgages, and the developers, who want to build low income housing wherever they can obtain land for a price that will make a project feasible.

The second aspect of the quota system being examined by the MVRPC is that of the "composition of the assigned units in terms of program type." The assignments made by the MVRPC for distributing housing made no recommendations as to whether an area's quota shall be made entirely of 235 home ownership single-family homes, for example, or entirely of public housing, or of a number of different program types, etc. The result has been that some units are only accepting certain types of units to fill their quotas. To avoid this situation would require further breakdown of the existing quotas. The accomplishment of this would require further agreements.

Another area of concern for the MVRPC is the "scatteration" dimension of the Housing Plan, i.e., the way in which the low and moderate income housing units are located. The Plan, by its very nature, deals with "scatteration" at the county and at the regional levels. It does not
recommend what kind of locational criteria should be used within planning units. The question arises as to whether the planning units' quotas should all be located in one place, or if it should be scattered throughout the villages, municipalities and unincorporated areas of the planning unit. A case of significance regarding this issue involved the Smokler Development Company of Detroit and the citizens of Vandalia. The Smokler Development Company proposed to build 564 units of moderate income dwellings in one concentration in Vandalia. The MVRPC staff endorsed the proposal because (1) it had well planned amenities; (2) it was a co-op and hence a form of house ownership; and (3) it was to be phased over a fifty-year period.

A citizen's group from Vandalia filed suit against the development company claiming that because of the concentration of moderate income units found in the development, it was contrary to the intent of the MVRPC Housing Plan. In an out-of-court settlement, the Smokler Company was instructed "to build no more than 275 dwelling units under the 236 Program, and the balance as marked rate units." The agreement reached states that the balance so achieved was sought in order to comply with the MVRPC "scatteration" plan. The MVRPC staff considers this to be strong support for a policy of "scatteration" within each planning unit, as well as among planning units of each county. A
policy of this kind, coupled with another concerning a mix of program types in each planning unit, is thought to be needed by the MVRPC in order to facilitate the realization of the Plan goals.

The MVRPC approach to achieving its housing goals for the region represents an attempt to:

1) affect the environmental compatibility of the project;
2) increase the production of low and moderate income housing;
3) influence the distribution of low and moderate income housing.

Projects are evaluated on the basis of guidelines and criteria established in its policy statement and in the Regional Housing Plan. (See Appendix V) The policies and Plan do serve as a tool allowing the Council to have a positive effect on the housing development process because they provide a definitive/quantitative framework for how development should take place. However, the implementation of the Plan is dependent on the acceptance and agreements reached with those involved in the actual approval of plans and allocation of federal funds.

230 INFORMATION COMPILATION AND PROMULGATION

231 Determination of Existing Regional Housing Needs

One of the primary roles which Regional Housing Councils can perform in affecting the development of housing is that of a regional information
center. Because of their areawide orientations, Councils serving as
information gatherers and disseminators could effectively determine
housing needs within an area. In so doing, Councils could inform
builders and developers of housing strategies and opportunities for
housing investment and production, thus having a positive influence on
the development of housing by indirectly affecting the developer's
decision making processes.

In establishing need two approaches can be taken; need can be based
on the existing situation or the projected situation. The orientation
of the two informational systems which will be examined in this sec-
tion will correspond to this delineation.

The first informational system provides a method for determining the
existing need. The method described here is actually a part of a study
which was recently conducted by the Institute of Urban Studies at the
University of Houston. The purpose of this study is to develop a pro-
cess for accomplishing "market aggregation." The market aggregation
process, as described in the IUS publication *Housing Market Aggregation-
A Handbook for Regional Councils*, is divided into three functional roles
which could be performed by Regional Councils. They are as follows:
1) the identification of housing resources in the region;
2) the statistical enumeration of housing demand;
3) the promotion of contractual arrangements for mass housing production.24

The combination of the first two functions result in the determination of existing housing needs. Also, they provide the basis for acquiring the knowledge necessary to perform the third role. In the last function lies the essence of market aggregation - "bringing together in a contractual agreement all the housing actors -- buyers, sellers, real estate agents, builders, architects and financiers -- required to build a large number of units in a short time."25 In this capacity Councils actually are in the housing producing business. However, at present the Regional Councils are not in a position to assume this ultimate role as a "packager" of large-scale housing construction agreements. Financial constraints and lack of legislative authority prevent such activities. However, there are indications that this role may be changing. The nature of these indications and their effects on the future role of Regional Councils will be dealt with in Part III of this study. The first two functions, on the other hand, are realistic functions which Councils could immediately incorporate into their programs. For this reason, these two functions are presented here.

Before examining the information which these functions will generate, it is necessary to define "housing demand" as used in the project. The
project distinguishes between potential and effective demand. **Potential demand** is best represented by the poor family living in a substandard house in a deteriorating neighborhood. "The family is overcrowded, uncomfortable and possibly unsafe from structural defects and unsanitary conditions. By any definition, this family is in desperate need of a better housing unit." This family represents a unit of potential demand.

In order for this family to represent a unit of effective demand, it must be "capable on its own of handling the financial burden of improved housing conditions." The fact is that very few families in this situation have that capacity. However, through federal housing subsidies, many families' housing needs can be translated into effective demand. The approach described here addresses itself to effective demand.

One more distinction is made in the Handbook concerning housing demand. This distinction involves the separation of housing demand into institutional and non-institutional classifications. "Institutional demand for housing emanates from a single source. The number of housing units involves many ranges from a few to as many as several thousand." Examples of institutional housing demanders are:

1) A local Housing Authority for units of public housing;
2) Educational institutions such as colleges and universities for
dormitory units or married student apartments;

3) Sponsors, either non-profit or limited dividend, Section 236 interest subsidized multi-family units;

4) Sponsors of several Section 235 single-family rehabilitation units;

5) Builder-developers for units in excess of their own production capacities;

6) Urban Renewal Agencies, both for new projects and relocation activities;

7) Highway Departments for relocation activities;

8) Community Development or Metropolitan Housing Corporations.\(^{29}\)

In all the above cases the institutional demander deals directly with the producer. "In no case is the institutional demander the recipient of the housing unit for living purposes. He is the middle man who makes the unit available to actual users through sale or lease with or without the bid of Federal subsidy.\(^{30}\)

The non-institutional demand, on the other hand, is that portion of the housing demand not generated on an institutional basis. Primarily it consists of family-by-family demand for housing "of the variety ineligible for federal subsidy plus any demand eligible for federal subsidy but not falling under the auspices of sponsorship or agency activity.\(^{31}\) The relationship between effective and institutional demand is that
virtually all institutional housing demand represents effective demand.

The emphasis of resource identification is to generate information which will assist in the production of housing. Because of this, it focuses on the determination of institutional demand. In this role, the Regional Council serves as an identifier of housing resources within the region and as an information center through which data on the needs of demanders and capabilities of suppliers can be funnelled.

Specifically the Council's role in resource identification would include:

a) determining periodically the needs of institutional demanders in the area;

b) determining periodically the identity of suppliers (builders, architects, real estate agents and financiers) interested in meeting institutional demand in the region;

c) serving as a flow-through for housing information which will facilitate better communication between the institutional demanders and interested suppliers;

d) attempting to develop an increasingly intimate knowledge of and presence in the regional housing market.  

Clearly it can be seen that this is an ongoing service which must be continually updated and reviewed.

The systematic methodology for gathering and promulgating information
consists of a series of questionnaires and form letters to be sent by the Regional Council to all actors in the housing market in the region.

The specific list of actors to be surveyed would include:

1) Housing Authorities
2) 235 and 236 Sponsors
3) Educational Institutions
4) Builder-Developers
5) Urban Renewal Agencies
6) Highway Department
7) Community Action Agencies
8) Metropolitan Housing Corporation
9) Board of Realtors
9a) Individual Realtors
10) Homebuilders Association
10a) Individual Homebuilders
11) Apartment Association
11a) Individual Apartment Builders
12) Mortgage Bankers Association
12a) Individual Mortgage Bankers
13) Institute of Architects
13a) Individual Architects

Responses to the questionnaire provided will present the Council with two basic types of information:

1) specific projects being contemplated by institutional demanders for housing;

2) names of suppliers interested in contracting for production of housing units required to meet institutional demand.

With respect to #1, the Regional Council will have details on each project including number and style of units, desired price range, land required, construction bid deadlines, etc. Concerning #2, the supply side, the questionnaire system will give the Regional Council the
identity of builders, real estate agents, architects and financiers who have expressed an interest in meeting institutional demand. The fundamental role of the Regional Council as housing resource identifier and "fledgling market aggregator" is to pass on the specifics of housing needs generated by various institutions to suppliers capable of meeting those needs. 34

An example presented in the Handbook further describes the role of the Regional Council as a housing resource identifier. Suppose that the Regional Council learns through a response to a questionnaire that a particular religious organization is interested in sponsoring a Section 236 apartment complex. The sponsor's response to the questionnaire not only indicates the interest, but also details the sponsor's level of expertise and involvement. If the project has already passed the planning stages and awaits only selection of a builder, then the job of the Regional Council is to send the project specifics to those builders whose questionnaire responses indicate an interest in contracting for construction of subsidized units of the multi-family variety. The Regional Council would also provide the sponsor with the list of potential builders who had been informed. Further contact between the sponsor and potential builders would be left to their discretion, although the Regional Council could play a further role if the sponsor encountered difficulty in obtaining bids for the project. 35
The second service which could be performed by Regional Councils is the statistical enumeration of the demand for improved housing. This service would address itself to the identification of housing need within the region. It is recognized in the Handbook that much of the housing need caused by poor quality simply cannot be met through satisfaction of institutional demand. "Non-institutional demand must be met by proper quantitative recognition of the need, commitment of federal subsidy funds to transform the need into effective demands, and finally, construction of units through either conventional or industrialized methods." The role of Regional Councils would be to establish the housing needs including the numbers of families desiring to change living quarters. This information would be established in each planning region in the State. HUD could utilize these statistics to assist in determining how it will commit its subsidy program funds. "Once funds are committed, the pent-up demand for low and moderate income housing becomes effective and the producer faces a relatively 'sure thing' firm order market." The value of the service to the housing producer is apparent and the Regional Council will have secured its role as an essential element in the housing production process.

A measurement technique for establishing housing need was developed by the Texas Department of Community Affairs. This technique, known as the Texas Survey Method, includes:
1) Sampling

2) External Evaluations

3) Occupant Interviews

4) Interviews

Sampling involves the selection of specific housing units to be evaluated and the determination of the total number of units in the region to be evaluated. One problem which has been long associated with determining housing need has been that of developing a reliable method of defining the quality of a house. To combat the problem of subjective evaluations, the Texas Survey Method introduces a pictorial scale. The purpose of the pictures is to allow the surveyor to "judge various parts of the housing unit in comparison with a set of reference pictures. Since all surveyors must use the same set of reference pictures, the objectivity of the observations is greatly enhanced."\(^{37}\)

The purpose of the occupant interviews is to determine effective demand. It is recognized that the physical condition of a house is not related to the attitudes, characteristics and abilities of the persons occupying the unit. The interview is an attempt to determine if indeed the occupant does desire to move or to improve his dwelling. In this way, the results of the "attitudinal survey" can establish an effective demand figure.

The Handbook designates the Texas Department of Community Affairs
with the responsibility of interpreting the data gathered from the surveys.

The prime product of both resource identification and statistical enumeration is information. Even though this type of information represents an invaluable contribution, the Regional Council is not in a position at this point to determine whether or not the end result of its efforts is housing production. Providing this service would however establish Regional Councils as an informational base serving as a catalyst for housing production.

232 Determination of Projected Regional Housing Needs

The informational system to be examined here provides a method for determining the projected housing needs. The system is formally termed as a prototype of a Regional System Simulation and Control Model which is being developed for use by the Houston-Galveston Area Council as part of their efforts to develop an Environmental Decision Assistance System. (See Figure 3) Working with census information and prescribed variables, the Model enables the H-GAC to forecast with a degree of accuracy where certain kinds of need will develop within the region.

In December 1971, the Houston-Galveston Area Council contracted with Applied Decisions Systems (ADS) to develop a computer model which
ENVIRONMENTAL DECISION ASSISTANCE SYSTEM

PLANNING, DEVELOPMENT, MANAGEMENT & PROGRAMS, OPERATIONS & UP-DATING

Figure 3
would serve as the prototype for a full-scale forecasting model. This prototype was to be a Housing Demand Model whose purpose would be to determine accurately "the trends in housing availability, construction, and demand in the thirteen-county region, coupled with further capability of reliably projecting other salient characteristics of the region over the next decade." If the "Housing Demand Model" proves successful, it will be expanded to form a full-scale "model" of the region.

The types of information which could be generated by the Housing Model would involve predictions such as, "how many of 36 kinds of people in 27 kinds of households will be in what 12 kinds of jobs and living in 6 kinds of housing units within each individual neighborhood within the region over the next year or the next 10 years." The prototype model is an outgrowth of research and development performed by Professor David Birch, of the Harvard Business School and the staff of Applied Decisions Systems. The starting point for the prototype model was the New Haven, Connecticut SMSA forecasting model, developed by Professor Birch. Working with this model as the preliminary structure, it was then modified so that:

1) the information requirements of the Council could be satisfied;
2) the unique characteristics of the Houston-Galveston Region could be captured.
Essentially the prototype model is a numerical representation of the behavior of the key actors in the census tracts which were selected for study.

These actors include heads of households, family members, workers, employers and builders. The methods by which the actors make decisions, and the interactions among all the actors, have been modelled. Each actor is involved in a process which includes living somewhere, looking for and finding a house, aging, migrating, working (and commuting to and from a job), constructing housing units, and starting, expanding, or contracting business. Working with these kinds of considerations represents a behavioral approach to modelling versus the traditional statistical approaches. It is thought by the developers of the prototype model that the behavioral approach has certain advantages over the statistical approach. These advantages center around the fact that traditional forecasting models rely upon "statistical correlations among variables which describe a region." For this reason, it is difficult for the users of these models to understand the reasons for, and the meaning of the forecast. On the other hand, behavioral models are thought to be more easily understood because they rely upon the determination of the actual factors which people or institutions would consider before they make decisions (e.g., to change residence, expand a business, build a house, etc.). Herein lies the basic concept of the behavioral model: "all decisions and actions occur for a reason, and good forecasting
depends as much upon understanding the reason as upon observing the action.\textsuperscript{43}

It is the intent of the prototype model to keep track of all the actors and their decisions by census tracts. "The 'flow' of people and transactions among the tracts, and between the tracts and the 'outside world' are also modelled. The model simulates the interactions year-by-year for a ten-year forecasting period. Each year's experience becomes a starting point for the next year."\textsuperscript{44}

In developing the prototype model, one of the primary purposes as stated in the project was to help determine what kinds of forecast data are of greatest interest to a user in the Houston-Galveston Region. An example of the structure and type of information which can be generated by the prototype model are illustrated in Figure 4. (See Figure 4)

The prototype model makes use of two types of data. These types are referred to in the report as "state variables" and "coefficients."

State variables are those data elements which describe the people, jobs, housing stock, and geographic characteristics of the area being modelled. These variables used in the prototype model were collected by ADS with the assistance of the H-GAC staff. The information selected for analysis included census data for 1960 and 1970 in the following areas:\textsuperscript{45}
MAJOR ROUTINES IN THE PROTOTYPE MODEL

Figure 4

NAME

FUNCTION(S)

MAIN
Reads in the initial conditions and parameters, sets up the timing sequence, calls the major functional routines, and handles some of the interactive communications with the user regarding whether or not to run again, and if so, under what circumstances.

SWITCH
Interrogates the user to determine which, if any, conditions or parameters should be changed for the up-coming run. This can be done in a bulk-input mode for the expert or in a very chatty dialogue for the inexperienced user.

VITAL
Computes the basic shifts that take place within the population as a result of births, deaths, marriage, aging, and assimilation from one ethnic and/or educational group into another.

JOB-EXEC
JOB EXEC is an independent routine that parcels out the task of computing the shifts in employment that take place within the region.

JOB-MACRO
A crude macro model of the U.S. economy that computes the Gross National Product, sector by sector, and keeps track of productivity, value added by industry, inflation, the interest rate, and unemployment.

JOB-REGION
Computes the response of employment in the region as a whole to shifts in the national economy.

JOB-MICRO
Keeps detailed track of employment in each of 3 industries by size of industry for each of the districts within the region. Starting from known conditions, it computes the probability that each business in each district will: (1) expand, (2) contract, (3) move, (4) find itself facing a new competitor who has moved into the district, and (5) find that one of its competitors has gone into bankruptcy. It then sums the result of all the micro-activity to obtain the level of employment by industry in each district, and knowing the population, estimates of unemployment.

MIGRATION
Computes the migration into and out of the region by type of person. Determines the first residential choice of each immigrant and ascertains the tract from which each out-migrant left.

MOVER
Determines: (1) the odds that each person of each type in each tract will in fact move during the present year, and (2) the most probable tract in which each family will locate, assuming, for the minute, that there are vacancies of the proper sort to move into.

CLEAR
If any routine is the heart of the model, it is CLEAR. CLEAR examines the residential preferences of all movers, in-migrants, and new households by type of household, type of housing unit desired, and location, and “decides” given the vacancies available, who will get to move into which tract. Much of the power of the model derives from the efficiency with which clear solves this very complex problem.

HOUSE
HOUSE simulates the details of the housing market within each tract. It conducts the negotiations between renters and landlords, and ultimately decides who gets to live in exactly what kind of housing unit. In the process, it raises rents and prices when demand is excessive and lowers them when demand falls off. Automatic adjustments are made for inflation.

BUILDER
BUILDER performs the functions of the building industry. It looks at the unsatisfied demand by tract and type of housing (calculated in CLEAR), the shifts in employment and population, and the level of vacancies, and decides how many housing units of which type to construct in each tract.

POPULATION
Much of the accounting within the model is done on the basis of households. Of equal or greater interest to some users, and, in fact, to some routines within the model, is the distribution of population by type and tract. POPULATION makes the conversion from households to people.

REPORT
The user has the option of obtaining several summary reports, which he may specify one at a time, for any individual tract or for the total region. REPORT produces these standard reports.
POPULATION

Number of people
Median family income
Number, age, and occupation category of household needs.

HOUSING

Number of units
Number of occupied rented/owned units
Number of vacant units for rent or purchase
Price categories for all units

JOBS

Number of jobs in manufacturing, service, agriculture and mining
Number of manufacturing establishments by size (i.e., by the number of employees)
Skill level of jobs by industry

AREA

Size of each of the six census tracts selected for analysis
Travel time from each of the census tracts to the other tracts

The "coefficients" influence the way in which the above variables will change over time. These coefficients are the result of research into the "behavior of people and builders, industrial growth and change, mobility patterns, stages of neighborhood development, housing preferences, and so on." Because of circumstances which in many instances were clearly unique to the Houston-Galveston Region, some of these coefficients were modified.

The full-scale model, which will be similar to the prototype model in "logical structure," is expected to provide greater accuracy in
simulating urban growth in the region. The full-scale model will make it possible for the Council "to satisfy requirements for immediate information in minimum time and also to fulfill standing (planned) requirements for reports at minimum cost." 

The development of the full-scale model will take place in two stages. Stage One will focus on the design, development, testing and validation of the model at the regional level. The objective of the first stage will be "to produce accurate ten-year forecasts for the thirteen-county Houston-Galveston Region as a whole, without dividing the region into smaller areas." 

The Second Stage will focus on the design, development, testing and validation at the small area (e.g., census tract) level. The objective here will be to produce accurate ten-year forecasts for each of approximately 150 small areas as well as for the total region. The Model would be in a continuous state of being updated by incorporating new regional data. Users (builders, real estate developers, lending institutions, public agencies, etc.) will have ready accessibility to such data, the most current information available concerning environmental/demographic parameters that would affect their projects. With this tool, users could test their plans for possible conflicts/deficiencies, etc. and could utilize the Model's responses to evaluate their projects.
Once the user has made certain developmental decisions, these will be added to the Model's data bank. Used in this way, the Model functions as a test-bed for checking out ideas at a minimum risk and cost. It creates a basis or incentive for communications between the Council and various interest groups which can occur at any and all stages in the decision making process. It is felt that this system will provide the region and the Area Council a new opportunity for understanding the directions of change and dynamism within the area.

240 CONCLUSIONS

The following conclusions concerning the role of Regional Planning Councils in affecting the development of federally assisted housing have been divided into three areas. The areas relate to a Council's:

A) Approach to planning;

B) Procedures for evaluating project applications;

C) Capacity for functioning as a "regional information center."

A. The approaches of the Regional Councils examined in Part II represent two different orientations to affecting the development of federally assisted housing - the basic difference lying in the nature of their planning functions. One is oriented toward determining the existing and projected natural development trends within the region
and attempting to insure the environmental quality of housing within this context. The other is oriented toward establishing a regional housing plan which defines objectives and guidelines for how housing should develop within the region. The decisive factor in determining the orientation which will be taken is the degree of local support and cooperation that the Regional Council can generate to endorse its planning efforts.

The orientation of the Council's plans determines whether its review process has a negative or positive influence in directing the development of housing. If the plans on which evaluation is based do not set criteria for directing how development should take place, then the review process can only be seen as being a negative factor in influencing the development of housing. On the other hand, if the plans do establish certain criteria for how development should take place, the review process becomes a positive factor in directing the development of housing. Regardless of which planning orientation is assumed by a Council, the implementation of its recommendations and in effect its plans is ultimately dependent upon the support or local member governments in the Council and the federal funding agencies.

Thus, at present it can be concluded that the two crucial factors in
determining a Council's ability to significantly affect the development of housing are:

1) the existence of a regional housing plan which defines objectives and guidelines for how federally assisted housing should develop in the area;

2) the active support and cooperation of local member governments and the FHA offices in adopting and implementing housing plans and policies.

B. The ability of Councils to evaluate proposed housing projects and to ultimately affect their development could be enhanced by revisions in the A-95 process as it specifically relates to housing. These would provide for:

1) federally assisted housing projects of all sizes to be subject to A-95 review;

2) communications between the developer and the Council to occur at three points: first, at the idea stage; second, at the feasibility stage; and third, at the final stage when all plans have been finalized;

3) the time allowances for reviewing a project to vary with the scale of the project being evaluated.

C. Regardless of a council's approach to planning and review, it has
a contribution to make as a "regional informational center"; this function in itself could justify a council's existence. Because of its areawide orientation and contact with both the public and private sectors, Councils are in a position to most effectively perform the service of information compilation and promulgation. By establishing housing need within a region, Councils could have a positive influence on directing housing development by making developers aware of investment potential. The Council's effectiveness in influencing the development of housing in this way will depend upon the extent and sophistication of information and technical assistance the Council can provide. The critical factor here will be the amount of federal, state and local financial support that can be provided for Councils to perform these functions.
PART III

NEW DIRECTIONS
The development of regional planning and review councils in the United States is an ongoing process. Their roles are constantly being redefined by State and Federal policies and by the individual Councils themselves. Previous sections have dealt with the origins of multijurisdictional planning and review agencies and their effects on one area of urban development - federally assisted housing. This section will deal with the future role which these agencies might play in the development of housing.

In their present state, clearinghouses can be thought of as a network of planning agencies serving the entire country as a liaison between federal spending on housing and public and private activity at the local level. As a liaison, Councils can serve effectively as information exchange centers, safeguarding against duplication and overlapping of efforts among local governments, while making authoritative decision makers within the region aware of the environmental impact or conflicts in proposed developments. In this capacity Councils perform a service which can be equally appreciated by local member governments as well as private developers.

Further, Councils may develop housing plans and policies on which to evaluate proposed housing projects. However, as seen earlier, the limited authority of Regional Councils prevents them from assuming an
assertive role as implementers of plans and policies. Councils are presently outside the political process in the sense that they lack statutory power usually associated with governmental units (taxing power, eminent domain, etc.) and that their members are not directly elected to the Council by the voting public. This lack of decision making authority necessitates that Regional Councils rely on the support and cooperation of local municipalities and governmental funding agencies in order to implement their plans.

Assuming that what is truly needed is an areawide approach to directing the development of housing within a region, then organizations should be created which can perform these functions and implement their own decisions. Where do Regional Councils fit into this scheme? As a system of areawide planners functioning across the entire country, they represent a resource which could be tapped in order for the public sector to enter directly into the decision making processes which affect the development of housing. It is apparent that if Regional Councils are to assume an assertive role as implementers, they will need the increased endorsement of the Federal government.

There is a trend within the present administration toward increasing the responsibilities of Regional Councils. This trend is evidenced in the President's commitment to revenue sharing which will designate
block grants on a state, areawide and local basis for distribution. Further, Secretary George Romney of the Department of Housing and Urban Development has actively endorsed a metropolitan-wide approach to housing. He has emphasized that there is "no question" that central city housing problems are going to have to be solved on a metropolitan-wide basis, and that he expects state and regional officials to realize their responsibilities. ¹

In addition, there are currently three housing bills before Congress which generally reflect this trend:

1) "Housing and Urban Development Act of 1972" (H. R. 9688) by Rep. Wright Patman;

2) "Housing Consolidation and Simplification Act of 1972" (S. 2049) by the Nixon Administration; and

3) "Community Development Assistance Act of 1972" (S. 2333) by Sen. John Sparkman.

Although these bills have politically diverse origins, they share the same emphasis in respect to approaching the problem of housing on an areawide basis. They begin to indicate a new role for Regional Councils in the housing development process as a distributor of federal funds. This study will examine one of these bills - H. R. 9688 - in terms of the effects it would have on the role of Regional Councils.
This review of H.R. 9688 will deal specifically with Title V of the Act entitled Housing Block Grants to State and Metropolitan Housing Agencies. The label of Title V suggests its relevance to this study and essentially its intent. Basically the purpose of the Title V is "to establish state and metropolitan housing agencies to develop balanced housing programs on an areawide basis."²

The guidelines set forth in Title V for designating "metropolitan housing agencies" are quite broad. It appears that any organization - local, metropolitan or regional - could be a successful candidate as long as it is recognized by both the Governor of the given State and HUD as being acceptable. However, to the greatest extent possible metropolitan housing agencies are encouraged to be representative of the elected officials of all of the units of general government within the metropolitan area. Existing Regional Councils with their geographic orientation, experience in planning and the representation of elected officials clearly appear to be the logical candidate for this task in many states.

In order to accomplish their purpose, metropolitan housing agencies will be involved in two tasks:
1) establishing the housing needs and objectives throughout the metropolitan area involved;

2) administering the programs outlined in Title V.

The determination of need will be based on four figures:

a) the Population of the metropolitan area (total resident population of the area);

b) the Amount of Poverty in the metropolitan area (number of persons whose income is below the poverty level);

c) the Amount of Overcrowding in the metropolitan area (the number of housing units with 1.01 or more persons per room);

d) the Amount of Deficiency in the metropolitan area (the number of housing units lacking some or all plumbing fixtures).

On the basis of the ratio comparing figures for a particular metropolitan area with those of the other metropolitan areas, the Secretary of HUD will allocate housing funds to the Metropolitan Housing Agency. The Housing Agency will then in turn distribute these funds within its area.

The Metropolitan Housing Agencies will also be in charge of administering three programs:

1) Special program grants;

2) Metropolitan incentive grants;

3) the allocation and distribution of housing subsidy funds.
Special program grants are to be made by the agency for (1) special programs and new approaches to housing low and moderate income families; (2) grants, loans, technical and other assistance to public and private organizations with respect to construction, rehabilitation and operation of housing for low and moderate income families; (3) studies, technical assistance and advisory services aimed at the elimination of unreasonable restraints on the provision of housing; and (4) studies, technical and financial assistance for programs designed to aggregate mass housing markets.

Metropolitan incentive grants are made by the agency, funded by HUD, to help localities defray the extra cost of infrastructure required to house low and moderate income families within reasonable proximity of work places. These grants are made to alleviate the problems which arise because the low and moderate income family moving into an area requires municipal services but does not add enough to the tax base to offset the increase in the total cost of services.

In order to be eligible to receive funds to carry out the task described above, the Metropolitan Housing Agency must submit for HUD's approval a three-year housing program. This housing program 1) establishes areawide housing needs and the need for supporting facilities;
2) establishes adequate and feasible objectives toward meeting those needs;
3) identifies the number and types of housing units to be assisted with federal subsidy funds;
4) identifies the income groups to be served and the general location of the housing units to be made available to each such group;
5) identifies other local actions and programs to be undertaken to encourage needed housing production and preservation of the existing housing stock.

This legislation is significant in that it is representative of a movement toward endowing regional planning and review councils with new power. The enactment of this bill would dramatically change the role of Regional Councils in the production of housing within the region. Regional Councils, serving as Metropolitan Housing Agencies, would receive federal block grants and would be responsible for the distribution of those funds for several housing purposes. Of particular importance here are the provisions made under special programs which permit the agency

... to provide grants, loans, technical and other assistance to public and private organizations with respect to construction, rehabilitation, and operation of housing for low and moderate income families. 3

With this the Council would actually be making construction and
rehabilitation loans and grants. Councils would move from planning/policy making functions to becoming implementers of housing plans.

Regional Councils would be able to establish guidelines and plans for where and how much federal assisted housing should be produced. Through its authority to allocate federal funds, it would be able to implement these plans and policies.

The opposition to Regional Councils assuming this position is readily apparent. Regional Councils are only indirectly exposed to the voting public through the elected officials appointed to serve on the Executive Board of the Council. The decisions of the group are thus seen as being only indirectly responsive to the public. If given the authority to distribute federal funds, the organization would become highly politicized. The question arises as to the extent of authority which can be placed in an organization of this nature whose members are not directly subjected to public scrutiny.

Further questions arise concerning the relationship between the Regional Planning Councils and the Federal Housing Authority. Under the provisions of H.R. 9688, Regional Councils would in effect absorb the functions now performed by the Federal Housing Authority. These functions would include processing applications, conducting "feasibility analyses," etc. Traditionally, FHA has been in the business of
promoting the production of housing; FHA's primary concern is evaluating the "economic feasibility" of a project. Regional Planning Councils on the other hand are primarily concerned with evaluating what in effect is the "environmental feasibility" of a proposed project. The possibility of one organization being able to perform effectively these two diverse functions without facing a conflict of priorities is highly inconceivable.

The above problems relate to the internal functional and organizational characteristics of Regional Planning Councils. Added to these are external constraints which currently pose as obstacles to a Council's efforts to affect the development of housing on a regional scale. These obstacles must also be dealt with before Regional Councils will be able to provide effectively for low cost housing within a region. The external problems fall into three general areas:

1) technical
2) financial
3) local attitudes.

**Technical** - Problems of a technical nature essentially relate to the lack of uniformity in the extent and sophistication of planning efforts that are carried on throughout the region. Regions are usually composed of political subdivisions ranging from large metropolises to small
The planning efforts of these individual political subdivisions vary greatly, thus presenting special problems in fulfilling federal requirements in terms of "comprehensive planning, development, and city management procedures." Of particular importance to housing is the fact that one of the requirements for comprehensive planning is the development of a "workable program" which in turn provides the basis of code enforcement. Therefore, the enforcement of code plans under federal assistance is dependent upon the existence of some form of comprehensive plans.

For small cities the monitoring and enforcement of codes presents a special problem in terms of funding and execution. Many smaller cities do not have the necessary police power to conduct inspection and "the city officials themselves are unwilling to tackle the attitudes of individual owners or to educate the individuals involved in maintenance and general upkeep related to environmental quality." This lack of uniform code enforcement throughout a region presents a hindrance to Regional Councils in their efforts to provide a consistent quality of housing throughout the region.

Financial - Inadequate code monitoring or code enforcement has resulted largely from the shortage of available local, state and federal funds.

Even if uniform codes were adopted throughout a region, considerable
monies would have to be allocated for administering the code plans. Until these funds are made available, code enforcement will be limited as a tool for insuring quality construction and checking deterioration in housing.

One of the most significant financial obstacles to effectively solving the housing problem has been the lack of sufficient funds for housing programs at all governmental levels. Without properly funded housing programs, Regional Councils are rendered helpless to affect the problem.

Many of the federal programs have not as yet been funded sufficiently other than for token expenses in setting up administrative operations. State monies have not been made available for matching funds due to the knowledge of the limited funds available at the federal level. Private institutions have shown a great deal of reluctance to participate for reasons such as the lack of money available through open market, the high rate of interest involved, and greater potential returns from other markets for investment interests. 7

Local Attitudes - Few cities have the necessary funds to initiate a housing program on their own without some form of federal assistance. However, along with federal monies go federal guidelines. Because local decision makers have often found these stipulations undesirable, they have demonstrated a reluctance to participate in federal housing programs. The most controversy has developed around the Open Housing Clause which many localities see as a move which could alter the "general ecological and ethnic composition of the city." 8 Because of this, it has met
with "belligerent resistance" in many parts of the country. Rather than confront this highly volatile issue, local politicians have found it more politically expedient to avoid such programs. This attitude of resistance to federal programs on the part of local residents and politicians provides yet another hindrance to a council's efforts to provide low cost housing.

Clearly, these external problems must be addressed before any restructuring of the internal functional and organizational characteristics of Regional Councils will have any significant impact on their ability to solve the housing problem. The following recommendation, however, will be addressed to resolving the problems raised concerning the internal restructuring of Council functions, as described under the provisions of H.R. 9688.

The question of political detachment and the working relationship between Regional Councils and the FHA lead the author to conclude that realistically the H.R. 9688, as it now reads, will not be enacted. However, the trend toward strengthening the position of Regional Councils indicates that increased implementation authority in some form will eventually be designated to Regional Planning Councils. If some form of the H.R. 9688 is ratified, the pertinent question will arise: What workable means can be applied to augment the right of Regional Councils to implement plans? Following is a suggested alternative which
would indeed (1) grant extended implementation powers to Regional Councils and (2) simultaneously attempt to resolve some of the difficulties inherent in the present draft of the H. R. 9688 bill.

320 RECOMMENDATIONS

This study has presented a description of three approaches which Regional Planning Councils can assume in affecting the development of housing within a region. Two of these descriptions (H-GAC and MVRPC) are represented by case study examples and reflect the role which Regional Councils are presently performing; the third description is representative of the role which Regional Councils might assume in the future as defined in pending housing legislation.

These three approaches can be compared in terms of their potential for implementing housing plans and policies. The H-GAC can be thought of as being one pole where the lack of active local support has limited its ability to set objectives and guidelines for directing the development of federally assisted housing in the region. At the other pole is the role of Regional Councils as described in H. R. 9688. Here Councils not only have the authority to develop housing plans and policies, but also are given the authority to implement these plans by being designated as the organization to distribute federal housing funds. The
approach taken by the MVRPC is somewhere between these two poles. Because it has been able to generate local support, it has been able to establish regional housing objectives and guidelines; however, it is totally dependent on continued local support in order to implement its plans and policies.

Inherent in all three approaches is the potential for Regional Councils to serve as "regional information centers." In this capacity they could utilize their multijurisdictional/multipurpose vantage point to allow themselves to gather and disseminate information throughout the region. In so doing, they could indirectly affect the developer's decisions by making developers aware of investment potential in housing. The critical factor here is acquiring adequate federal, state and/or local financial support in order to perform these activities effectively.

As seen earlier in Part III, there exists a present trend in federal legislation and HUD policy to strengthen the implementation authority of Councils and in so doing allow them to assume a more assertive role in directing the development of federally assisted housing. The pending housing bill, H.R. 9688, outlines measures for accomplishing this end; however, the measures in this bill go to the extreme in providing Councils with implementation authority. Realistically the future role of Councils in implementing guidelines and objectives lies
somewhere between the approach presently taken by the MVRPC and the approach described in H.R. 9688.

Under the existing A-95 provisions, FHA has the authority to grant final project approval. The FHA office is the first to receive a project application. It then begins conducting its "economic feasibility analysis" and transmits the application to the Regional Council for its evaluation of the project's "environmental feasibility." Once it has received the Council's recommendations, the FHA staff makes a final decision on the project.

The recommendation offered here is that this review process be reversed. Because of the unique political/social/ and economic problems associated with federally assisted housing, the emphasis in the review of the project should be placed on insuring the environmental quality of the project. (The present trend in housing legislation and HUD policy reinforces this idea.) Therefore, the ultimate decision as to whether or not a project is funded should be determined by the agency most capable of assessing environmental quality. Clearly, under the existing review procedures, the agency which has final funding approval bases its decisions on economic criteria. Regional Councils on the other hand, because of their areawide/multipurpose orientation, would appear to be best suited to make the final decision on the basis of environmental criteria.
The recommended process of evaluation would be as follows:

1) The developer would submit a housing project proposal to the Regional Planning Council.

2) Negotiations would begin between the developer and the Council to improve the environmental quality of the project and to make the developer aware of conflicts or potential conflicts in the development of his site.

3) A preliminary project application would be drawn up and sent by the Council to the local FHA office.

4) The FHA staff would process the application in the standard way, evaluating the "economic feasibility" of the project.

5) The FHA staff would transfer the application back to the Council along with its recommendations as to the project's "economic feasibility."

6) The Council would negotiate with the developer any necessary changes.

7) The Council would complete its "environmental feasibility" evaluation and make a final decision as to whether the project would receive federal funding.

8) If the project is approved, the developer then works with the FHA office to transact legal documents.

In this situation, the developer works directly with the Council rather than indirectly through the FHA offices as is presently done. Further,
the Council is involved in the project from the initial stages when it can provide the greatest assistance to the developer. Indeed, by the time the Council receives an application, under the present A-95 provisions, many of the most important decisions (site selection, number and type of units, extent of support facilities) have been essentially determined. For the developer these decisions are most important, and it is information affecting these decisions (land values, available methods of funding, type and extent of housing need within the region, etc.) that the Councils could provide most effectively.

Important in this alternative is the fact that it does not attempt to merge both the Council and FHA into one super planning and funding agency. The identity and essential functions of both agencies are maintained - the only change being that now environmental rather than economic criteria would be the determining factor in project approval. FHA would continue to do what it does best - evaluate "economic feasibility." It would make its recommendations to the Council. Even if the FHA staff assessed the project as being "economically feasible," the Council would have the authority to reject the project on the basis of its environmental evaluation. The situation here would be one of giving priority to environmental versus economic criteria.
In summary, Regional Planning Councils because of their multijurisdictional/multipurpose orientation have a significant role to play in affecting the development of federally assisted housing within a region. Councils can fulfill the role by serving either as "regional information centers" or as regional planners/coordinators or as both. Crucial in determining what the future role of Councils will be is the endorsement given them by the Federal government. If the Federal government decides that Councils should serve as "regional information centers," then the Federal government must provide Councils with sufficient financial support to enable them to fulfill this responsibility with an advanced degree of sophistication. If the decision is made for Councils to function as regional planners/coordinators, then Councils must be given the additional authority which would allow them to effectively implement plans and policies; otherwise, these plans and policies are meaningless.

In the event that Councils are not given additional implementation authority, they will remain dependent on local support in order to assume an assertive role in directing housing development. In regions where support could not be generated, a Council's review functions would serve only as a negative factor in influencing housing development. Added to
this, the present review function in itself can only be seen as a tool for indirectly affecting the developer's decisions because of the lack of implementation authority to reinforce this function.

If on the other hand, implementation authority, such as the authority to distribute federal housing funds, were designated to Regional Planning Councils, they could on their initiative set objectives and guidelines. Through their review processes, these objectives and guidelines could be used to directly affect the production/distribution/and environmental quality of federally assisted housing within the region.

Providing for low and moderate income housing within a regional environmental context is seen as being the new approach to realizing the national goal of a "decent home and suitable living environment for every American family." Because of their unique position within the overall governmental framework, Regional Planning Councils could play a vital role in overseeing this approach and insuring its success.
Planning and development clearinghouse or clearinghouse includes:

a) An agency of the State Government designated by the Governor or by State law.

b) A nonmetropolitan regional comprehensive planning agency (herein referred to as "regional clearinghouse") designated by the Governor (or Governors in the case of regions extending into more than one State) or by State law.

c) A metropolitan areawide agency that has been recognized by the Office of Management and Budget as an appropriate agency to perform review functions under section 204 of the Demonstration Cities and Metropolitan Development Act of 1966.

Multi-jurisdictional area -- any geographical area comprising, encompassing, or extending into more than one unit of general local government.

Areawide agency -- an official State or metropolitan or regional agency empowered under State or local laws or under an inter-state compact or agreement to perform comprehensive planning in an area.

Metropolitan area -- a standard metropolitan statistical area as established by the Office of Management and Budget, subject, however, to such modifications and extensions as the Office of Management and Budget may determine to be appropriate for the purposes of section 204 of the Demonstration Cities and Metropolitan Development Act of 1966, and these Regulations.

Federal agency -- any department, agency, or instrumentality in the executive branch of the Government and any wholly owned Government corporation.

Federal assistance, Federal financial assistance, Federal assistance programs, or federally assisted program -- programs that provide assistance through grant or contractual arrangements. They include technical assistance programs, or programs providing assistance in the form of loans, loan guarantees, or insurance. The term does not include any annual payment by the United States to the District of Columbia authorized by article VI of the District of Columbia Revenue Act of 1947.
APPENDIX II
Federal Legislation Defining the Functions and Authorities of "Clearinghouse" Agencies
SECTION 204 OF THE DEMONSTRATION CITIES AND METROPOLITAN DEVELOPMENT ACT OF 1966, as amended (80 Stat. 1263, 82 Stat. 208)

"Sec. 204. (a) All applications made after June 30, 1967 for Federal loans or grants to assist in carrying out open-space land projects or for planning or construction of hospitals, airports, libraries, water supply and distribution facilities, sewerage facilities and waste treatment works, highways, transportation facilities, law enforcement facilities, and water development and land conservation projects within any metropolitan area shall be submitted for review—

"(1) to any areawide agency which is designated to perform metropolitan or regional planning for the area within which the assistance is to be used, and which is, to the greatest practicable extent, composed of or responsible to the elected officials of a unit of areawide government or of the units of general local government within whose jurisdiction such agency is authorized to engage in such planning, and

"(2) if made by a special purpose unit of local government, to the unit or units of general local government with authority to operate in the area within which the project is to be located.

"(b)(1) Except as provided in paragraph (2) of this subsection, each application shall be accompanied (A) by the comments and recommendations with respect to the project involved by the areawide agency and governing bodies of the units of general local government to which the application has been submitted for review, and (B) by a statement by the applicant that such comments and recommendations have been considered prior to formal submission of the application. Such comments shall include information concerning the extent to which the project is consistent with comprehensive planning developed or in the process of development for the metropolitan area

(No. A-95)
or the unit of general local government, as the case may be, and the extent to which such project contributes to the fulfillment of such planning. The comments and recommendations and the statement referred to in this paragraph shall, except in the case referred to in paragraph (2) of this subsection, be reviewed by the agency of the Federal Government to which such application is submitted for the sole purpose of assisting it in determining whether the application is in accordance with the provisions of Federal law which govern the making of the loans or grants.

"(2) An application for a Federal loan or grant need not be accompanied by the comments and recommendations and the statements referred to in paragraph (1) of this subsection, if the applicant certifies that a plan or description of the project, meeting the requirements of such rules and regulations as may be prescribed under subsection (c), or such application, has lain before an appropriate area-wide agency or instrumentality or unit of general local government for a period of sixty days without comments or recommendations thereon being made by such agency or instrumentality.

"(3) The requirements of paragraphs (1) and (2) shall also apply to any amendment of the application which, in light of the purposes of this title, involves a major change in the project covered by the application prior to such amendment.

"(c) The Bureau of the Budget, or such other agency as may be designated by the President, is hereby authorized to prescribe such rules and regulations as are deemed appropriate for the effective administration of this section."
"TITLE IV OF THE INTERGOVERNMENTAL COOPERATION
ACT OF 1968 (62 STAT. 1103)"

"TITLE IV — COORDINATED INTERGOVERNMENTAL
POLICY AND ADMINISTRATION OF DEVELOPMENT
ASSISTANCE PROGRAMS"

"DECLARATION OF DEVELOPMENT ASSISTANCE POLICY"

"Sec. 401. (a) The economic and social development of the
Nation and the achievement of satisfactory levels of living
depend upon the sound and orderly development of all areas,
both urban and rural. Moreover, in a time of rapid urbaniza-
tion, the sound and orderly development of urban communities
depends to a large degree upon the social and economic health
and the sound development of smaller communities and rural
areas. The President shall, therefore, establish rules and
regulations governing the formulation, evaluation, and review
of Federal programs and projects having a significant impact
on area and community development, including programs provid-
ing Federal assistance to the States and localities, to the
end that they shall most effectively serve these basic
objectives. Such rules and regulations shall provide for full
consideration of the concurrent achievement of the following
specific objectives and, to the extent authorized by law,
reasoned choices shall be made between such objectives when
they conflict:

(1) Appropriate land uses for housing, commercial,
industrial, governmental, institutional, and other purposes;

(2) Wise development and conservation of natural re-
sources, including land, water, minerals, wildlife, and others;

(3) Balanced transportation systems, including high-
way, air, water, pedestrian, mass transit, and other modes for
the movement of people and goods;

(4) Adequate outdoor recreation and open space;

(5) Protection of areas of unique natural beauty,
historical and scientific interest;

(6) Properly planned community facilities, including
utilities for the supply of power, water, and communications,
for the safe disposal of wastes, and for other purposes; and

(7) Concern for high standards of design.

(b) All viewpoints — national, regional, State and local
— shall, to the extent possible, be fully considered and taken

(No. 9-95)"
into account in planning Federal or federally assisted development programs and projects. State and local government objectives, together with the objectives of regional organizations shall be considered and evaluated within a framework of national public objectives, as expressed in Federal law, and available projections of future national conditions and needs of regions, States, and localities shall be considered in plan formulation, evaluation, and review.

"(c) To the maximum extent possible, consistent with national objectives, all Federal aid for development purposes shall be consistent with and further the objectives of State, regional, and local comprehensive planning. Consideration shall be given to all developmental aspects of our total national community, including but not limited to housing, transportation, economic development, natural and human resources development, community facilities, and the general improvement of living environments.

"(d) Each Federal department and agency administering a development assistance program shall, to the maximum extent practicable, consult with and seek advice from all other significantly affected Federal departments and agencies in an effort to assure fully coordinated programs.

"(e) Insofar as possible, systematic planning required by individual Federal programs (such as highway construction, urban renewal, and open space) shall be coordinated with and, to the extent authorized by law, made part of comprehensive local and areawide development planning."

"FAVORING UNITS OF GENERAL LOCAL GOVERNMENT"

"Sec. 402. Where Federal law provides that both special-purpose units of local government and units of general local government are eligible to receive loans or grants-in-aid, heads of Federal departments and agencies shall, in the absence of substantial reasons to the contrary, make such loans or grants-in-aid to units of general local government rather than to special-purpose units of local government."

"RULES AND REGULATIONS"

"Sec. 403. The Bureau of the Budget, or such other agency as may be designated by the President, is hereby authorized to prescribe such rules and regulations as are deemed appropriate for the effective administration of this title."

(No. A-95)
"Sec. 102. The Congress authorizes and directs that, to the fullest extent possible; (1) the policies, regulations, and public laws of the United States shall be interpreted and administered in accordance with the policies set forth in this Act, and (2) all agencies of the Federal Government shall—....

"(C) include in every recommendation or report on proposals for legislation and other major Federal actions significantly affecting the quality of the human environment, a detailed statement by the responsible official on—

"(i) the environmental impact of the proposed action,

"(ii) any adverse environmental effects which cannot be avoided should the proposal be implemented,

"(iii) alternatives to the proposed action,

"(iv) the relationship between local short-term use of man's environment and the maintenance and enhancement of long-term productivity, and

"(v) any irreversible or irretreivable commitments of resources which would be involved in the proposed action should it be implemented.

"Prior to making any detailed statement, the responsible Federal official shall consult with and obtain the comments of any Federal agency which has jurisdiction by law or special expertise with respect to any environmental impact involved. Copies of such statement and the comments and views of the appropriate Federal, State, and local agencies, which are authorized to develop and enforce environmental standards, shall be made available to the President, the Council on Environmental Quality and to the public as provided by section 525 of Title 5, United States Code, and shall accompany the proposal through the existing agency review processes;...."

(No. A-25)
APPENDIX III
Federal Programs
Subject to Clearinghouse Review
COVERAGE OF PROGRAMS UNDER ATTACHMENT A, PART I

1. Programs are listed below pursuant to section 204 of the Demonstration Cities and Metropolitan Development Act of 1966 and the Intergovernmental Cooperation Act of 1968. They are referenced by Catalog of Federal Domestic Assistance identification numbers.

2. Heads of Federal departments and agencies may, with the concurrence of the Office of Management and Budget, exclude certain categories of projects or activities under listed programs from the requirements of Attachment A, Part I. OMB concurrence will be based on the following criteria:

   a. Lack of geographic identifiability with respect to location or impact (e.g., certain types of technical studies);

   b. Small scale or size;

   c. Essentially local impact (within the applicant jurisdiction); and

   d. Other characteristics that make review impractical. OMB will notify clearinghouses of such exclusions.

3. Covered programs

   Department of Agriculture

   Farmers Home Administration

   10.400 Comprehensive Areawide Water and Sewer Planning Grants

   10.409 Irrigation, Drainage and Other Soil and Conservation Loans

   10.412 Recreation Association Loans

   10.414 Resource Conservation and Development Loans

   (No. A-95)
10.418 Water and Waste Disposal Systems for Rural Communities

10.419 Watershed Protection and Flood Prevention Loans

Soil Conservation Service

10.901 Resource Conservation & Development

10.904 Watershed Protection & Flood Prevention

Department of Commerce

Economic Development Administration

11.300 Economic Development -- Grants and Loans for Public Works and Development Facilities

11.302 Economic Development -- Planning Assistance

11.303 Economic Development -- Technical Assistance

Department of Defense

Department of the Army, Office of the Chief of Engineers

12.101 Beach Erosion Control

12.106 Small Flood Control Projects

12.107 Small Navigation Projects

12.108 Snagging and Clearing for Flood Control

Department of Health, Education, and Welfare

Environmental Health Service

13.001 Air Pollution Control Program Grants (Planning Only) 1

1) These programs are administered by the new Environmental Protection Agency for which there is as yet no separate Catalog listing.

(No. A-95)
Solid Wastes Demonstration Grants

Solid Wastes Planning Grants

Health Services and Mental Health Administration

Comprehensive Health Planning —
Arcawide Grants

Health Facilities Construction —
Diagnostic and Treatment Centers

Health Facilities Construction —
Hospitals and Public Health Centers

Health Facilities Construction — Long-
Term Care Facilities

Health Facilities Construction —
Rehabilitation Facilities

Mental Health — Community Assistance
Grants for Narcotic Addiction
(Construction Only)

Mental Health — Construction of Community
Mental Health Centers

Regional Medical Programs — Operational
and Planning Grants (Planning and
Construction Only)

National Institutes of Health

Health Professions Facilities Construction

Medical Library Assistance — Regional
Medical Libraries

Schools of Nursing — Facilities Con-
struction

These programs are administered by the new Environmental Protection Agency for which there is as yet no separate Catalog listing.

(No. A-95)
Office of Education

13.408 Construction of Public Libraries
13.456 Higher Education Academic Facilities -- State Comprehensive Planning
13.457 Higher Education Academic Facilities Construction -- Interest Subsidization
13.458 Higher Education Academic Facilities Construction -- Public and Private Colleges and Universities
13.459 Higher Education Academic Facilities Construction -- Public Community Colleges and Technical Institutes
13.477 School Assistance in Federally Affected Areas -- Construction
13.487 Supplementary Education Centers and Services (Construction Only)
13.493 Vocational Education -- Basic Grants to States (Construction Only)

Social and Rehabilitation Service

13.711 Juvenile Delinquency Planning, Prevention, and Rehabilitation (Planning and Construction Only)
13.716 Mental Retardation Community Facilities Construction
13.746 Vocational Rehabilitation Services -- Basic Support (Construction Only)

(No. A-95)
(Note: The following programs are subject to the limitations and procedures set forth in paragraph 7, Part I, of the Circular.)

14.100 College Housing Debt Service

14.101 College Housing Direct Loans

14.103 Interest Reduction Payments - Rental and Cooperative Housing for Lower Income Families (236)

14.105 Interest Subsidy - Homes for Lower Income Families (235(i))

14.112 Mortgage Insurance - Construction or Rehabilitation of Condominium Projects (234(d))

14.115 Mortgage Insurance - Development of Sales Type Cooperative Projects (213)

14.117 Mortgage Insurance - Homes (203(b))

14.118 Mortgage Insurance - Homes for Certified Veterans (203(b))

14.119 Mortgage Insurance - Homes for Disaster Victims (203(h))

14.120 Mortgage Insurance - Homes for Low and Moderate Income Families (221(d)(2))

14.121 Mortgage Insurance - Homes in Outlying Areas (203(i))

14.122 Mortgage Insurance - Homes in Urban Renewal Areas (220 homes)

14.124 Mortgage Insurance - Investor Sponsored Cooperative Housing (213)

(No. A-95)
14.125 Mortgage Insurance - Land Development and New Communities (Title X)
14.126 Mortgage Insurance - Management Type Cooperative Projects (213)
14.127 Mortgage Insurance - Mobile Home Courts (207)
14.134 Mortgage Insurance - Rental Housing (207)
14.135 Mortgage Insurance - Rental Housing for Low and Moderate Income Families (221(d)(4))
14.136 Mortgage Insurance - Rental Housing for Low and Moderate Income Families - Below Market Interest Rate (221(d)(3))
14.137 Mortgage Insurance - Rental Housing for Low and Moderate Income Families, Market Interest Rate (221(d)(3))
14.138 Mortgage Insurance - Rental Housing for the Elderly (231)
14.139 Mortgage Insurance - Rental Housing in Urban Renewal Areas (220)
14.146 Public Housing - Acquisition, Construction, Rehabilitation (New Construction Only)
14.149 Rent Supplements - Rental Housing for Low Income Families

Metropolitan Planning and Development
14.200 Basic Water and Sewer Facilities -- Grants
14.203 Comprehensive Planning Assistance
14.204 Historic Preservation Grants
14.207 New Communities -- Loan Guarantees

(No. A-95)
14.208 New Communities — Supplementary Grants
14.209 Open Space Land Acquisition and Development Grants
14.210 Public Facility Loans
14.214 Urban Systems Engineering Demonstration Grants

Model Cities Administration
14.300 Model Cities Supplementary Grants

Renewal and Housing Management
14.602 Community Renewal Planning Grants
14.606 Neighborhood Development
14.609 Urban Renewal Projects

Department of the Interior

Bureau of Outdoor Recreation
15.400 Outdoor Recreation — Financial Assistance
14.401 Outdoor Recreation Planning — Financial Assistance

Bureau of Reclamation
15.501 Irrigation and Drainage Systems Loans
15.503 Small Reclamation Projects

(No. A-95)
Federal Water Pollution Control Administration

15.700 Construction Grants for Wastewater Treatment Works 1/

15.701 Water Pollution Control -- Comprehensive Basin Planning Grants 1/

15.707 Water Pollution Control -- State and Interstate Program Grants 1/

National Park Service

15.904 Historic Preservation

Department of Justice

Law Enforcement Assistance Administration

16.500 Law Enforcement Assistance -- Comprehensive Planning

16.501 Law Enforcement Assistance -- Discretionary Grants

16.502 Law Enforcement Assistance -- Improving and Strengthening Law Enforcement

Department of Labor

Manpower Administration

17.205 Cooperative Area Manpower Planning System

1/ These programs are administered by the new Environmental Protection Agency for which there is as yet no separate Catalog listing.

(No. A-95)
Department of Transportation

Federal Aviation Administration

20.102 Airport Development Aid Program

Federal Highway Administration

20.201 Forest Highways

20.204 Highway Beautification -- Landscaping and Scenic Enhancement

20.205 Highway Planning and Construction

20.206 Highway Planning and Research Studies

20.209 Public Lands Highways

20.211 Traffic Operations Program to Increase Capacity and Safety (Construction Only)

Urban Mass Transportation Administration

20.500 Urban Mass Transportation Capital Improvement Grants (Planning & Construction Only)

20.501 Urban Mass Transportation Capital Improvement Loans (Planning & Construction Only)

20.505 Urban Mass Transportation Technical Studies Grants (Planning and Construction Only)

Appalachian Regional Commission

23.003 Appalachian Development Highway System

23.004 Appalachian Health Demonstrations (Planning and Construction only)

23.008 Appalachian Local Access Roads

(No. A-95)
23.010 Appalachian Mine Area Restoration

23.012 Appalachian Vocational Education Facilities

National Science Foundation

47.036 Intergovernmental Science Programs

Office of Economic Opportunity

49.002 Community Action Operations (excluding administration, research, training and technical assistance, and evaluation).

Water Resources Council

65.001 Water Resources Planning

(No. A-95)
APPENDIX IV
Houston-Galveston Area Council's
Housing Review Criteria
HOUSTON-GALVESTON AREA COUNCIL
REVIEW PROCEDURE FOR
FEDERAL HOUSING ADMINISTRATION APPLICATIONS

PROJECT NUMBER: ____________________________
NAME: ____________________________
LOCATION: ____________________________
MUNICIPALITY: ____________________________

H-GAC REVIEW DATE: ____________________________

APPROPRIATE AUTHORITIES NOTIFIED FOR COMMENT:
CITY ____________________________ SCHOOL DISTRICT ____________________________ W.C.I.D. ____________________________
COUNTY PLANNING OR ENGINEERING AUTHORITY ____________________________
FLOOD CONTROL ENGINEER ____________________________ OTHER ____________________________

COMMENTS:

A. ENVIRONMENTAL ASSESSMENT

PHYSICAL FACILITY ANALYSIS

<table>
<thead>
<tr>
<th>Utilities:</th>
<th>YES</th>
<th>NO</th>
<th>DEFICIENCY CORRECTED WITHIN</th>
<th>REVIEWED BY</th>
<th>TITLE</th>
<th>INTL</th>
</tr>
</thead>
<tbody>
<tr>
<td>Water</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Sewer</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

SERVICE FACILITY ANALYSIS

<table>
<thead>
<tr>
<th>Facility</th>
<th>YES</th>
<th>NO</th>
</tr>
</thead>
<tbody>
<tr>
<td>Fire Protection</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Schools</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Parks</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Green Belt</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

NEIGHBORHOOD FACILITY ANALYSIS

<table>
<thead>
<tr>
<th>Facility</th>
<th>YES</th>
<th>NO</th>
</tr>
</thead>
<tbody>
<tr>
<td>Streets</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Drainage</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Site (visit)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Compatibility w/ Existing Neighborhood</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

REMARKS:

SIGNATURE ____________________________

H-GAC FORM A-95/1 REVISED DEC. 1, 1971
PAGE 1 OF 2 PAGES
B. ENVIRONMENTAL IMPACT

ANALYSIS OF APPLICANT'S PRELIMINARY ENVIRONMENTAL CLEARANCE WORK SHEET

SYNOPTIC REVIEW:

SIGNATURE: ____________________________

H-GAC FORM A-95/1 REVISED DEC. 1, 1971
PAGE 2 OF 2 PAGES
PART I

(To be filled out by applicant and to accompany application documents. Append extra pages if space is not adequate for complete answer.)

1. Nature of Proposal. (Identify applicant, geographical location, and brief description of proposed project by type, purpose, general size or scale, cost level, etc.)

JOHN JAMAIL, BUILDER. ADDRESS:
PROJECT: 267 UNIT APT. CONSISTING OF 759,303 SQ.FT. AT A COST OF $6,490,000.00

2. List Environmental Impacts (beneficial and adverse) of the proposed action. (Identify land use aspects; environmental aspects of the site, including natural hazards. Environment includes physical, social, and aesthetic dimensions.)

THIS PROJECT WILL TEND TO SOLVE THE DEMAND FOR BETTER HOUSING FOR THE POPULATION IN THE IMMEDIATE AREA.

3. Identify any adverse environmental effects which cannot be avoided should the proposal be implemented.

NONE KNOWN

4. Outline principal alternatives to the proposed action.

NONE

5. What is relationship between the proposed short run use of environment and the maintenance of long run productivity? What irreversible or irreplaceable components of resources would be involved if the proposed action were implemented?

NONE

6. What are the known views of local groups to the proposed action? Identify known or potential opposition groups and their views.

NO OPPOSITION TO PROJECT IS KNOWN.

7. Indicate below all clearances which have been secured from State, Local or Federal authorities having statutory or regulatory responsibility for coordination or control of environmental matters.

IT HAS BEEN ESTABLISHED THAT SUFFICIENT WATER AND SEWER IS AVAILABLE AND THAT POLLUTION OF ANY KIND FROM THIS PROJECT WOULD BE NON EXISTANT.

November 3, 1971

Authorized Representative of Applicant
APPENDIX V
Miami Valley Regional Planning Commission's
Housing Review Criteria
MVRPC

EVALUATION SHEET

LOW AND MODERATE INCOME HOUSING PROJECTS

I. Project name __________________ Location ___________________
   Sponsor _______________ Contact _______________ Phone _________
   Type program _______________ Type occupant _______________ 
   Planning district _____________ School district _____________
   Manager _______________ Address _______________ Phone _________

II. Project Profile

   Buildings:
      TYPE ______________________
      Number of buildings _________ Units per building ________
      Type of construction ____________ EXTERIOR ______________

   Units, number of bedrooms, and size of units and rent per unit:

<table>
<thead>
<tr>
<th>No. of Units</th>
<th>Size of Units</th>
<th>RENT</th>
</tr>
</thead>
<tbody>
<tr>
<td>0 - Bedrooms</td>
<td></td>
<td></td>
</tr>
<tr>
<td>1 - Bedroom</td>
<td></td>
<td></td>
</tr>
<tr>
<td>2 - Bedrooms</td>
<td></td>
<td></td>
</tr>
<tr>
<td>3 - Bedrooms</td>
<td></td>
<td></td>
</tr>
<tr>
<td>4 - Bedrooms</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

   Density:
   Site size _______________ Dimensions ___________________
   Units per acre ____________

   Site distribution:
   Percent covered by buildings ________________________________
   Percent covered by parking lots ______________________________
   Percent covered by recreation ________________________________
   Percent covered by open space ________________________________

   Parking:
   Spaces required ________________________________
   Spaces available ________________________________
Landscaping:

Existing__________________ Planned__________________
Percent of total cost__________________

III. Characteristics of Site

Topography:__________________________________________

Zoning:

Presently__________________
Proposed__________________ Hearing date________

Utilities:

Not available (explain)__________________
Available at site _____ or within_______ Miles__

Present land use:____________________________________

Adjacent land uses:

Direction Use Condition Zoning Proposed Use

North__________________________________________
South__________________________________________
East___________________________________________
West___________________________________________

Condition of streets and curbs_____________________

Condition of sidewalks___________________________

Nuisance factors__________________________________

IV. Relationship to neighborhood and community

Neighborhood acceptance:

Neighborhood organization(s)_______________________
Contact(s)__________________ Phone__________________
<table>
<thead>
<tr>
<th>Hearing</th>
<th>Attendance</th>
<th>Action taken</th>
<th>Remarks</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>Hearing</th>
<th>Attendance</th>
<th>Action taken</th>
<th>Remarks</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>Hearing</th>
<th>Attendance</th>
<th>Action taken</th>
<th>Remarks</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>Hearing</th>
<th>Attendance</th>
<th>Action taken</th>
<th>Remarks</th>
</tr>
</thead>
</table>

Schools:

Students projected from project K-8 | 9:12 |
Present school capacity | % + - |
Distance to schools | Time by bus |

Employment Opportunities:

Manufacturing | Distance | Driving time |
Commercial | Distance | Driving time |
Public Employ. | Distance | Driving time |
Service | Distance | Driving time |
Other | |

Shopping:

Neighborhood | Distance | Driving time |
Sub-regional | Distance | Driving time |
Regional | Distance | Driving time |
CBD | Distance | Driving time |

Transportation:

Schedule | Company |
Distance to bus line | Time to CBD |
Recreation:
- Tot lots: Distance
- Playgrounds: Distance
- Parks: Distance

Medical:
- Doctors/Dentists: Distance
- Medical center: Distance
- Hospital: Distance

Child Care:
- Private child care facilities: Distance
- Child care centers: Distance

V. Conformance with Existing Plans

Transportation: ________________________________

Open Space: ________________________________

Comprehensive (community plans): ________________________________

Sewer and Water: ________________________________

Housing Plan: ________________________________

Others: ________________________________

Remarks: ________________________________
INTRODUCTION


3Samuel C. Jackson, Proceedings from the Third Annual Conference of Regional Councils, (1971).

PART I


5Ibid., p. 7.


First Session, 89th Congress, Demonstration Cities and Metropolitan Development Act of 1966.

Ibid.


Ibid.


Ibid., p. 1-1.

PART II


6Second Session, 61st Texas Legislature, "Regional Planning Commissions, Article 1011m, V. A. C. S.," (Austin, Texas, 1965).


8Responses from personal interviews with local public officials and private developers.


11Ibid., p. 11.

12Bertsch and Shafor, p. 2.

13Ibid., p. 2.
14 Miami Valley Regional Planning Commission, p. 5.

15 Bertsch and Shafor, p. 2.

16 National Conference on Housing, Regional Issues and Strategies, (St. Louis, Missouri, 1971), p. 34.

17 Ibid., p. 35.

18 Ibid., p. 36.


20 Ibid., p. 2.

21 Ibid., p. 9.

22 Ibid., p. 9.

23 Ibid., p. 10.

24 Institute of Urban Studies, p. 9.

25 Ibid., pp. 9-10.


27 Ibid., p. 13.

28 Ibid., p. 15.

29 Ibid.

30 Ibid., p. 16.

31 Ibid.

32 Ibid., p. 32.

33 Ibid., p. 55.

34 Ibid., p. 38.
PART III


3 Ibid., p. 71.

5. Ibid., p. 2.

6. Ibid., p. 3.

7. Ibid., p. 3.

8. Ibid., p. 6.
BIBLIOGRAPHY
BOOKS


Binkley, Wilfred E. President and Congress. New York, 1970.


--- A Time for Decision. Dayton, Ohio, Undated.


Presidential Publication. Highlights of Revenue Sharing: Reform Renewal for the '70's.


U.S. President's Committee on Urban Housing. A Decent Home. Washington, D.C., 1968.


PERIODICALS


Faltermayer, Edmund. "Metro-government, Twin Cities-Style".


GOVERNMENTAL DOCUMENTS


Second Session, 75th Congress. U.S. Housing Act of 1938. 50 Statute 896.


INTERVIEWS

Ainley, Bill. Staff Assistant, Houston-Galveston Area Council, Houston, Texas.

Christy, Howard B., Jr. Regional Planner, Houston-Galveston Area Council, Houston, Texas.

Coleman, Gerald R. Executive Director, Houston-Galveston Area Council, Houston, Texas, February 18, 1972.

Conant, Ralph W. President, Southwest Center for Urban Research, Houston, Texas, February 15, 1972.


Higdon, Phil. Law Student, University of Texas, Austin, Texas. February 18, 1972.

Lord, Tom Forrester. Executive Director, Houston Housing Development Corporation. Houston, Texas
McMillan, Tom. Law Student, University of Texas, Austin, Texas. February 18, 1972.


Pawley, Martha L. Librarian, Houston-Galveston Area Council. Houston, Texas.


Sherman, R. J. Houston Housing Authority, Houston, Texas. March 9, 1972.


Trost, Charles. Planning Director, Houston-Galveston Area Council, Houston, Texas. March 10, 1972

Turner, Clark P. Deputy Director of Comprehensive Planning, MVRPC, Dayton, Ohio. March 13, 1972. (Phone Conversation)


Ziehler, Paul M. Deputy Director, Management Systems, MVRPC, Dayton, Ohio. March 24, 1972. (Phone Conversation)

Zieten, Mark. Associate Planner, MVRPC, Dayton, Ohio. March 24, 1972. (Phone Conversation)