

August 18, 2015

Regulations and Paperwork Management Branch
U.S. Department of Agriculture, STOP 0742
300 7th Street SW
Washington, D.C. 20024

Re: USDA-RD's Interim Rule on Strategic Economic and Community Development

To Whom It May Concern:

I am submitting comments on the U.S. Department of Agriculture's Rural Development (USDA-RD) Interim Rule on Strategic Economic and Community Development (Docket Number RIN 0570-AA94) on behalf of Two-Rivers Ottauquechee Regional Commission (TRORC) and as a member of the National Association of Development Organizations (NADO). I appreciate the opportunity to comment on the Interim Rule and the new regional prioritization process that was included in the Agricultural Act of 2014 (P.L. 113-79).

Regional development organizations (RDOs) have a demonstrated record of implementing and operating many USDA Rural Development grant, loan, and technical assistance programs in rural communities across the United States. I appreciate that the Interim Rule allows USDA Rural Development to finally allocate investments to projects driven by regional priorities highlighted through multi-jurisdictional plans and partnerships.

I am also pleased that this new rule incentivizes and broadly supports regional planning approaches that have demonstrated a path of cooperation and collaboration among business leaders, governmental entities, nonprofits, and educational institutions in rural areas.

Additionally, this new rule will make it easier for rural communities to access resources to invest in long-term economic and community development efforts by giving priority to applications for Rural Development programs that include regional partnerships and strategies facilitated by the national network of RDOs.

Definitions (Section 1980.1005)

I appreciate that a plan is defined in the rule as a comprehensive economic or community development strategy that outlines a regions strengths, weaknesses, opportunities, and potential threats. We also want to thank USDA for highlighting the U.S. Economic Development Administration (EDA) and it's locally driven planning process through the national network of Economic Development Districts (EDDs).

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William B. Emmons, III, Chair
Peter G. Gregory, AICP, Executive Director

I strongly encourage the department to not only define a plan as "a comprehensive economic development or community development strategy" that is multi-jurisdictional in scope, but also include other federally recognized plans such as the Sustainable Communities Plans, recognized by the U.S. Department of Housing and Urban Development; and Stronger Economies Together Plans, recognized by the U.S. Department of Agriculture. Many RDOs also develop and prepare Regional Comprehensive Plans as required by state statutes.

Additionally, I appreciate the department's definition of a multi-jurisdictional plan to be understood not as a single issue plan, but as an all-inclusive document taking into account many factors that make an economy and region stronger.

Applications (Section 1980.1015)

I believe it should be clearly explained that the individual USDA-RD project does not need to be specifically listed in a plan to be eligible for priority points under this section, rather projects that are consistent with the goals, policies, and objectives of the multi-jurisdictional plan are deemed as eligible activities.

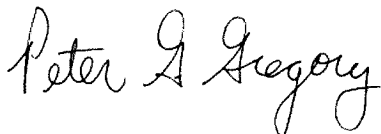
Scoring (Section 1980.1020)

I strongly support the agency's process for scoring applications that are seeking priority consideration. In particular, the focus on existing regional plans and how well they address regional collaboration. I also appreciate the inclusion of consideration of other funding sources including philanthropic investments and other federal agency awards when allocating points. However, I believe scoring should be broadened to allow for state and local agency investments, not just other federal investments.

I would also suggest that the department consider a higher maximum point allowance for this Interim Rule given the amount of time and effort it takes to truly build a multi-jurisdictional plan that meets the definitions and application requirements under this section.

Thank you again for the opportunity to comment on the U.S. Department of Agriculture's Rural Development (USDA-RD) Interim Rule on Strategic Economic and Community Development (Docket Number RIN 0570-AA94).

Sincerely,

A handwritten signature in black ink that reads "Peter G. Gregory". The signature is written in a cursive, flowing style.

Peter Gregory, AICP
TRORC Executive Director