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August 14, 2015

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

RE: U.S. Department of Agriculture Rural Development
Interim Rule on Strategic Economic and Community Development
Docket Number RIN 0570-AA94

Dear Sir/Madam:

The Council is pleased to submit comments on the U.S. Department of Agriculture Rural Development (USDA-RD) Interim Rule on Strategic Economic and Community Development. The Department should be commended for highlighting the U.S. Economic Development Administration (EDA) and its locally driven planning process through the national network of Economic Development Districts (EDDs).

We 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; Stronger Economies Together Plans, recognized by the U.S. Department of Agriculture; and Regional Comprehensive/Policy Plans as required by state statutes.**

The rule should clearly state that an 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.**

The scoring of applications should be broadened to allow for **state and local agency investments, not just other federal investments.** Finally, the Department should also consider a **higher maximum point allowance** for this Interim Rule given the amount of time and effort it takes to build a multi-jurisdictional plan that meets the definitions and application requirements under this section.

If you have any questions concerning this matter, please do not hesitate to contact me at 352.955.2200, ext. 101 or koons@ncfrpc.org.

Sincerely,

Scott R. Koons, AICP
Executive Director

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