

Metropolitan Planning Organizations as a Vehicle for Regional Housing Planning

A CASE STUDY OF SAN DIEGO, SEATTLE, AND DENVER
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Introduction

In many cities and towns across the U.S., local regulations governing land use, local resistance, market incentives, and limited institutional capacity have constrained much-needed new housing development. The imbalance in housing stock and need has led to a dire housing crisis – a 2020 analysis placed the housing supply deficit at 3.8 million units (Housing Supply: A Growing Deficit - Freddie Mac, n.d.). The housing supply deficit in conjunction with stagnation in wages has also led to a national housing affordability crisis; a 2022 analysis found that 19.2 million working-age renter households are housing cost-burdened (Airgood-Obrycki et al., 2022).

There are myriad factors contributing to the national housing shortage. However, localities and their approaches to housing development have played a significant role in the current crisis (Jenny Schuetz, 2022). This is partially because of the nature and structure of local control but localities' decisions related to fiscal policy, land use planning, and zoning have in many cases limited housing development in places where it is most needed. Expanding regional planning authority offers an avenue to ameliorate many of these issues (Orfield, 2009). For example, regional planning organizations can review comprehensive plans, provide technical assistance, and require coordination across a region to meet housing production needs. Additionally, they also may be tasked with distributing federal funds such as LIHTC and CDBG to encourage municipalities to abide by regional planning authority policies. Importantly, there are already regional planning authorities well positioned to perform this work – Metropolitan Planning Organizations (MPOs) and Councils of Governments (COGs). Notably, while MPO and COGs have different mandates, many organizations operate as both MPOs and COG (National Association of Regional Councils, n.d.) This research includes three case study organizations – two of which are MPO/COGs and one which is an MPO. The literature focuses on MPOs as federal law more clearly defines the role of MPOs, which has also limited their activities in the absence of state planning authority and funding. Conversely, COGs have a broader range of responsibilities with greater variation depending on the state.

MPOs have historically been siloed in transportation planning, tasked with carrying out the metropolitan transportation planning process. Though MPOs receive federal funds for transportation planning, some MPOs have recognized the need for broader regional planning and have begun to perform housing planning as well. The regional organizations (which house the

area MPOs) for the Twin Cities metro area and the Portland, Oregon metro area are often cited as examples of MPOs that have successfully evolved into multipurpose governments with regional housing planning (and have been exhaustively studied, see Orfield et al., 2009 and Orfield, 1998). However, a second wave of MPOs has begun interventions in regional housing planning. MPOs for Seattle, San Diego, and Denver have been given additional state-mandated powers and “are arguably evolving into multipurpose governments” (Orfield & Luce, 2009). This research seeks to evaluate this second generation of MPOs/COGs with expanded powers in regional housing planning – with an analysis of their varied approaches.

Research Questions

- 1) RQ 1: How have the MPOs/COGs in San Diego, Seattle, and Denver expanded their role in managing regional housing needs?
 - a. From where does the authority for expanded powers come?
 - b. How is this work funded?
- 2) RQ2: How do they approach regional housing planning?
 - a. How is regional housing planning incorporated into their other work?

Literature Review

This research brings together scholarship across three fields of study: barriers to housing development, the role of regional governments in planning, and methods to achieve needed housing production through regional planning.

Barriers to housing development

One of the biggest issues in planning today is the lack of housing where people need it most. While there are myriad culprits in the current housing shortage in the U.S., many local governments and their approaches to managing housing stock are partially to blame. Part of the challenge localities face is that housing is regional in scope but treated as a local issue (Orfield, 2009). Currently, federal policies can incentivize housing, but the federal government has “little direct influence on housing supply” (Jenny Schuetz, 2022). States play a role in distributing federal funds and defining a local government’s authority – and importantly, can preempt localities from adopting certain policies, such as inclusionary zoning. However, within these constraints, it is the responsibility of localities to determine land uses and regulate housing

production. When localities alone are responsible for managing housing development, they are confronted with local resistance, limited planning capacity, competing fiscal interests, and convoluted entitlement processes (Jenny Schuetz, 2022). As a result of these forces, housing is not being developed at the levels necessary and in the places most needed; and when housing is produced, it is often pushed out to suburban and exurban communities, only furthering sprawl and its consequences for transportation, quality of life, and sustainability (Orfield, 2009): Moreover, the ramifications of constrained housing development are not shared equally: “There are clear social and economic costs to the way many local governments currently regulate housing supply—costs that are largely borne by lower-income, younger, and non-white households” (Jenny Schuetz, 2022).

Regional Planning Authority

MPOs were first established through the Federal Aid Highway Act of 1962 and then strengthened via the Intermodal Surface Transportation Efficiency Act of 1991 (Metropolitan Planning: A History of Success, an Uncertain Future? – The Eno Center for Transportation, 2016). They are required to represent localities in all urbanized areas with populations over 50,000, as determined by the U.S. Census (Metropolitan Planning Organization (MPO) | FTA, n.d.). Now, there are nearly 420 MPOs across the U.S. planning for regional transportation planning expenditures and are responsible for the continuing, cooperative, and comprehensive transportation planning process for their urbanized area. Additionally, nearly half of MPOs operate as part of a Regional Council or Council of Governments serving the same general geography (National Association of Regional Councils, 2012).

While historically confined to regional transportation planning, MPOs are well suited to conduct broader regional planning efforts (Orfield, 2009): “If state-level planning is “too big” and local planning is “too small”, the “just right” scale of MPOs can view the connections across boundaries, facilitate cooperative priority-setting and decision-making...”(Metropolitan Planning: A History of Success, an Uncertain Future? – The Eno Center for Transportation, 2016). Alternatively, COGs have a broader role in regional governance, determined by member jurisdictions. Part of the differentiation between COGs and MPOs is that MPOs originated as top-down, federally designated, and funded organizations with a clear population threshold mandating their existence. COGs have a larger range of responsibilities, varying in response to

the needs of their constituents. However, states can add additional responsibilities to both COGs and MPOs. Lastly, MPOs may be housed within COGs, joined with COGs, or operate separately from the area COG. Roughly 60 percent of MPOs are “hosted” by another agency and the remaining 31 percent operate independently (National Association of Regional Councils, 2012).

Regional planning methods to meet housing needs

Since MPOs are federally funded and designated, they provide the most potential for reform. There are a range of tools MPOs could if given adequate regulatory power and funding, use to remedy the issues surrounding local regulation of housing development. This includes comprehensive plan consistency, performing regional assessments of housing needs, requiring a coordinated application for funding such as LIHTC and CDBG, as well as providing guidance on land use and zoning reform and additional planning capacity (Jenny Schuetz, 2022). Some COGs and MPOs have the authority to review member jurisdictions’ comprehensive plans to ensure they are compliant with regional or state goals. For instance, Washington State’s Growth Management Act enables RTPOs to review comprehensive plans for accordance with multi-county planning policies, the regional transportation plan, and Growth Management Act requirements for transportation planning (Municipal Research and Services Center of Washington (MRSC), n.d.). In the case of California, the RHNA is binding and if localities are not compliant, with recent legislation, they may have their residential zoning laws (Association of Bay Area Governments, n.d.). Washington State takes another approach: if localities’ plans are not certified they may be ineligible for federal transportation funds from the designated Regional Transportation Planning Organization (RTPO) (PSRC, 2021).

Second, MPOs already conduct a regional growth plan to assess future housing needs. As part of this regional growth vision, the housing needs of each locality may be assessed and provided to their planning authority. As a further incentive for meeting this housing need, the funding for CDBG and LIHTC should be shifted to be allocated at the MPO level as opposed to states and localities (Jenny Schuetz, 2022). Second, MPOs can guide land use and zoning reform at a regional level, which can be adapted to fit the needs of its member localities. Overhauling zoning codes is time intensive but providing guidance and funding incentives can help improve housing outcomes. For instance, reforms such as allowing ADUs, missing middle housing, and upzoning near transit would allow for broader housing choice and stock in a region.

Additionally, while localities may face resistance in enacting these reforms, they may be more successful if they are supported by a regional organization and can justify reforms to their residents in the context of meeting regional growth needs and being eligible for funding. Lastly, the capacity of planning departments across the country varies widely and MPO/COGs may be empowered to help provide planning capacity and regional consistency (Jenny Schuetz, 2022). Additional support in technical planning will be essential as localities are encouraged to follow MPO/COG guidance and enact the discussed reforms.

Research Methodology

Research has shown the need for regional planning organizations in housing planning. MPO and COGS are well suited to take a larger role in coordinating localities to meet regional housing needs. Therefore, this research employs a mixed-method approach to assess regional housing planning at the MPO/COG level in Seattle, San Diego, and Denver. These case studies were selected as they have robust regional planning operations, similar population sizes (3.3-4 million), but varying levels of state authority requiring regional planning. It will first be important to understand the structure of the organization, and how it is funded, staffed, and governed. This will provide essential context in understanding the framework under which the organization is operating. This information was provided through organization websites and in yearly budgets. Secondly, a desktop compilation of each of the MPO/COG planning efforts and strategies on housing was conducted. This involved a thorough review of the organizations' websites and their planning documents. Third, interviews were conducted with housing planners at the MPO/COG to provide additional context on the housing planning process. Finally, the efforts and approaches of each organization will be critically analyzed individually, as well as in contrast with the other selected organizations. Their work will also be considered in the context of the work of the MPO/COGs in Portland and the Twin Cities. Through these efforts, this work documents current efforts at three MPOs/COGs across the country and provides valuable insight into various approaches and successes in managing regional housing needs.

Case Study MPO Background

This section provides general information on each case study organization's roles, governing structure, budget, and regional planning efforts. Information was gathered from each

organization's websites and companion pages from the states or partners where relevant. The research informs the interviews with planners and analysis.

San Diego Association of Governments (SANDAG)

SANDAG was established in 1980 as both an MPO and a COG for the San Diego region. SANDAG serves more than 3.3 million people across 18 cities, the county of San Diego, and 17 federally recognized Tribal Governments (Annual Report, 2022) SANDAG is governed by a Board of Directors made up of elected officials appointed from the region's local governments as well as the County of San Diego Board of Supervisors. Additionally, representatives from local transit providers and other relevant associations (such as the Port of San Diego, Water Authority, and U.S. Department of Defense) serve on the Board as non-voting members (SANDAG About, n.d.). SANDAG has six Policy Advisory Committees comprised of "elected officials, residents, partner agencies, and representatives of civic and community groups" (SANDAG Policy Advisory Committees, n.d.). The Regional Planning Committee oversees SANDAG's Regional Comprehensive Plan including the housing component.

Notably, SANDAG has a large budget to fund its efforts. In FY2023, SANDAG's total budget was \$1.04 billion including \$261.9 million from federal grants, \$146.9 million from state grants, \$424 million from TransNet Sales Tax Revenue, and roughly \$207 million from other funding sources.

Puget Sound Regional Council (PSRC)

PSRC was established in 1956 as the MPO for the Seattle region in Washington State and serves over 4 million people. Its members include more than 100 entities including four counties, as well as cities, towns, ports, state and local transportation agencies and Tribal governments within the region (PSRC Our Members, n.d.). PSRC is governed by its Executive Board and General Assembly. The General Assembly includes all mayors, county executives, commissioners, and council members of PSRC member jurisdictions. The General Assembly meets annually to vote on major decisions, establish the budget, and elect new officers. Additionally, the General Assembly appoints the 36-member Executive Board which meets monthly to direct PSRC's work (PSRC Boards, n.d.)

Lastly, for FY2022-2023 PSRC has a total budget of \$34.6 million including \$150,000 for VISION 2050 Implementation and an additional \$72,000 for housing assistance; \$5.3 million of its revenue is from local sources and membership dues, \$1.5 million is from state funds, and \$19.6 is from federal funds (Biennial Budget and Work Program: Fiscal Years 2022-2023 (July 2021-June 2023), 2022). The remaining \$8.2 million are carryover funds.

Denver Regional Council of Governments (DRCOG)

DRCOG was established in 1955 and has taken on the roles of MPO, COG, Area Agency on Aging (AAA), and Regional Planning Commission (RPC) for the Denver region. DRCOG serves 3.37 million people across more than 50 member governments. DRCOG's Board of Directors is made up of elected officials from each of the member governments. Additionally, "the Governor appoints three non-voting representatives, and the Regional Transportation District has a non-voting member"(DRCOG Board of Directors, n.d.). In addition to its roles as an MPO and a COG, DRCOG is the federally designated AAA, and carries out programs under the Older Americans Act and Older Coloradans Act (DRCOG At a Glance, 2013). DRCOG also functions as the RPC for the area and under Colorado state statute, is tasked with preparing the plan for the region's development (Metro Vision). Notably, DRCOG's member governments exercise discretion in implementing Metro Vision.

Lastly, in FY2022-2023, DRCOG had a budget of \$34.8 million including \$23.5 million from federal grants/programs, \$6.02 million from state grants, \$1.93 million from local/other funds, \$2 million from member dues, and \$1.33 million from in-kind services.

Regional Housing Activity

San Diego Association of Governments (SANDAG)

SANDAG stands out across the case studies in this analysis because of California's mandated Regional Housing Needs Assessment. Every eight years California's Department of Housing and Community Development (HCD) issues a regional housing need determination and then the COG is responsible for allocating the housing need among the jurisdictions within that region (Regional Housing Needs Allocation (RHNA), n.d.). In 2020, SANDAG published the Sixth Cycle Regional Housing Needs Assessment Plan, identifying how the 171,000 new housing units HCD determined were needed in the region between 2021 – 2029, would be allocated across

jurisdictions. As part of this process, SANDAG developed a methodology weighing the availability of transit and jobs with an equity adjustment to promote fair housing. Member jurisdictions and the public provided feedback on the methodology. After the methodology was updated, it was reviewed and approved by HCD, and the final housing allocation was made (Final 6th Cycle Regional Housing Needs Assessment Methodology, 2019). Additionally, SANDAG serves as a regional forum for technical assistance and information exchange as jurisdictions update their housing elements to comply with RHNA. SANDAG's Housing Assistance Program (HAP) is the primary avenue for working with member jurisdictions on housing planning. HAP is guided by five policy goals: producing housing for all, preserving vulnerable housing, promoting equity, inclusion, and sustainability, protecting tenants, and preventing displacement. HAP is funded in part by the Regional Early Action Planning (REAP) grant, a state funding source directed to MPOs. In 2019 SANDAG received \$6.8 million through REAP 1.0 to support the creation of housing elements in its member jurisdictions (Final Program Budget Fiscal Year 2023, 2022) Additionally, SANDAG anticipates \$43 million in REAP 2.0 funds to support the implementation of housing elements through HAP.

Local jurisdiction support under HAP includes technical assistance (HAP TA), education and outreach efforts, an on-call consultant bench, and Capital and Planning Grants. Regional initiatives include various region-wide housing-related studies (for example a Regional Anti-displacement Strategy), regional financing opportunities, and opportunities for regional convenings. The HAP TA was recently launched and includes four main components to help jurisdictions implement their housing elements, prepare for and implement new housing legislation, and streamline CEQA and permitting processes for local housing developments. This includes providing trainings and webinars, templates and toolkits, legislation tracking, and local staffing assistance. This program was designed to be flexible as jurisdictions' needs change in response to state regulations (SANDAG, 2022).

Lastly, SANDAG is also the regional coordinator for the state's Affordable Housing and Sustainable Communities (AHSC) Program which funds projects that combine affordable housing with sustainable transportation improvements. SANDAG supports grant applications directly through coordination efforts & letters of consistency, as well as applying as a co-applicant as appropriate (SANDAG Affordable Housing & Sustainable Communities Program, n.d.). See Table 1 for summary information on SANDAG and its housing planning activities.

Puget Sound Regional Council (PSRC)

Washington State's Growth Management Act (GMA) makes PSRC the Regional Transportation Planning Organization (RTPO) for the area. The long-range plan for the region, VISION 2050, fulfills PSRC's responsibilities under the GMA. VISION 2050 lays out multi-county planning policies and growth targets. Additionally, as mandated by the GMA, PSRC certifies transportation-related provisions in local comprehensive plans including determining conformity with state requirements for transportation planning in local plans; consistency with adopted regional guidelines and principles; and consistency with the Regional Transportation Plan. PSRC staff review localities' comprehensive plans and determine whether they can be certified, conditionally certified, or not certified. Localities must have certified plans to be eligible for federal transportation funding (PSRC, 2021).

A major focus of VISION 2050 is the Regional Housing Strategy and Regional Housing Assistance Program. The Regional Housing Strategy, adopted in February 2022, provides the framework for regional housing assistance by conducting a regional housing needs assessment (RHNA), developing strategies and best practices for increasing housing supply, as well as coordinating other regional and local housing efforts (PSRC, 2022). The RHNA provides a thorough analysis of the existing housing stock, future growth, and demand for housing in the region and the four-member counties (PSRC, 2022a). Notably, the RHNA is used to guide housing planning in PSRC's member jurisdictions but is not binding. There is also a Regional Center Framework laid out in VISION 2050 that includes both growth centers and manufacturing centers. Centers receive priority funding for FHWA and FTA grants administered by PSRC.

Additionally, PSRC's Regional Housing Assistance includes providing guidance for developing local housing targets and policies, performing technical assistance, and collecting and analysis of regional housing data (PSRC, 2020). In December 2022, PSRC published a monitoring report of its Regional Housing Strategy and intends to update the Housing Strategy in 2024 based on the report results as well as a subsequent review of housing data (PSRC, n.d.). PSRC also partnered with the Washington State Department of Commerce to conduct a housing survey in 2022 (PSRC & Washington State Department of Commerce, 2022) See Table 1 for summary information on PSRC and its housing planning activities.

Denver Regional Council of Governments (DRCOG)

The main way DRCOG influences housing planning in the region is through its Metro Vision and the designation of urban centers. Member jurisdictions apply to DRCOG to have an area in their boundary designated as an urban center to direct growth and development. DRCOG has different subcategories for urban centers and detailed criteria for designating urban centers (DRCOG, 2011b). There are 105 designated urban centers across 26 of DRCOG's member governments; "Together, they hold over a tenth of the region's housing supply and over a third of the region's jobs while making up about one percent of the region's area" (DRCOG, n.d.). In the past, DRCOG has conducted a basic analysis to determine the build-out rate and needed new housing units in each of the urban centers. The 2035 Metro Vision (published in 2011) found that urban centers as a whole were on track to meet 2035 housing and employment goals (DRCOG, 2011a). While DRCOG does not directly fund urban centers, having designated urban centers in a jurisdiction incentivizes planning and funding.

The most recent Metro Vision Plan, published in 2017 and amended in 2019, included new sections on housing and livability. The plan includes several housing-related goals for 2040; 25 percent of the region's housing should be within urban centers; 20 percent of the region's housing and employment should be near rapid transit stations or high-frequency transit stops; less than 0.9 percent of the region's housing should be in high-risk areas; and 50 percent of the region's population should be living in areas with housing and transportation (H+T) costs affordable to the typical household in the region (DRCOG, 2019). The plan includes baseline measures for each goal as well as strategic initiatives for both regional and local organizations. However, jurisdictions are not required to implement Metro Vision.

Lastly, DRCOG has recently launched a technical assistance pilot program to support member governments in reassessing the land use and transportation connection of past plans or projects. The program has a budget of \$150,000 and is aimed at allowing jurisdictions to update plans to ensure they are in alignment with current priorities (DRCOG, 2022). See Table 1 for summary information on DRCOG and its housing planning activities.

Table 1. Background Information Summary Table

	SANDAG	PSRC	DRCOG
Region	San Diego, CA	Seattle, OR	Denver, CO
Population	3.32 million	4.07 million	3.37 million
Roles	<ul style="list-style-type: none"> • MPO • COG 	<ul style="list-style-type: none"> • MPO • Regional Transportation Planning Organization 	<ul style="list-style-type: none"> • MPO • COG • Area Agency on Aging (AAA) • Regional Planning Commission (RPC) for the Denver Region
Topline Budget (most recent fiscal year) Numbers are rounded	<ul style="list-style-type: none"> • FY2023: \$1.04 billion <ul style="list-style-type: none"> ○ \$261.9 million from federal grants ○ \$146.9 million from state grants ○ \$424 million from TransNet Sales Tax Revenue ○ \$~207 million from other funding sources 	<ul style="list-style-type: none"> • FY2022-2023: \$34.6 million <ul style="list-style-type: none"> ○ \$19.56 million from federal grants ○ \$1.51 million is from state grants ○ \$8.22 million in local and grant funds carried over from previous fiscal years ○ \$5.31 million in local funds 	<ul style="list-style-type: none"> • FY2022-2023: \$34.8 million <ul style="list-style-type: none"> ○ \$23.5 million from federal grants/programs ○ \$6.02 million from state grants ○ \$1.93 million from local/other funds ○ \$2 million from member dues ○ \$1.33 million from in-kind services
Governing Structure	Board of Directors is made up of elected officials from member jurisdictions, the San Diego County Board of Supervisors, and non-voting members from stakeholder groups.	Governed by a General Assembly and Executive Board. General Assembly is made up of representatives from all member organizations and meets annually. General Assembly appoints the Executive Board which meets monthly and directs PSRC’s operations.	Board of Directors is made up of elected officials from each of the member governments. Governor appoints three non-voting representatives, and the Regional Transportation District has a non-voting member.
Technical Assistance and Planning Capacity for Housing	Offers technical assistance to jurisdictions through HAP.	Offers technical assistance to jurisdictions as part of Regional Housing Assistance.	Recently launched a pilot technical assistance program focused on updating existing plans. Does not directly address housing.

Long Range Regional Plan with Housing Component and/or Regional Growth Forecasts	Regional Plan includes RHNA Plan and Regional Growth Forecast and Land Use Pattern.	VISION 2050 includes Regional Housing Strategy which is intended to support the Regional Growth Strategy and Growth Management Act.	Required to develop a regional plan but does not include a specific housing component or regional growth forecasts. However, there are housing-related goals and policies.
Provides Funding for Housing Projects in Member Jurisdictions	Significant funding for Housing Acceleration Program through state REAP grant. Coordinates state AHSC program.	Does not appear to directly fund housing projects in member jurisdictions.	Does not directly fund housing projects in member jurisdictions.
Regional Housing Needs Assessment	Binding RHNA as mandated by California. SANDAG determines allocation among member jurisdictions.	PSRC was directed to perform 2021/2022 RHNA as part of VISION 2050. Intended as a resource for member jurisdictions and is non-binding.	DRCOG does not perform a RHNA.
Authority to compel jurisdictions to comply with regional planning efforts	The RHNA allows SANDAG to require localities to be compliant with their allocated housing needs. If the Housing Element of a member jurisdiction is not in compliance with the RHNA, the locality may have their residential zoning code suspended by California's Department of Housing and Community Development.	PSRC certifies each member jurisdiction's comprehensive plan. For member jurisdictions to be eligible for federal transportation funds, their comprehensive plan must be in alignment with multi-county planning policies, the regional transportation plan, and Growth Management Act requirements for transportation planning. Washington State's Growth Management Act provides the authority for PSRC to perform a comprehensive plan review.	DRCOG does not have the authority to compel member jurisdictions to comply with regional planning efforts.
Other Housing Activities		Partnership with the Washington State Department of Commerce to conduct a housing survey in 2022.	Maintains a regional housing unit dataset and has several reports/studies on housing in the region. Designates urban centers in region and directs development including housing.

Analysis and Opportunities

Findings

Regional planning is largely dependent on state authority

The case study analysis reveals the importance of state legislation in enabling regional planning. Since MPOs are only required to prepare a regional transportation plan, any additional comprehensive planning, plan review, regional housing needs assessment, or technical assistance is being conducted in accordance with state laws and funded by non-federal sources. The Growth Management Act in Washington and California's RHNA provides additional authority for both PSRC and SANDAG to review member jurisdictions' plans.

Only a fraction of states have legislation requiring regional planning consistency: in a 2022 survey of state planning laws, the American Planning Association tracked core planning laws such as whether statutes include guidelines for a state-level comprehensive or land-use plan, state goals for comprehensive planning, a requirement for most general-purpose local jurisdictions to prepare and adopt comprehensive plans, and a requirement for the comprehensive plans of most general-purpose local jurisdictions to be consistent with one or more state or regional plans; 11 states have guidelines for a statewide comprehensive or land-use plan, 12 states have statutes that include state goals for comprehensive planning, and just 10 states have statutes that require the comprehensive plans of most local jurisdictions to be consistent with one or more state or regional plans. In the absence of state-enabling legislation, such as in Colorado, planning organizations such as DRCOG still may create regional plans but cannot require their member jurisdictions to comply with regional goals or policies (APA, n.d.).

Regional Centers and technical assistance facilitate regional planning

While regional centers and technical assistance programs are being carried out at organizations with plan review and consistency authority, they also help to encourage regional planning efforts in the absence of additional responsibilities from the state. Each of the organizations in this case study offered technical assistance programs (though DRCOG's program does not directly address housing and is in a pilot phase). For organizations that perform plan review or in the case of SANDAG have a binding RHNA, technical assistance can bolster their other efforts. In the case of DRCOG, where there are no statutes requiring plan review or consistency with regional plans, technical assistance can allow regional organizations to participate in local planning

efforts. DRCOG's pilot technical assistance program encourages localities to look back at past plans to reexamine potential transportation and land use connections. While this program is not geared toward housing and DRCOG does not require localities to comply with its regional vision through the technical assistance program, it does encourage greater involvement and coordination between DRCOG and its member jurisdictions. This is similarly true of the regional centers approach taken by both PSRC and DRCOG. While not solely focused on housing, regional centers are locations with a mix of housing, jobs, retail, services, and other destinations (PSRC, 2018). A regional centers framework allows organizations to collaborate with localities and guide regional growth and planning. Though DRCOG does not direct funding toward regional centers, it fosters regional involvement in local planning efforts. Alternatively, PSRC's designated regional centers represent priority areas for PSRC's federal transportation funding (PSRC, 2018). In sum, regional centers frameworks and technical assistance programs provide incentives for the coordination of regional planning efforts. These incentives are helpful for MPOs and COGs both as part of a broader planning authority as well as in the absence of such authority.

Analysis

The activities of the three case studies presented can be better understood through a comparison with the organizations for the Twin Cities and Portland, Oregon areas, which have evolved into general-purpose regional governments. The Twin Cities' Metropolitan Council and Portland's Metro are the two multi-county regional governments in the country and are viewed as leaders in regional planning. First, the Metropolitan Council (commonly referred to as Met Council) functions as a regional government and MPO for the Minneapolis-St. Paul area. Notably, the Met Council administers the region's urban growth boundary and has the authority to review housing elements of localities plans under Minnesota's Metropolitan Land Planning Act. This includes ensuring localities' comprehensive plans include an identification of existing housing needs, a discussion of how the land use plan addresses the future housing need for forecasted growth, and an implementation program that considers what tools a community will use to address its housing needs (Metropolitan Council, n.d.). Met Council also has a housing and redevelopment authority that supports affordable housing in nearly 100 cities. Additionally, the Met Council has

a Livable Communities grant program that supports policy development, Transit-Oriented Development, affordable housing, and affordable home ownership. Importantly, these funds are only available to communities that work with the Met Council to establish goals for affordable and lifecycle housing (Livable Communities Grants, n.d.). This program allows the Met Council to leverage funds to encourage communities to go beyond state requirements and respond to emerging needs. Therefore, the Met Council is a successful regional planning actor both because of Minnesota's law enabling significant plan review as well as its use of funding to incentivize equitable housing development.

Second, Portland's Metro government manages several regional services but most pertinent is its role in forecasting growth needs and administering Portland's urban growth boundary. Every six years, Portland's Metro Council looks at growth forecasts and development trends and decides whether to expand the boundary. This process includes a housing needs assessment for the area (Metro, 2018). Notably, Metro does not perform plan review for its member jurisdictions; rather the Oregon Department of Land Conservation and Development performs Periodic Review to ensure plans are "updated to respond to changes in local, regional and state conditions, coordinated with other comprehensive plans and investments; and in compliance with the statewide planning goals, statutes and rules" (Oregon Department of Land Conservation and Development, n.d.). Lastly, Metro has an affordable housing bond program funded by a 2018 ballot initiative. The bond program supports local cities and counties in creating new affordable housing and providing supportive housing services. In sum, Metro does not perform traditional plan review, but its urban growth assessment and housing funds allow it to play a significant role in regional housing planning.

Considering the examples of Portland and the Twin Cities, the case studies presented can be understood as evolving and expanding their roles in regional housing planning. Notably, both Met Council and Metro manage their region's urban growth boundary; the existence of an urban growth boundary provides an additional need for regional planning and justifies giving regional agencies planning authority. Significantly, DRCOG has a *voluntary* growth boundary that relies on local buy-in and it has expanded over time ("Do Urban Growth Boundaries Work to Prevent Sprawl?," n.d.). A binding growth boundary may help to bolster regional planning activities and provide an impetus for broadening regional authority. Lastly, both Metro and Met Council levy taxes on residents of their region to support programs, such as housing development (Metro, n.d.;

Metropolitan Council, 2022). This provides an additional source of revenue to support regional planning activity and is a contrast with the limited funding opportunities for MPOs and COGs. While Metro and Met Council are general-purpose governments, DRCOG, PSRC, and SANDAG are still largely defined by their roles as MPOs/COGs.

Opportunities for Future Regional Housing Planning

Looking to the future, MPOs and COGs are exploring opportunities to expand regional planning and capacity. For instance, in interviews, planners from DRCOG noted its board has taken an interest in housing planning and developing a housing strategy or needs assessment. Additionally, Colorado may expand the responsibilities of regional planning commissions. Currently, only ten states have laws requiring local plans to be consistent with regional or state plans, though additional states may be exploring new legislation in an attempt to ameliorate housing supply and affordability challenges. However, even in the absence of legislation enabling regional planning authority, MPOs and COGs can use incentives to encourage member jurisdictions to comply with regional plans. This may include the creation of new funding opportunities only available to jurisdictions that adopt specific goals or policies similar to the Met Council's Livable Communities grant program. Of course, these programs require additional funding and the case studies examined are largely dependent on federal and state funds – and federal funds for MPOs are limited to transportation planning. Therefore, another opportunity to expand regional planning activity would be to remove the funding constraints separating transportation, land use, and housing planning. These federal policy siloes also create overlap and competition across cities, counties, and states. Alternatively, MPOs/COGs could distribute LIHTC and CDBG funds, rather than states or localities.

Conclusion

This case study expands on the existing body of research on regionalism in planning and the need for regional organizations to take a greater role in housing planning. With a focus on the second wave of MPOs and COGs that are expanding their roles in housing planning, these organizations offer insight into the future of regional planning in the U.S. While it is hard to evaluate the success of regional housing planning, it is clear that localities alone are not

sufficiently managing housing needs. As the housing supply and affordability crisis continues, more states may turn to MPOs and COGs to lead regional housing planning.

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