

Third, since housing is affected by the interplay of a number of different federally assisted programs, the various Federal agencies involved should act jointly to issue a comprehensive regulation requiring the State or the affected community to furnish an overall plan as to how the combination of programs under consideration for Federal funding will contribute toward eliminating and preventing community patterns of racial segregation in housing. As presently administered, each such federally assisted program is independent and the requirements for compliance are different—sometimes even conflicting. Insofar as these programs affect housing, it would seem reasonable and logical for all concerned Federal agencies to strive toward a mutual objective, and to coordinate enforcement of such a comprehensive regulation.

Last, neither housing discrimination nor the many other problems of urban development can be solved effectively within the confines of community jurisdictional boundaries. As described by the HHFA:

"No community is an island unto itself. Its economy is tied in with the economy of the area of which it is a part. This applies to communities in metropolitan areas as well as to those in agricultural or rural areas. Transportation, water resources, waste disposal, air pollution, police and fire protection, and even slums and blight have no respect for jurisdictional boundaries. It is wasteful to consider them on a piecemeal basis. It is, therefore, an appropriate exercise of local responsibility under its workable program for each community to participate in planning and in solving common problems with its neighboring jurisdictions where possible, and to foster the formation of planning agencies that can operate on an areawide or regional basis * * *. Also, some communities are authorized by State law to extend their planning jurisdiction into the unincorporated areas beyond their limits and to exercise certain controls over such areas.

"Not only are metropolitan areas and regional planning agencies eligible for grants under the urban planning assistance program, but the HHFA Administrator is directed under this program to 'encourage cooperation in preparing and carrying out plans among all interested municipalities, political subdivisions, public agencies, and other parties in order to achieve coordinated development of entire areas.' " ¹³

Existing community patterns of housing segregation will yield most readily to regional planning of this broad perspective. Insofar as federally assisted programs affecting housing transcend jurisdictional boundaries, title VI should be construed to affirmatively require that the elimination of housing segregation be made part of such comprehensive regional planning.

Citizen participation

"A successful long-term workable program depends in large measure upon active participation by local citizens. Every citizen benefits in some degree from the program and every citizen has something to contribute to it. The citizen participation requirement of the workable program provides a means whereby citizens can come to understand the program benefits and can make a positive contribution so that a program can be planned and carried out to meet their needs and command their support * * *.

"Experience has demonstrated that effective citizen participation over the extended period necessary to carry out a successful workable program is based on an active citizens advisory committee that is communitywide and representative in scope, officially designated by the mayor and/or council, in accordance with local custom. The designation of such a committee is a workable program requirement. Also because of the almost universal difficulty in communities over the country in making adequate housing available to minority groups, it is generally expected that there will be established a subcommittee or special committee on minority group housing. Both the overall advisory committee and the minority group subcommittee or special committee should have minority group representation." ¹⁴

Recognizing as it does "the almost universal difficulty in communities over the country in making adequate housing available to minority groups," the suggestion of a citizens advisory committee would seem particularly appropriate to help develop objectives and goals in community planning for housing desegregation. Therefore, any comprehensive plan for federally assisted urban development and renewal should provide for a citizens advisory committee with adequate minority representation. Similarly, where several Federal agencies in-

¹³ *Ibid.*, pp. 4-5.

¹⁴ Workable program for community improvement, program guide No. 7 "Answers on Citizen Participation," p. 1, November 1964, HHFA.