Partnership for Sustainable Communities

A YEAR OF PROGRESS FOR AMERICAN COMMUNITIES
When it comes to housing, environmental, and transportation policy, the federal government must speak with one voice.

—Secretary Shaun Donovan
U.S. Department of Housing and Urban Development

Livability means being able to take your kids to school, go to work, see a doctor, drop by the grocery or post office, go out to dinner and a movie, and play with your kids at the park, all without having to get into your car. Livability means building the communities that help Americans live the lives they want to live—whether those communities are urban centers, small towns, or rural areas.

—Secretary Ray LaHood
U.S. Department of Transportation

Well-conceived, effectively implemented environmental protection is good for economic growth…. A clean, green, healthy community is a better place to buy a home and raise a family; it’s more competitive in the race to attract new businesses; and it has the foundations it needs for prosperity.

—Administrator Lisa P. Jackson
U.S. Environmental Protection Agency
Sustainable Communities: A Response to Today’s Challenges

One of our country’s most pressing goals is to build an economy that provides good jobs now—and that creates a strong foundation for enduring prosperity. To accelerate job growth for this and future generations, that foundation must be built with expanded housing and transportation choices, greater energy independence, and better protection for our clean air and water. These issues are closely related and should not be tackled as separate challenges. We can achieve our economic, social, and environmental goals most effectively when we work on them together.

Sustainable communities are places that balance their economic and natural assets so that the diverse needs of local residents can be met now and in the future. Typically, these communities have lower costs for consumers and more value for taxpayers because they are more connected and efficient.

Sustainable communities provide economic momentum and help America compete more effectively for jobs. Regions all around the country recognize this and are enthusiastically planning for them based on their own local resources, landscape, culture, and ingenuity. The Partnership for Sustainable Communities, one of the Obama Administration’s signature urban policy initiatives, is enabling these regions to accelerate those plans and to jump-start private investment and implementation.

Ultimately, this approach will make communities more prosperous by making them more attractive places for businesses to locate and for young people to remain or move to. Sustainable communities allow people to live closer to jobs and save money on personal transportation, usually the second largest household expense and sometimes the largest for low-income Americans. Neighborhoods that make it easy to walk or bike to work, school, stores, parks, and other destinations help people stay healthy by incorporating regular exercise into their daily routines. Sustainable communities also reduce air and water pollution and protect treasured landscapes and prime agricultural land.

People want to live in these types of places—in fact, right now, the demand for these neighborhoods far outstrips the supply. And that demand is expected to grow—the United States is in the midst of a demographic shift that is changing the nation’s housing preferences and development patterns. The two largest demographic segments—millennials, who are entering the workforce, and baby boomers, who are leaving it—are most interested in walkable neighborhoods that offer a variety of housing choices, convenient transportation options, shopping, restaurants, parks, and cultural amenities.
A New Federal Approach

On June 16, 2009, U.S. Secretary of Transportation Ray LaHood, U.S. Secretary of Housing and Urban Development Shaun Donovan, and U.S. Environmental Protection Agency Administrator Lisa P. Jackson announced that they were forming the interagency Partnership for Sustainable Communities. This action marked a fundamental shift in the way the federal government structures its transportation, housing, and environmental spending, policies, and programs. The three agencies agreed to collaborate to help communities become economically strong and environmentally sustainable. Rebuilding national prosperity today and for the long run starts with individual communities where—now and generations from now—all Americans can find good jobs, good homes, and a good life.

Through the Partnership and guided by six Livability Principles (see below), the Department of Housing and Urban Development (HUD), the Department of Transportation (DOT), and the Environmental Protection Agency (EPA) are coordinating investments and aligning policies to support communities that want to give

HUD–DOT–EPA PARTNERSHIP FOR SUSTAINABLE COMMUNITIES
GUIDING LIVABILITY PRINCIPLES

Provide more transportation choices. Develop safe, reliable, and economical transportation choices to decrease household transportation costs, reduce our nation’s dependence on foreign oil, improve air quality, reduce greenhouse gas emissions, and promote public health.

Promote equitable, affordable housing. Expand location- and energy-efficient housing choices for people of all ages, incomes, races, and ethnicities to increase mobility and lower the combined cost of housing and transportation.

Enhance economic competitiveness. Improve economic competitiveness through reliable and timely access to employment centers, educational opportunities, services and other basic needs by workers, as well as expanded business access to markets.

Support existing communities. Target federal funding toward existing communities—through strategies like transit-oriented, mixed-use development and land recycling—to increase community revitalization and the efficiency of public works investments and safeguard rural landscapes.

Coordinate and leverage federal policies and investment. Align federal policies and funding to remove barriers to collaboration, leverage funding, and increase the accountability and effectiveness of all levels of government to plan for future growth, including making smart energy choices such as locally generated renewable energy.

Value communities and neighborhoods. Enhance the unique characteristics of all communities by investing in healthy, safe, and walkable neighborhoods—rural, urban, or suburban.
By working together, [HUD, DOT, and EPA] can make sure that when it comes to development—housing, transportation, energy efficiency—these things aren’t mutually exclusive; they go hand in hand. And that means making sure that affordable housing exists in close proximity to jobs and transportation. That means encouraging shorter travel times and lower travel costs. It means safer, greener, more livable communities.

--President Barack Obama

Americans more housing choices, make transportation systems more efficient and reliable, reinforce existing investments, and support vibrant and healthy neighborhoods that attract businesses. Each agency is working to incorporate the principles into its funding programs, policies, and future legislative proposals.

The Partnership breaks down the traditional silos of housing, transportation, and environmental policy to consider these issues as they exist in the real world—inextricably connected. In the past, the federal government has too often operated as if these areas were unrelated. The old approach has proven to be ineffective, costly, complicated, and inconsistent. Not only does interagency collaboration get better results for communities—such as making it easier to build affordable housing that is convenient to a range of job opportunities and transportation choices—it also uses taxpayer money more efficiently. Coordinating federal investments in infrastructure, facilities, and services meets multiple economic, environmental, and community objectives with each dollar spent. For example, investing in public transit can lower transportation costs, reduce greenhouse gas emissions and other air pollution, decrease traffic congestion, encourage healthy walking and bicycling, and spur development of new homes and amenities around transit stations.

Agencies throughout the federal government are realizing the value of this new model of collaboration. Together or individually, HUD, DOT, and EPA are also working with the Centers for Disease Control and Prevention, the Department of Agriculture, the Department of Defense, the Department of Education, the Department of Energy, the Department of Health and Human Services, the Economic Development Administration, the Federal Emergency Management Agency, the General Services Administration, the National Endowment for the Arts, the National Oceanic and Atmospheric Administration, and other federal agencies on related issues.

Parks, open space, and recreational opportunities make communities more attractive and help keep residents healthy by giving them places like Gasworks Park in Seattle to exercise, play, or just relax.
The Partnership’s First Year: June 2009–June 2010
More Effective Federal Investments, Better Outcomes for Communities

In its first year, the Partnership for Sustainable Communities made strides toward three goals:

- Targeting resources through grants and other programs to help states and communities create jobs and stronger economies by developing more sustainably.
- Removing regulatory and policy barriers at the federal level to make it easier for state and local governments to access federal services and resources.
- Aligning agency priorities and embedding the Livability Principles in each agency’s actions so that transportation, housing, and environmental protection efforts are coordinated.

TARGETING RESOURCES TO COMMUNITIES

Communities across the country are eager to build more sustainable neighborhoods. Some have projects ready to go but lack the funds to put shovels in the ground; others have citizens and local leaders who are excited about planning a sustainable future but need help taking the next step to translate their ideas into actual development. In response to those needs, the Partnership for Sustainable Communities has focused on getting resources to communities so they can turn their visions into reality.

Transportation Investment Generating Economic Recovery (TIGER) Grants

In February 2010, as part of the American Recovery and Reinvestment Act, DOT announced $1.5 billion in TIGER grants for more than 50 innovative transportation projects across the country. Twenty-two of these projects were selected because they would promote livability by increasing transportation choice, providing better access to job opportunities, strengthening economic resiliency, and protecting air and water quality. As part of the continuing coordination under the Partnership, DOT used EPA and HUD’s expertise in its application review to select projects that would achieve multiple benefits.

Now urban, suburban, and rural communities across the nation are getting ready for the exciting improvements TIGER grant money will bring. For example, TIGER will fund a new streetcar loop linking downtown New Orleans with other transit services and an Amtrak hub.

In Revere, Massachusetts, TIGER funding will be used to turn acres of dilapidated parking lots into a bus and rail station with pedestrian access to the adjacent Wonderland neighborhood, site of America’s first public beach. Grant money

Downtown Boise, Idaho, is welcoming to bicyclists, pedestrians, drivers, and transit users. It has many historic buildings that have seen new life with renovation and reuse.
will also support Whitefish, Montana’s plan to improve vitality on its main street and maintain a pedestrian-friendly streetscape, balanced with the need to move significant volumes of traffic.

**Joint DOT TIGER II-HUD Community Challenge Grants**

For the first time, DOT and HUD will join forces to award up to $75 million—up to $35 million in transportation planning grants from the second round of TIGER funds and $40 million in HUD Community Challenge Planning Grants to support local planning activities that integrate transportation, housing, and economic development. To make it easier for communities to apply to both programs, DOT and HUD accepted a single application for both opportunities and will make joint awards as well as individual grants in the fall of 2010. The three agencies collaborated on the joint proposal and will review applications together.

**HUD Sustainable Communities Regional Planning Grants**

In June 2010, HUD opened the application process for the $100-million Sustainable Communities Regional Planning Grant program. This program will support metropolitan and multijurisdictional planning efforts that integrate housing, land use, economic and workforce development, transportation, and infrastructure investments. With strong, comprehensive, long-range regional plans, communities can better address the interdependent challenges of economic competitiveness and revitalization, social equity and access to opportunity, public health, energy efficiency,

---

**SUSTAINABLE COMMUNITIES TOUR**

In September 2009, Administrator Jackson, Secretary LaHood, Secretary Donovan, and White House Urban Affairs Director Adolfo Carrión embarked on a Sustainable Communities Tour, visiting Chicago, Dubuque, and Denver to hear from leaders on the ground about ways the Partnership could help communities create more economic opportunities and affordable homes while protecting their air and water. They talked with state, regional, and local officials and held community forums to hear from the public. The agency leaders visited several projects that exemplify the types of places the Partnership wants to support:

- **Chicago’s Bethel Center** is a new community services hub in a green building on a former brownfield. It is located next to a train station and has affordable homes nearby.
- **Dubuque, Iowa**, is transforming its historic Millwork District into a sustainable neighborhood with a mix of uses, housing options for a range of income levels, transportation options, and infrastructure improvements.
- **Denver** has refurbished its historic Union Station to make it a multimodal transit hub that has helped revitalize the surrounding area. Also in Denver, South Lincoln Park Homes built new affordable housing on a former brownfield near a transit station.

---

The public investment in Denver’s Union Station spurred private investment nearby.
environmental protection, and climate change. The Partnership agencies collaborated on the development of the proposal and will jointly review applications. Funding announcements will be made in the fall of 2010.

**Funds for Urban Circulator and Bus & Bus Livability Projects**

In July 2010, DOT awarded nearly $300 million under two new programs that will give Americans better transportation choices and strengthen communities. Six cities were selected for Urban Circulator grants, which will fund streetcar, bus, and other urban transportation projects that connect destinations and foster walkable, mixed-use redevelopment. For example, the award will help Cincinnati construct a 6-mile streetcar route that will connect its downtown to Over-the-Rhine, a low-income neighborhood, and to Uptown, the region’s second largest employment center.

Bus & Bus Livability grants went to 47 projects in 31 states that will improve bus service and facilities, encouraging development around public transit and giving bus riders better access to jobs, health care, and education. Funded projects include a bike and pedestrian trail connecting downtown destinations to a bus and commuter rail hub in Orlando; a real-time bus-tracking system in Montrose, Colorado; and New York City’s 34th Street Transitway, which will add bus lanes and a pedestrian plaza to the busy corridor, easing traffic congestion, improving bus service, and enhancing pedestrian safety.

**State Revolving Funds for Water Infrastructure**

The single largest category of funds that flow from EPA to states and ultimately local communities is funding for water infrastructure projects, also known as State Revolving Funds (SRFs). In May 2010, EPA issued guidance to states on spending the 2010 appropriation of $3.3 billion for clean water and drinking water infrastructure. The guidance explicitly recommends that states make funding decisions that are consistent with the Livability Principles, and that they discourage expanding infrastructure to accommodate growth if there are available facilities in existing communities. Three states—Maryland, New York, and California—are now testing how the billions they receive in Clean Water SRF dollars can support their efforts to make communities more sustainable.

**Smart Growth Implementation Assistance**

EPA has engaged HUD and DOT in its Smart Growth Implementation Assistance (SGIA) program, which provides direct technical assistance to three to five communities selected each year through a competition. Over the last five years, this program has worked with urban, suburban, and rural communities across the country on issues such as stormwater management, code revision, transit-oriented development, affordable housing, infill development, corridor planning, green building, and climate change. In addition to helping communities directly, the SGIA program helps EPA, HUD, and DOT learn more about the challenges that communities around the country face as they strive to create places that provide transportation and housing choices while protecting environmental resources. Reports from these projects often provide new tools for other communities to use. In the first year of the Partnership, the agencies worked together on SGIA projects with the state of California; Louisville, Kentucky; Montgomery County, Maryland; and Las Cruces, New Mexico. The next round of selected communities will be announced in fall of 2010.
Greening America’s Capitals

This new EPA-led Partnership project will help up to five state capital cities per year develop a vision of distinctive, environmentally friendly neighborhoods that incorporate innovative green building and green infrastructure. EPA will fund a team of designers to visit each city and work with residents and local leaders to produce designs for a demonstration neighborhood that can catalyze or complement a larger planning process. HUD and DOT will also bring their expertise to these teams. Each project will involve city staff as well as staff from the state legislature and governor’s office. The cities selected in 2010 will be announced in the fall.

HUD Adoption of Sustainability Criteria in Scoring Grant Applications

Secretary Donovan announced in May 2010 that HUD will adopt the Leadership in Energy and Environmental Design for Neighborhood Development (LEED-ND) system to evaluate applications for its $3.25 billion in discretionary funding. Funded by EPA and developed by the U.S. Green Building Council, the Natural Resources Defense Council, and the Congress for the New Urbanism, LEED-ND is a system for rating and certifying neighborhoods that integrate housing with jobs and services, offer a range of transportation choices, and incorporate green building and green infrastructure. With this change, grant applications that emphasize sustainable communities can be awarded additional points.

Mixed-Income, Transit-Oriented Development Action Guide

The Federal Transit Administration (FTA) and HUD have developed an action guide to help planners implement mixed-income, transit-oriented development. This interactive Web guide, www.mitod.org, will help local planners and community groups find effective strategies and tools to encourage mixed-income development around transit.
Executive Order on Federal Leadership in Environmental, Energy, and Economic Performance

President Obama’s Executive Order 13514, signed on October 5, 2009, aims to make federal government facilities more sustainable and to encourage the federal government to lead by example in using resources more efficiently. EO 13514 requires agencies to reduce their greenhouse gas emissions, make their buildings more energy efficient, and work with communities to site federal buildings in downtowns, near transit and affordable housing, and with easy access on foot or by bike. Because the location of federal facilities can influence communities’ development patterns for decades, the three Partnership agencies worked with the General Services Administration and consulted with the Department of Defense and the Department of Homeland Security to develop siting recommendations that will make future federal facilities assets to communities and catalysts for better development.

Brownfields Policy Change

HUD revised its policies to make it easier to develop Federal Housing Administration-insured multifamily housing on cleaned-up former industrial and commercial sites, known as brownfields, while ensuring the health and safety of future residents. This change makes it easier for communities to build homes that working people can afford on reused sites that are near key amenities, such as public transit. Redeveloping sites like these can revitalize entire neighborhoods, providing new jobs, stores, and services.

Brownfields Pilot Communities

EPA, HUD, and DOT have selected five pilot communities—Boston; Indianapolis; Iowa City, Iowa; Denver; and National City, California—where there is a convergence of multiple brownfield sites, economic distress, public transit, and the need for affordable housing. The three agencies are helping these communities clean up and reuse contaminated and vacant properties, which will provide new sustainable housing and transportation choices, create jobs, and expand economic opportunity. EPA, HUD, and DOT will use lessons learned from the pilots to identify barriers and find opportunities for program and policy changes that will make federal investments more effective in economically distressed places.

Small towns and rural areas face major obstacles to plan and implement strategies that increase livability. Therefore, I’m very pleased to see the federal government’s new focus on incentive-based funding and technical assistance for rural areas.

—Julia Gouge, President, Board of Commissioners, Carroll County, Maryland
In National City, for example, the three agencies are supporting the efforts of the local redevelopment authority and neighborhood organizations to revitalize a brownfield site in the Westside neighborhood, a low-income, heavily polluted area. The Partnership’s assistance will help the city clean up the site, link it to an adjacent light rail station, develop 201 units of affordable housing, improve the nearby tidal creek, and create a much-needed park for local families.

Brownfields Area-Wide Planning Pilot Initiative

In collaboration with HUD, DOT, and other agencies, EPA’s Brownfields Area-Wide Planning Pilot initiative will work with about 20 communities to help each one create a shared vision for brownfields redevelopment that will inform cleanup decisions. The pilots will demonstrate how brownfield reuse can clean up health hazards, create new economic opportunities, and bring new life to disadvantaged communities. Recipients will be announced in fall of 2010.
Policy Statement on Bicycle and Pedestrian Accommodation Regulations and Recommendations

DOT has issued a new bicycle-pedestrian policy that emphasizes the need to consider non-motorists in federally funded road projects, discourages transportation investments that jeopardize the safety of cyclists and pedestrians, and encourages investments that go beyond minimum requirements and provide facilities for bicyclists and pedestrians of all ages and abilities. The department has also proposed emphasizing its policy that extends FTA funding to pedestrian and bicycle improvements within a designated area around a transit stop.

Reducing Contracting Conflicts

The Federal Highway Administration (FHWA) worked with HUD to resolve a contracting conflict that had the potential to hold up projects. FHWA will use Special Experimental Project No. 14 (SEP-14) to permit, on a case-by-case basis, the application of HUD contracting requirements on federal-aid highway projects. This will allow better coordination of transportation and housing expenditures because HUD and FHWA requirements were often in conflict.

“...It is important that these federal agencies work together as these issues are all interconnected. From the local perspective, this cross-disciplinary partnership is an important, all-encompassing approach, which will make our lives easier by giving us access to more resources and streamlining the process.”

—Mark Stodola, Mayor, Little Rock, Arkansas
conflict. For example, HUD’s Section 3 Program requires that low-income people living in a project area be hired as a condition of funding that project, which conflicts with FHWA rules that prohibit geographic hiring preferences. FHWA’s action will make it easier for communities to build the infrastructure they need and will generate jobs for these communities.

**Change to Federal Transit Administration’s New Starts Program**

FTA’s New Starts program funds locally planned, implemented, and operated rail and bus projects. In January 2010, DOT changed a rule that had required the New Starts program to consider cost-effectiveness above all other factors when selecting major transit projects to support. Building on this policy shift, in June 2010, FTA asked for public comment on how to change the way proposed New Starts projects are rated and evaluated. FTA is now reviewing the comments as it develops new ways to define and measure statutory program criteria to evaluate major transit project proposals. Changes will give meaningful consideration to a broader range of benefits transit can provide, including economic development, a healthier environment, and increased access to opportunities.

---

**JACKSONVILLE, FLORIDA**

EPA’s Environmental Justice Showcase Communities program convenes federal agencies, state and local government entities, non-governmental organizations, and other stakeholders to help underserved communities shape their neighborhoods’ futures with comprehensive, locally appropriate solutions. As one of ten Environmental Justice Showcase Communities, Jacksonville is receiving assistance from the Partnership agencies to help address local environmental, health, and economic challenges. EPA, HUD, and DOT representatives participated in the Jacksonville project’s kickoff event, where they toured the northeastern part of the city, a disadvantaged area with several Superfund and brownfield sites and high rates of heart disease, cancer, diabetes, asthma, and infant mortality. The agencies will support the local partners as they establish a community health center, designed with green building techniques, on a cleaned-up brownfield site close to parks, community gardens, and other amenities. The center will provide training for health care jobs in partnership with historically black colleges and universities and will offer educational programs on healthy living. The lessons learned through this and other Environmental Justice Showcase Communities pilots will help the Partnership better use its resources to help underserved communities build more sustainable neighborhoods with better access to opportunities; improved services and amenities; and healthier places to live, work, and play.
ALIGNING POLICIES AND BUDGETS

To make the Livability Principles a part of the way the three agencies do business and to ensure ongoing collaboration, HUD, DOT, and EPA have been working to align their respective programs, policies, and budgets.

Coordinating Policies and Funding Programs

The three agencies have been working together in unprecedented ways to promote sustainable communities through their policies and grant programs. They have jointly evaluated applications for the TIGER, Brownfields Area-Wide Planning Pilot, Sustainable Communities Regional Planning, and Community Challenge Planning grants, among others. They have collaborated on regulatory and policy changes such as HUD’s brownfields policy change, DOT’s bicycle–pedestrian funding policy changes, and recommendations for federal facility siting.

HUD Office of Sustainable Housing and Communities

In February 2010, HUD launched the Office of Sustainable Housing and Communities to serve as the center point for HUD’s sustainability efforts and the main liaison to the Partnership. The Office of Sustainable Housing and Communities will support stronger, more sustainable communities by advancing policies that connect housing to jobs, foster local innovation, and support a clean energy economy.

EPA Office of Sustainable Communities

In February 2010, EPA announced that the Office of Sustainable Communities would be created to coordinate the agency’s work on smart growth and green building. The office will provide technical assistance to urban, suburban, and rural communities in support of the Partnership and will work with a wide range of stakeholders to produce research, tools, and other resources to help communities create sustainable neighborhoods.

Regional Partnerships

The national Partnership for Sustainable Communities is being replicated by field staff in the three agencies’ regional offices around the country. Regional HUD, DOT, and EPA staff are collaborating on a variety of projects. For example, regional HUD, FTA, and EPA staff met with Tucson leaders to kick off the Tucson Modern Streetcar Project, a TIGER grant recipient. They toured the corridor and explored opportunities to connect the streetcar project to other local public investments, such as brownfield cleanups and housing and small business development along the corridor.

“...The smallest municipalities are connecting to federal agencies, which has not happened in a coordinated fashion, not just on Long Island but any suburban area in the nation.... This new federal partnership could provide the resources necessary to assist the revitalization of our downtowns and support needed sewer and transit infrastructure.”

—Eric Alexander, Executive Director, Vision Long Island
The Road Ahead:
The Partnership’s Plans for the Future

The Partnership for Sustainable Communities has already yielded impressive results—but HUD, DOT, and EPA still have a lot of work to do together. The agencies plan to continue working with other interested federal partners to help them better support communities that offer more job opportunities, better housing choices, reliable and convenient transportation options, and high quality of life.

For example, to better support economic growth and community development in rural areas, the Partnership is working with the U.S. Department of Agriculture (USDA). The agencies are discussing how to facilitate future technical assistance collaborations, how the Livability Principles support USDA programs to improve economic opportunity and quality of life in rural America, and how best to address rural issues in the Partnership’s work. This collaboration builds on work EPA has done with USDA’s Rural Development Program, including providing smart growth assistance to the town of Waverly, Iowa, which was damaged by floods and tornadoes in 2008.

The Partnership is also exploring ways to work with the Federal Emergency Management Agency (FEMA) to incorporate sustainable communities practices into hazard mitigation planning and long-term disaster recovery. This potential collaboration stems from work between EPA and FEMA to help six Iowa towns that were damaged by floods and tornadoes in 2008 and a Memorandum of Understanding between these two agencies. This work is also helping to inform a federal task force working on a national strategy for climate adaptation, and it could be used to help local climate change adaptation planning as well.

The Partnership plans to continue examining and, if necessary, modifying federal policies and actions on transportation, housing, and environmental protection to complement each other and to better reflect the Livability Principles. In addition, the Partnership will screen these policies and actions to ensure they provide equal opportunities to disadvantaged communities, including rural and tribal areas. The Partnership will make sure our programs are fair and inclusive. The Partnership for Sustainable Communities recognizes that effective decision-making about how and where growth occurs depends on understanding and properly addressing the unique needs of different socioeconomic groups. We will ensure the full and fair participation in our activities and programs by all potentially affected communities.
Office of Sustainable Communities (1807T)
EPA 231-K-10-002
http://www.epa.gov/smartgrowth
October 2010

Photos on front cover (from left to right): Boise, Idaho; Kentlands, Gaithersburg, Maryland; Washington, Virginia; Salt Lake City, Utah; Philadelphia, Pennsylvania.

Photos on back cover (from left to right): Starkville, Mississippi; Vermont; Millennium Park, Chicago; Stapleton, Denver, Colorado; Providence, Rhode Island.