

In Pursuit of a Just Region:
The Vision, Reality and Implications of the Sustainable Communities Initiative

DISSERTATION

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Abstract

The planning field has a long history of intersecting with, contributing to and addressing issues of social, racial and geographic equity, from the late 19th century work of Jacob Riis and Jane Addams to contemporary movements such as progressive regionalism and environmental justice. Planning has had a conflicted history in engaging issues of equity and racial or social inclusion, with the profession at times being at the forefront of social justice issues, and at others acting as an accomplice in many of the most discriminatory urban policies in 20th century American history. While planning has often served the needs of marginalized groups, racial discrimination has been interwoven with various aspects of planning practice and policy throughout the 20th century.

The model of sustainable development, which has become dominant in planning practice in the past two decades, presents a vision for balancing economic development, environmental protection and social equity, known as the three “e’s” of sustainable development. By the late 2000s the principles of sustainability have made their way into the thinking of many federal agencies. The Department of Housing and Urban Development’s Sustainable Communities’ Initiative (SCI), introduced by the Obama Administration, sought to take these principles and translate them to practice at a scale not previously attempted in the United States.

HUD invested more than \$200 million in seventy- four regions across the U.S. who received three- year regional sustainable development planning grants. The planning

initiatives were intended to better coordinate housing and transportation while supporting more sustainable and equitable land use, infrastructure, and zoning decisions. SCI included a strong equity and fair housing mandate, introduced new equity planning and fair housing tools, and provided extensive support for equity planning in the program.

My research examines the experience of forty- five regional planning grantees awarded SCI grants in 2010. This research is a formative program evaluation of the SCI. This research seeks to understand if the SCI's effort to affirmatively further fair housing and support regional equity led to stronger equity outcomes in regional sustainability planning processes and plans.

Utilizing a mixed-methods approach integrating plan evaluation and thematic analysis of documents, I find that equity planning efforts in the SCI fostered a stronger equity component to regional sustainability plans. For some regions, SCI was transformational in fostering new understandings and approaches to supporting equity planning, although the depth of the equity component of the planning process and plan recommendations varied substantially between grantees within the 2010 cohort of grantees.

The SCI experience speaks to the potential benefits of stronger, more proactive federal support by HUD for equity planning. Despite this progress, serious concerns regarding the implementation of SCI linger. The communicative rational planning model of SCI has substantial shortcomings in implementing complex regional sustainability plans. I propose integration of the collective impact theory to address this shortcoming in existing theory and to foster more productive implementation of SCI plans.

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Fields of Study

Major Field: City and Regional Planning

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Chapter 1. Introduction

The planning field has a long history of intersecting with, contributing to and addressing issues of social, racial and geographic equity, from the late 19th century work of Jacob Riis and Jane Addams to contemporary movements such as progressive regionalism and environmental justice. Planning has had a conflicted history in engaging issues of equity and racial or social inclusion, with the profession at times being at the forefront of social justice issues, and at others acting as an accomplice in many of the most discriminatory urban policies in 20th century American history. While planning has often served the needs of marginalized groups, racial discrimination has been interwoven with various aspects of planning practice and policy throughout the 20th century (Cashin, 2004).

Analysis of both planning practice and theory illustrate that the conflict between technical pragmatism and advocacy was an ever-present challenge from the field's first professional conferences in 1909-1910, to the Civil Rights era of the 1960's and beyond (Peterson, 2009). The pinnacle of planning's embrace of equity concerns would emerge during the Civil Rights era with the rise of Advocacy Planning Theory. Advocacy planning, a dominant planning theory by the 1970's, placed social advocacy and equity at the forefront of planning policy and decision-making.

Advocacy Planning Theory informed practice and branched into other strands of theoretical development and planning practice. Additionally, planning would benefit from theoretical developments in other disciplines. This historical process of theoretical development and adaptation to practice has led to contemporary theories such as the “Just City” but also influenced many other aspects of theory and practice. The constant evolution of equity planning concepts illustrates the utility of the evolution of planning theory and the importance of refining theory through application in the real world.

Sustainable development models provide a contemporary example of a planning practice that has integrated social equity concerns. The model of sustainable development, which has become dominant in planning practice in the past two decades, presents a vision for balancing economic development, environmental protection and social equity, known as the three “e’s” of sustainable development (The Presidents Council, 1996). Although sustainable development presents a framework to resolve development conflicts in order to balance equity, environmental goals and economic development, many equity advocates are concerned that equity falls short in sustainability planning, becoming a subordinate goal to environmental and economic concerns.

At the beginning of the Obama Administration, many of these contemporary theoretical and practice- based advancements had made their way into the thinking of many federal agencies, particularly the U.S Department of Housing and Urban Development. The agency’s Sustainable Communities’ Initiative (SCI), introduced by the Obama

Administration as part of its economic recovery platform, sought to take equity theories and principles and translate them to practice at a scale not previously attempted in the United States.

The Obama Administration's interagency collaboration, *Partnership for Sustainable Communities*, was launched in June 2009, as a collaborative venture among the U.S. Department of Housing and Urban Development (HUD), the U.S. Environmental Protection Agency and the U.S. Department of Transportation. This collaborative entity was intended to coordinate the action of the three federal agencies and utilize federal funding to increase sustainability planning throughout the United States. HUD became the lead agency in the partnership, launching the HUD Sustainable Communities Regional Planning and Community Challenge grant program, a program which has funded nearly \$250 million in grants to more than 150 local planning agencies and consortiums (U.S. HUD, 2012).

Part of the HUD Sustainable Communities' Initiative grant program included regional planning grants. Regional planning grants were an unprecedented infusion of federal planning dollars directed to communities implementing sustainability initiatives and supporting three year regional planning efforts to support sustainable development. The grants were intended to better coordinate housing and transportation while supporting more sustainable and equitable land use, infrastructure, and zoning decisions.

The SCI program is grounded in the sustainable development principles and theoretically is a model of Communicative Rational Planning, but also infused with a pronounced equity component. The equity mandate included the intersection of equity and fair housing concerns in SCI planning principles, the development of regional equity strategies, robust community engagement with traditionally underrepresented groups, and the addition of a planning requirement to complete a Fair Housing Equity Assessment (FHEA). The FHEA was a three- part planning process, including regional deliberation, data- driven analysis and decision- making.

1.1. HUD's Conflicted History: Equity Planning and Fair Housing Prior to Obama

HUD has a contentious history with respect to the agency's ability to be proactive and highly engaged in a strong equity agenda (Weaver 1985, and Toussaint et al. 2015). HUD emerged during the Civil Rights era and was just several years old when the 1968 Fair Housing Act passed and the Kerner Commission report was published (Toussaint et al. 2015 and National Advisory Commission, 1968). The Commission's report argued for more active federal support in battling housing discrimination.

Expectations were high for the organization in its early years and the agency took a proactive (or aggressive) approach to fair housing enforcement in its first decade. Governor George Romney, HUD Secretary during the Nixon Administration, sought for the agency to have a strong role in fair housing regulation, particularly for communities receiving funds from the federal government (Reston, 2012). The HUD Secretary proposed

the “Open Communities” program that made receipt of HUD funding contingent upon communities allowing subsidized housing (Bonastia, 2006). The Secretary’s early activist stance would not last long, as the Nixon Administration pressured Secretary Romney to back down from this aggressive interpretation of the Fair Housing Act. Nixon’s displeasure with Romney’s affirmative stance of pushing for regional desegregation would lead to Secretary Romney’s early resignation from HUD (Bonastia, 2004).

Romney’s departure, Nixon’s policy decisions and the Reagan Administration would undermine HUD and the agency would languish. As described by Robert Weaver in *The First Twenty Years of HUD*:

“Beginning with the Nixon moratorium on subsidized housing in 1973, however, the department was weakened by a pattern of taking off in one direction and then changing quickly to another. In the process, ambitious innovations never had a chance to settle down and make adjustments as they went along. The department’s effectiveness and morale suffered. This atmosphere- after abating somewhat in the early Carter years-culminated with the Reagan administration’s dramatic redirection of housing and urban development policy. Drastic reduction in housing assistance, sustained de facto subsidies to non-poor homeowners, and cuts in federal housing credit and community development programs typify the Reagan approach.” (Weaver, 1985, Pg. 463)

During the Reagan Administration the agency would face severe budget cuts and ongoing scandal, with many high ranking HUD officials implicated in various forms of fraud (Labatan, 1993, and Janofsky, 1998). Market- based affordable housing reforms in the 70's and 80's, such as Housing Choice Vouchers and the inception of the Low Income Housing Tax Credit program (administered by the IRS), would undercut the agency's influence in affordable housing development. The agency would experience dramatic policy shifts in the 1990's, supporting the demolition of public housing and HOPE VI, and enacting the experimental mobility program Moving To Opportunity (MTO).

The agency would weather a number of lawsuits from Civil Rights advocates throughout its history due to its conflicted history of supporting fair housing. Litigation in Chicago (Gautreaux), Dallas (Walker), Boston (NAACP Boston Chapter), Yonkers (Giddins), Minneapolis (Hollman) and Baltimore (Thompson), and other prominent cases, would challenge the agency's history of segregating subsidized housing and compliance with the 1968 Fair Housing Act. More specifically, litigation would challenge HUD's compliance in meeting the Affirmatively Further Fair Housing (AFFH) obligation in the 1968 Fair Housing Act (Toussaint et al. 2015). Affirmatively Furthering Fair Housing (AFFH) is a statutory requirement that HUD and the agency's grantees affirmatively further the purpose of the Fair Housing Act.

Increased legal challenges from Civil Rights advocates in the 1990's were directly informed by scholarship developed by Betsy Julian and Michael Daniel (Toussaint et al.

2015). Julian and Daniel's article, *Separate and Unequal – The Root and Branch of Public Housing Segregation* published in *Clearinghouse Review* in 1989, would identify and disseminate a clear legal strategy to challenge patterns of segregation in HUD's public housing. This strategy would build upon case law to provide a blue print for utilizing the Affirmatively Further Fair Housing obligation to challenge the agency (Julian & Daniel, 1989). These cases spurred numerous small- scale housing mobility programs as remedial actions due to HUD's liability or as a negotiated outcome via consent decree (Toussaint et al. 2015).

The agency's challenges would continue in the George W. Bush Administration, which cut funding to HUD. Between 2004 and 2008, funding for low- income housing assistance was cut by \$2 billion, including more than \$700 million in cuts to tenant- based and project- based Section 8, and more than \$1 billion in cuts to HOME and Public Housing (Rice & Sard, 2009). The agency would see additional scandal with Bush appointee Secretary Jackson resigning early due to criminal investigation (Schulte, 2008). These challenges to the agency would come at a time of crisis for housing in the United States. At the close of President George W. Bush's second term, rapidly escalating foreclosures would produce a national housing crisis, which would eventually impact U.S. and global economies.

1.2. The Obama Administration: Crisis and Opportunity for Innovation

In 2009, when the Obama Administration began, the nation was in a deep recession and facing a housing and foreclosure crisis at a scale not experienced since the Great

Depression. The subprime lending crisis produced widespread housing instability, with 2.8 million foreclosures in 2009, and more than 1 in 4 homeowners underwater on their mortgages, nationally (Simon & Hagerty, 2009). National unemployment rates in 2009 would reach 10% and a national recession produced millions of job losses (Goldman, 2009). State budget deficits would cumulatively total more than \$100 billion dollars (National Conference of State Legislatures, 2009). The Obama Administration would enter office during a period of great anxiety and economic challenge. As described by President Obama in 2009:

“We start 2009 in the midst of a crisis unlike any we have seen in our lifetime, a crisis that has only deepened over the last few weeks...many, many Americans are both anxious and uncertain of what the future will hold.” (Obama, 2009a)

The early months of the Obama Administration focused on addressing the economic crisis, with the passage of the American Recovery and Reinvestment Act (ARRA) of 2009, an economic stimulus bill of nearly \$800 billion. ARRA would directly impact development activities with its focus on “shovel ready” infrastructure projects and provision of \$4 billion in additional funds for the HUD- administered Neighborhood Stabilization Program (NSP). NSP was a direct response to the foreclosure crisis and provided funds to large cities and states for the demolition or rehabilitation of vacant properties.

President Obama's first term reforms would focus on the coordination and integration of urban development efforts supported by the federal government. On February 19th 2009 an executive order established the White House Office of Urban Affairs (Obama, 2009b). The new office was directed to provide leadership and coordinate federal activities on all aspects of urban policy. President Obama's executive order identified the history of neglect in federal urban policy and the need for better federal coordination:

“In the past, insufficient attention has been paid to the problems faced by urban areas and to coordinating the many Federal programs that affect our cities. A more comprehensive approach is needed, both to develop an effective strategy for urban America and to coordinate the actions of the many executive departments and agencies whose actions impact urban life.” (Obama, 2009b)

In June of 2009, the efforts to better integrate development policy went further with the launch of the Partnership for Sustainable Communities. The partnership sought to foster collaboration among the Environmental Protection Agency, the Department of Housing and Urban Development and the Department of Transportation to support sustainable development and adherence to the six livability principles developed by the Partnership. As described by the Partnership:

“The Partnership for Sustainable Communities (PSC) works to coordinate federal housing, transportation, water, and other infrastructure investments to make neighborhoods more prosperous, allow people to live closer to jobs, save households

time and money, and reduce pollution. The partnership agencies incorporate six principles of livability into federal funding programs, policies, and future legislative proposals.” (Partnership for Sustainable Communities, 2016)

The coordination of the Partnership would allow the federal government to “speak with one voice” as described by HUD Secretary Shawn Donovan (Office of Housing and Urban Development, 2010). The Sustainable Communities Initiative would provide a focal point for the new partnership and placed HUD as a lead entity in implementing the Partnership’s vision through its Office of Sustainable Housing and Communities. The Sustainable Communities Initiative consisted of two grant programs, regional planning grants and community challenge grants (focused on neighborhood or corridor planning efforts). Both programs would provide nearly a quarter of a billion dollars in planning funds to more than 150 grantees.

Regional planning grantees would make up the majority of SCI funding and include seventy-four grantees across the nation. Regional planning grants were to support three-year planning efforts engaging multiple stakeholders and a variety of planning issues. As described by HUD:

“Sustainable Communities Regional Planning Grants support metropolitan and multijurisdictional planning efforts that integrate housing, land use, economic and workforce development, transportation, and infrastructure investments. The Regional Planning Grant Program places a priority on investing in partnerships that

direct long-term regional development and reinvestment, demonstrate a commitment to addressing issues of regional significance, utilize data to set and monitor progress toward performance goals, and engage stakeholders and citizens in meaningful decision-making roles.” (U.S. HUD, 2016)

SCI regional planning grantees formed consortiums, usually led by a lead agency, in most cases a regional planning agency. HUD utilized the Partnership’s six livability principles to guide planning, with social equity elements interwoven through the livability principles (U.S. HUD, 2016):

“1. 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.

2. 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.

3. 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.

4. Support existing communities.

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

5. Coordinate policies and leverage 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.

6. Value communities and neighborhoods.

Enhance the unique characteristics of all communities by investing in healthy, safe, and walkable neighborhoods—rural, urban, or suburban.”

These livability principles served as a foundation for the SCI program. Throughout the implementation of the HUD SCI regional planning grant program, HUD released various

policy guidelines, technical assistance and other guidance to ensure better compliance with equity elements embedded within the livability principles.

In addition to this assistance, a mandatory assessment was integrated into the planning process for all regional planning grantees in 2011. The Fair Housing and Equity Assessment (FHEA), was a required assessment that clearly linked an analysis of racial and social equity issues to community engagement and plan recommendations. The FHEA acted as a backstop to ensure equity elements were integrated in planning, particularly for grantees' compliance with the Fair Housing Act. HUD's SCI approach (as demonstrated in the structure of the FHEA) illustrated a recognition that true fair housing cannot be achieved simply through the construction of affordable housing units. Fair housing is connected to access to opportunity, in the form of good schools, employment, transportation and community amenities.

The FHEA was a three- part planning process focusing on the "three D's" of data, deliberation and decision- making. The FHEA would represent the first time that HUD was actively encouraging planning for fair housing at a regional scale with very specific equity standards and metrics. The assessment required an analysis of specific data on regional patterns of segregation, integration and access to opportunity. Analysis was to also focus on protected classes and other disadvantaged communities. The FHEA introduced a new geographic focus to equity analysis with a requirement that grantees analyze racial or ethnic concentrated areas of poverty. Special attention to "RCAP" or "ECAP" areas was required

in the analysis for the FHEA. Additionally, the FHEA was to include direct engagement with marginalized communities, and recommendations from the FHEA analysis were to be directly included (or “bridged”) into the final comprehensive plan for the region (Rose, et al. 2013).

The structure of the SCI regional planning program, the livability principles and the components of the FHEA were reflective of many theoretical advancements and new concepts to support equity planning and fair housing. In general, SCI was a Communicative Rational approach to planning--very focused on deliberation and technical analysis, but with a strong integration of equity principles guiding elements of the planning process. Equity elements of the plan reflected theories of Critical Race, Progressive Regionalism and the Geography of Opportunity. The foundations of these programmatic elements are described in detail in section IV of the literature review in Chapter 2.

1.3. SCI: High Hopes and Aspirations

Both the federal government and grantees had high hopes and expectations for the SCI. HUD consistently referred to SCI as an investment in grantee regions, representing an investment which the agency hoped would pay dividends in exemplifying the livability principles of the Partnership in action. HUD identified the work of SCI as critical to building the research to support stronger regional planning across the nation:

“A compelling case can be made for adopting regional approaches to many of the pressing issues facing communities across the country. More research is needed to understand which regional planning structures, policies, and practices work best and to evaluate the impact of federal funding and guidance such as SCI on planning processes and outcomes. Such research will become possible as more regional entities implement plans.” (U.S. HUD, 2015, Pg. 6)

The agency had very high expectations for regional plans, in their scope, content and potential for implementation. Additionally, SCI would demonstrate how this coordinated approach would conserve public resources. As described by the agency in their 2012 report to Congress:

“Across the country, taxpayers are seeing how plans that HUD is funding can conserve resources and save them money. These grants are supporting local and regional strategies to make government work smarter, ensuring every dollar invested achieves multiple benefits. Cumulatively, HUD estimates that these integrated investment plans have the potential to generate approximately 64,000 jobs annually, save an estimated \$160 billion in unnecessary infrastructure costs, and save consumers approximately \$6 billion per year once implemented that could be spent on goods and services, creating assets, and improving their quality of life.” (U.S. HUD, 2012, Pg. 4)

Grantees were expected to create extensive benchmarks and other success measures to demonstrate the application of livability principles. Grantees were expected to engage in

robust ways directly reaching under-represented communities and also adhering to the substantial equity components of HUD's guidance for regional planning.

Grantees were also heavily invested in the SCI planning process. The competition for SCI funding was intense. HUD received more than 1,500 applications for regional planning and community challenge grants, and was only able to fund 11% of applicants (U.S. HUD, 2012). In addition to the funding provided by the federal government, local grantees contributed an additional \$140 million in matching local funding support (U.S. HUD, 2015).

Grantees were anticipating substantial federal support in implementing these transformational plans for their communities. The federal government had indicated that SCI planning efforts would be supported by the three members of the federal partnership (DOT, EPA and HUD). SCI was to provide an unprecedented infusion of federal funding for planning and implementation to support regional planning efforts, sustainability, equity and livability in grantee regions.

SCI also presented an opportunity to pilot new policy models with grantee regions, particularly in the context of fair housing. In the first term of Obama's Administration, the agency was experimenting with new policy models ranging from reforming fair market rents to re-designing the compliance approach to the Affirmatively Further Fair Housing mandate (known as the AFFH rule). HUD was frustrated with the poor quality of traditional Analysis of Impediments to Fair Housing (AI) documents produced by entitlement

jurisdictions. The AI was mandated to be produced by all entitlement jurisdictions but the quality of AI's varied substantially from place to place. In response to this challenge, the agency sought to revise its compliance approach for entitlement communities (Sheffield, 2014). As discussed earlier, HUD is mandated by the 1968 Fair Housing Act to "affirmatively further" fair housing and this obligation applies not just to HUD but the government entities it funds (designated as entitlement communities).

Entitlement communities include principal cities in metropolitan statistical areas, other metropolitan cities with populations of at least 50,000 and qualified urban counties with populations of at least 200,000 (U.S. HUD Exchange, 2016). These entitlement communities receive Community Development Block Grant (CDBG) funds on a formula basis to support housing and economic opportunities for low and moderate income persons. In 2013, the Obama Administration would release its revised AFFH rule for comment, and the final revised AFFH rule would be officially announced in July of 2015 (U.S. Federal Register, 2015 and Davis & Appelbaum, 2015).

The SCI illustrated HUD's ongoing evolution in defining its role and efforts to amplify its impact in regards to fair housing and equity planning, particularly in the context of the AFFH. To better understand approaches to reforming the AFFH, HUD integrated the Fair Housing Equity Assessment as a required component of all regional plans created as part of the SCI program. The Fair Housing Equity Assessment, implemented in 2011 for SCI grantees, was a pilot of the revised rule for AFFH compliance for entitlement jurisdictions

released in 2013. The analytic approach and data metrics of the FHEA directly correlate with the analytical approach and data metrics of the revised AFFH rule. The planning process for the FHEA (data, deliberation and decision- making) also mirrored the process of the revised AFFH rule (community participation, analysis and goals/strategies). SCI provided a unique opportunity to pilot a major policy change before implementation and expectations for this unique policy reform in fair housing were high.

1.4. Research Overview: Research Questions and Overview of Document

This research is a formative program evaluation of the SCI. This research seeks to understand the impact of SCI's effort to support fair housing and equity planning, and the implications of the SCI experience. Has the SCI program presented an effective model for the federal government to support equitable regions and to affirmatively further fair housing? The formative evaluation is built on a theory of change that the communicative rational planning model, with a strong equity component, would produce more equitable planning processes. Therefore, this formative evaluation seeks to answer two primary questions:

- 1) Did the SCI's unique federal guidance (and equity mandate) promote the integration of social equity in regional sustainability plans and planning processes?
- 2) Was the HUD mandated Fair Housing Equity Assessment (FHEA) effective in advancing equity in the SCI planning process?

To explore and answer these research questions posed in this formative evaluation, I provide a literature review and an analysis of the experiences and outcomes for the SCI, with an emphasis on equity planning and fair housing. Chapter 2 presents a literature review focusing on the historical and contemporary role of planning theory and practice in addressing social equity concerns. The literature review is provided in five sections. Part I focuses on the historical development of equity concerns in planning theory and practice. Part II explores the ways in which planning theory maintains relevance through evolution and adaptation, giving examples of this evolution in relation to equity in planning theory and practice. Part III explores the way in which sustainability development theory incorporates equity, and shortcomings in addressing equity through the model. Elements of the literature review concepts represented in the SCI structure and planning process are discussed in Part IV. Part V reviews pertinent literature for the plan evaluation method utilized for this formative evaluation.

Chapter 3 provides the methodology and Chapter 4 is an analysis of the SCI. The research utilizes a mixed-methods approach to evaluating the planning processes and initial outcomes related to the HUD Sustainable Communities Initiative, through plan evaluation, document analysis and interviews. Chapter 5 presents a discussion and Chapter 6 provides research implications and my conclusion generated from this research, interpreting the relevant lessons for HUD from this research and indicating future pathways for research exploration.

1.5. Research Rationale: Is an Equity Mandate in Planning Relevant in the 21st Century?

Is equity still an important societal goal or an issue that still needs attention from policymakers and planners in the 21st century? Hasn't the work of planning's first generation of social progressives in the late 19th century and the second generation of equity advocates emerging in the 1960's and 1970's fixed the historical inequities associated with the planning field?

With the election of our nation's first African American president in 2008, many social commentators and the media posited that we were entering into a post-racial society (Schorr, 2008). Heralding this tremendous event in American history, post-racialists proposed that the election of a president of color, symbolically illustrated that the barriers to opportunity for people of color and our nation's racial divide were on the decline and would eventually fade into history (Rodgers, 2010; Parks & Hughey, 2011). Post-racialists supplemented these arguments with evidence of our nation's growing demographic diversity, the suburbanization of people color and growth of the African American middle class as indications of improvements in the domains of fair housing and education.

Although the events noted by the post-racial narrative should be applauded, this narrative ignores growing challenges and class- based disparities in the United States. While disparities in some domains have declined, disparities in other domains, such as poverty, incarceration, health, housing and isolation from opportunity are on the rise. Fair

housing and segregation challenges are still persistent and school segregation (particularly by race and class) has grown worse (Orfield et al. 2012). As described by the UCLA Civil Rights Project:

“...segregation has increased dramatically across the country for Latino students, who are attending more intensely segregated and impoverished schools than they have for generations... school segregation remains very high for black students. It is also double segregation by both race and poverty. Nationwide, the typical black student is now in a school where almost two out of every three classmates (64%) are low-income, nearly double the level in schools of the typical White or Asian student.” (Orfield et al. 2012, Pg. 7)

Segregation is still highly correlated with isolation from opportunity within the geography of the contemporary American city. Analysis of the 100 largest metropolitan areas found 9% of White children and 11% of Asian children were living in the “very low opportunity” neighborhoods within those regions. In comparison, 32% of Latino and 40% of African American children were living in “very low opportunity” neighborhoods (Acevedo-Garcia, et al, 2014).

Currently, one in ten African American males are incarcerated and some researchers estimate that as many as one in three will have been disenfranchised by the criminal justice system in their life time (Macarow, 2015). In comparison, only 1 in 108 people in the general population are incarcerated (Glaze & Herberman, 2013). As Michelle Alexander

notes in her book *The New Jim Crow*, incarceration of and disenfranchisement of African American men has risen to unprecedented levels, in essence recreating aspects of the Jim Crow South (Alexander, 2010). The disparities created by incarceration are racial and community- based, with some distressed neighborhoods acting as pipelines to the penal system and suffering the social and economic consequences of mass incarceration.

The extent of mass incarceration is profound at the community level. The phenomenon of “million dollar blocks” was first identified by researchers at Columbia University, who analyzed the volume of public expenditures for incarceration by city block (Orson, 2012). The research identified dozens of individual city blocks throughout New York City where New York State spends a million dollars or more annually to incarcerate individuals from that city block. Similar analyses across the nation have identified other high incarceration neighborhoods where millions are spent annually for imprisonment.

Many of the economic and housing gains made by the African American community have withered due to the disparate impact of the economic and housing crises, and the recession has battered the emergent African American and Latino middle class. Child poverty rates have soared in the aftermath of the Great Recession, with 37% of African American and 32% of Latino children living in poverty in 2014, compared to only 12% of White children (Children’s Defense Fund, 2015).

At the end of the Obama presidency, racial conflict and protests have emerged in the aftermath of repeated police shootings of unarmed African American men and boys

throughout the United States (BBC, 2015). The tensions have brought to the forefront long-standing policy conflicts with communities of color, producing the “Black Lives Matter” movement (Craven, 2015). At the end of the Obama Administration’s second term, prominent African American commentators, scholars and authors, such as Tavis Smiley and Cornel West, have documented the escalating challenges facing the African American community during the Obama presidency (Smiley, 2016 and Thompson, 2011).

Equity concerns in the U.S. are not just focused on racial inequity, but impacted by growing economic inequality across the United States and evidence illustrating the decline of U.S. social mobility. Research suggests that social mobility in the United States has declined and is now lower than what is found in most Western nations (DeParle, 2012). Growing economic inequality has led to the Occupy Wall Street movement’s “we are the 99%” mantra and research continually indicates growing income inequality, in the U.S. and globally (Sledge, 2011 and Parker, 2014). Income inequality challenges are most evident when viewing the continually shrinking “middle class” in the United States. Since 1971, the proportion of U.S. households who were “middle- income” has shrunk from 61% to 50% (Pew Research Center, 2015). The shrinking middle class is evident at the metropolitan scale as well. In the 229 largest metropolitan areas, 203 (89% of all regions analyzed) experienced a decline in the share of households that are middle- income (Pew Research Center, 2016).

The post-racial narrative also ignores important lessons from U.S. history and the shifting concepts of race, racialization and identification of an “other.” Conceptualizations of race and the “other” in U.S. history have always been dynamic and shift with cultural, political and demographic changes in society. The United States has a powerful legacy of creating and re-creating an “other” with shifting racial identities (Ignatiev, 1995). These history lessons would suggest that changing U.S. demographics do not necessarily equate to growing racial and socioeconomic justice. In fact, some have noted that our changing demographics are creating greater anti-immigrant rhetoric and tensions, a phenomenon that has occurred with every major demographic transition in U.S. history, often with devastating results in regards to policies directed toward new Americans (Mollenkopf & Pastor, 2013).

We are also learning more about the ways in which equity is intricately interconnected with our society’s health and economic vitality. In *“The Spirit Level: Why Greater Equality Makes Society’s Stronger,”* Richard Wilkinson and Kate Pickett argue that high levels of comparative inequality contribute to poorer outcomes for all people, even in affluent societies. Wilkinson and Pickett note that even middle class and more affluent families in more unequal societies experience poorer health, social and educational outcomes. The authors identify the high rates of stress and anxiety related to social status and poorer social relations found in highly unequal societies as primary contributors to this inequality effect (Wilkinson & Pickett, 2009).

Research suggests that inequality is harmful to economic growth (Truehaft & Madland, 2011). Public health data shows that the very existence of inequities between groups hurts the health of all groups (Wilkinson & Pickett, 2009). Even more, non-disadvantaged groups fail to reach the levels of health that are possible when there are inequities in opportunity. Health disparities produce widespread economic harm to the U.S. economy and add additional cost burden to our nation's health care infrastructure. The Joint Center for Political and Economic Studies estimates that health disparities for racial and ethnic populations produced \$1.24 trillion in cost to the U.S. economy between 2003 and 2006. This included nearly \$230 billion in medical expenses and nearly \$1 trillion in indirect costs to the economy (LaVeist, Gaskin & Richard, 2009).

Geographic and social inequities harm people beyond their direct impact on marginalized groups and communities. Inequities and disparities are more than just a representation of one group or community doing worse than others; they are a symptom of a greater challenge: the isolation or marginalization of a large number of a community's residents. Inequity presents a tremendous challenge to our national economy and society. In the United States, the economic gap between the poor and wealthy continues to widen. More alarming, 46 percent of children born into poverty remain poor throughout their lifetime (Truehaft & Madland, 2011).

Shifting demographics will inherently be problematic, as communities who suffer the deepest inequality and barriers to opportunity become a majority in America. By 2042,

non-Whites will make up the majority of the U.S. population. Data from the Census 2010 illustrates the fast growth of the non-White population in the past decade: non-Whites consisted of 92 percent of the nation's population growth from 2000 to 2010 (Truehaft & Madland, 2011). As the American population undergoes this shift, access to jobs, education and health for disadvantaged groups will be imperative for the sustainability of America.

Given the disparities and barriers to opportunity and health for many communities of color, the economic consequences for a demographic shift will present a significant challenge. The rapid demographic transition will affect the American economy, politics, and culture. While the U.S. has seen an expansion of civil and human rights throughout the 20th century, the equity mandate in planning continues to remain a critical goal for ensuring a just and economically sustainable society. Many of these challenges occur at a regional scale and cannot be solely addressed by an individual municipality. HUD recognized the challenge that inequity presents. And while its mandate is centrally focused on equitable housing, HUD's perspective, as demonstrated by the SCI, is that equitable housing is best addressed through a more comprehensive approach centered through a sustainability lens.

Chapter 2. Literature Review: Edging Toward Equity

2.1. Part I - The Evolution of Social Equity in City Planning Theory and Practice

“I do not pretend to understand the moral universe; the arc is a long one, my eye reaches but little ways; I cannot calculate the curve and complete the figure by the experience of sight, I can divine it by conscience. And from what I see I am sure it bends towards justice.” -Theodore Parker, Abolitionist Speech in the Massachusetts Statehouse, January 1858

Like our broader society, planning has had a long road toward equity, but its evolution has also followed the longer arc or “bend toward justice” first described by Theodore Parker more than 150 years ago. The planning field has a long history of intersecting with, contributing to and addressing issues of social, racial and geographic equity, from the late 19th century work of Jacob Riis and social reformers to contemporary concepts such as progressive regionalism and environmental justice. While planning has often served the needs of marginalized groups, racial, ethnic and class discrimination has been interwoven within various aspects of planning practice and policy throughout the 20th century (Cashin, 2004).

The following literature review provides a historical overview of the profession's engagement with social equity, moving from the progressive era to the contemporary Just City. In critiquing contemporary approaches to equity in planning, I review relevant theory and research from planning and other fields that should influence equity planning theory and practice. Additionally, I note planning's continued poor and limited understanding of the role of race in development as contemporary challenges facing the future of equity planning. I conclude that planning is a critical domain to improving social and racial equity in our contemporary society, and the field should bolster equity planning in light of the growing inequality and changing demographics of the United States.

Context: Our Conflicted History of Othering

Conceptualizations of the "other" in U.S. history have always been dynamic and shifted with cultural, political and demographic changes in society. As a former colonial nation, the United States has a powerful legacy of creating and recreating an "other" alongside shifting racial and ethnic identities throughout our history (Ignatiev, 1995). From the efforts to harden the distinction between African slaves and White indentured servants in reaction to African and White solidarity in Maryland's manifestation of Bacon's rebellion in the late 17th century, to efforts that demonized the waves of immigrants entering into the nation in the 19th and 20th century, race, class, ethnicity and religion have been powerful divides in U.S. society. Historically, the colonies and the United States have been a land where "Whiteness" was privileged and the "Other," however defined (by race,

ethnicity or religion), was exploited and socially controlled. The racialized other would be seen as unique, different and sub- human. This phenomenon of maintaining a racialized caste system would coexist with the principles of equality emerging from enlightenment scholars and leaders, and embraced by a young United States.

Like many professional fields or disciplines, planning would be impacted by this “cognitive dissonance” infecting U.S. social, political and economic systems. Planning, design and development would play a role in expanding opportunity and improving quality of life, while also supporting racialized caste systems in our conflicted society. The planning profession would play a particularly influential role in supporting and maintaining “racialized space” for the “other” in our emerging cities through zoning and other measures (Silver, 1997; Fox-Gotham, 2001). The field would also seek to improve the quality of life for these racialized spaces and later assist in breaking down structures of “othering” through political empowerment, promoting Civil Rights and dismantling mechanisms supporting segregation (Angotti, 2007). The conflicted history of equity planning in the profession is a mirror of not only conflicts within the field, but reflects our long- term societal struggle in balancing the two opposing forces of “othering” and “equality” in our nation.

Equity in Planning’s Infancy: The Tenements and Social Reformers

Activism around urban social problems, through the actions of social reformers, has a long history dating to the 19th century. Social progressive activism emerged at this

time to both communicate and advocate for addressing the unsanitary, crowded and unsafe conditions facing urban tenement communities. Jacob Riis, one of history's more famous social reformers, exemplified the social reform movement, attempting to display the terrible conditions facing impoverished tenement communities in an effort to bring reform (Riis, 1890). Riis and his contemporaries challenged the Social Darwinism of the time period, illustrating the relationship between chaotic and dysfunctional places, and the impacts on the behavior and outcomes of tenement residents. As described by Riis in his discussion of crime in the tenements in 1890:

“Those very places and domiciles, and all that are like them, are to-day nurseries of crime, and of the vices and disorderly courses which lead to crime. By far the largest part—eighty per cent at least—of crimes against property and against the person are perpetrated by individuals who have either lost connection with home life, or never had any, or whose homes had ceased to be sufficiently separate, decent, and desirable to afford what are regarded as ordinary wholesome influences of home and family.” (Riis, 1890)

As described by scholar Peter Drier, the progressive movement emerging in early 20th century urban America would have long- term consequences on policy, spanning decades:

“In the early 1900s, New York City was a cauldron of seething problems—poverty, slums, child labor, epidemics, sweatshops and ethnic conflict. Out of that turmoil,

activists created a “progressive” movement, forging a coalition of immigrants, unionists, muckraking journalists, settlement house workers, middle-class suffragists and upper-class philanthropists. Tenement and public health reformers worked alongside radical socialists. While they spoke many languages, the movement found its voice through organizers, clergy and sympathetic politicians. Their victories provided the intellectual and policy foundations of the New Deal three decades later.” (Drier, 2005)

These efforts by Riis and other progressive social reformers contributed to the establishment of tenement housing standards, radical improvements in water and sewer services, and efforts to establish social resource centers (settlement houses), the precursors to contemporary community development organizations, to meet the needs of tenement and immigrant populations. From a contemporary perspective, we can interpret the efforts of the social reformers as supporting a place-based (infrastructure and housing) and people-based (settlement houses, education and labor organizing) approach to achieving an equitable and just city.

City Beautiful: The Moral Power of Beautiful Civic Space

City planning would begin to emerge as a legitimate field with the advent of the City Beautiful movement that would dramatically reshape major cities. The City Beautiful movement, emerging in the late 19th and early 20th century, also attempted to address the social ills and chaos of late 19th century urban space, but this response was less concerned

with social justice and firmly grounded in the principles of physical determinism, espousing that through ordered design we could tame the disorder of the contemporary city, and also cure the disorder which contributed to immorality among city dwellers.

The City Beautiful movement would seek to sweep away all urban problems through imposed order and exemplary design, enlightening the masses through the architectural “genius” of its designers. While several other important and prominent theoretical movements would follow in the planning field, the concepts and principles of the City Beautiful movement would be influential in planning and design for decades. City Beautiful would produce many positive changes for the health and wellbeing of cities through a rigid place- based approach. Beautiful and accessible recreational, public and civic spaces would transform many dense urban areas, dramatically improving the quality of life for urban residents (Peterson, 2003).

Unfortunately, the City Beautiful movement did not expand beyond its rigid place-based parameters, producing some negative outcomes, such as displacement of residents from urban slum areas as they were redeveloped, and ignoring many of the perils facing the poor working class neighborhoods. City Beautiful was a rigidly undemocratic process, a well-intentioned, but top down approach to city planning-- an approach that when implemented through the existing and very corrupt power structures of early 20th century cities, would produce many inequitable outcomes, enriching some while often burdening

the marginalized whose communities were either ignored or felled in the wake of City Beautiful plans.

The City Beautiful and Progressive Planning Conflict

The competing vision of City Beautiful advocates and Social Progressives produced conflict (Peterson, 2003 and 2009). While both advocated for better cities brought about through organized planning efforts, the respective perspectives on equity were wildly divergent. Progressives favored “social justice and governmental activism” while City Beautiful advocates favored “civic virtue and shared aesthetics culture.” As described in Jon Peterson’s history of the era:

“Social progressives challenged the root assumptions of City Beautiful planning head-on. Coming from the same segment of the American society as the City Beautiful advocates did, they readily grasped the cultural bias of the beautifiers toward the well-to-do and its preoccupation with public improvements to the neglect of urban slums and their inhabitants.” (Peterson, 2003, Page 228).

These tensions would come to a head at the 1909 and 1910 National Conferences on City Planning, when vocal social progressive and critic of the City Beautiful movement Benjamin C. Marsh was replaced in leadership of the Committee on Congestion of Population by Fredrick Olmstead. The shift in leadership would pull the emerging planning profession away from the activist- oriented social progressive movement, and toward a

more unitary planning approach, establishing planning as an administrative function of the public sector (Peterson, 2009). The early leadership of women in the urban social progressive movement was also undermined, as the dominance of City Beautiful and the further professionalization of the field excluded women leaders and female- led social activist organizations (Szczygiel, 2003).

Segregation in the Early Zoning Era: A Wolf in Sheep's Clothing

From a historical perspective, planning's primary policy tool, zoning, has been explicitly complicit in supporting racial and social marginalization in the United States. In its infancy, zoning was not only used to shape and influence physical space but also to promote social objectives. The rise of zoning and other land use controls coincide with other important historical events, most notably the first wave of African American urbanization from the South to northern cities, and intensified nativist and anti-immigrant, anti-Catholic and anti-Semitic efforts in the early 20th century. This time period would also be a critical time period for scholarship and organized efforts to advocate residential segregation as a city planning ideal, not only in the U.S. but also in colonies and former colonies around the globe. Racial segregation enabled social control in cities that needed the labor of the marginalized (Nightingale, 2012).

In regards to the early use of zoning, racial isolation and segregation was an explicit goal of early zoning policy. Zoning was intended to not only keep away unwanted land uses but also undesirable populations, in this case certain racial groups and ethnic

populations. Baltimore passed the first “racial zoning” in 1910, with many other communities following suit, until the U.S. Supreme Court overturned the ordinances in 1917 (Silver, 1997).

Although racial zoning was outlawed, “expulsive zoning” was then utilized to allow the concentration of undesirable land uses into marginalized communities, while barring these undesirable uses from affluent White communities (Rabin, 1989). City administrators also worked, in collaboration with real estate interests, to aggressively support restrictive covenants to maintain the spirit of racial zoning (Gotham, 2002). In many cases, these activities were coordinated with comprehensive planning efforts, especially in southern cities (Silver, 1997).

Rational Planning and Equity: From Redlining to Urban Renewal

Echoes of the City Beautiful physical determinism and an exclusively top down planning approach would be evident in the Rational Planning Theory, which came to dominate planning by the mid-20th century (Fainstein, 2005). Spearheaded by the work of Keynesian economists such as Edward Banfield, the Rational Planning or Rational Comprehensive Model included the physical determinism of the City Beautiful movement, bolstered by the modernist design movement, while integrating a heavy dose of organizational theory and science (Banfield, 1955).

The Rational Planning Model would bring the architectural benefits of modernism to planning, enacting an interpretation of Corbusier's vision of life in cities, while utilizing planning tools like cost-benefit analysis. The Housing Act of 1949, which instituted urban renewal, catalyzed the rational planning model's application in cities throughout the United States (Teaford, 2000). Urban renewal, combined with the Federal Highway Program, would provide the federal impetus and funding to drive a reshaping of U.S. cities. Urban renewal, which focused on slum clearance, was dictated by the Rational Planning Model, and often produced disastrous results for urban communities, in particular in low-income communities of color. Urban renewal and highway construction destroyed many Black communities and impoverished areas, causing widespread displacement, while replacement housing was nonexistent or only in hyper-segregated public housing towers (Teaford, 2000).

Radical Disruption: The Emergence of Advocacy Planning

The critique of the Rational Planning Model would emerge as Lindbloom's 1959 classic article "The Science of Muddling Through" interjected Incrementalism into planning theory (Lindbloom, 1959). Lindbloom and other incrementalist theorists would question the rational approach's effectiveness in being implemented within the complex sociopolitical environment. Incrementalists were critiquing the Rational Planning Model, but the 1960's would bring a passionate assault from a variety of critics. Jane Jacobs critiqued Rational Planning and the planning profession as destroying the essence of urban

neighborhoods. Jacobs' criticism of the profession was direct and fervent, referring to planning a "pseudoscience" with "neurotic" tendencies (Jacobs, 1961). The Advocacy movement would emerge to counter the physical deterministic, undemocratic nature and discriminatory impact of the Rational Planning Model. Advocacy planning would seek to re-orient planning toward "people-" focused policies and practices, particularly advocating on behalf of the most marginalized.

As described by Fainstein in *Planning Theory and the City*, this retort to the Rational Planning Model acted as a new progressive reform movement, mirroring its ancestor, the urban reformists. As Fainstein states:

"The reform movement was attacking the prevailing rational or quasi-rational model on two grounds: first, it was a misguided process; and second, it produced a city that no one wanted. The demands of reformers on the ground expressed themselves within planning theory through political economic analysis of the roots of urban inequality and through calls for democratic participation in planning."
(Fainstein, 2005, Pg. 124)

If Jacob Riis represented the social reformers of the late 19th century, Paul Davidoff would represent the face of the advocacy planning movement. Davidoff's frustration with the planning process emerged through his work in impoverished and segregated neighborhoods in Philadelphia and New York. Davidoff recognized the failure of the Rational Planning Model in respecting pluralism and supporting equitable outcomes for

impoverished and segregated communities. As described by Davidoff in his seminal article “Advocacy and Pluralism in Planning”:

“The prospect for future planning is that of a practice which openly invites political and social values to be examined and debated. Acceptance of this position means rejection of prescriptions for planning which would have the planner act solely as a technician.” (Davidoff, 1965)

Davidoff also questioned the validity of planning being implemented from a position of neutral, rational decision-making. Rationality was deeply impacted by not only the power structures of urban spaces but also by the values held by planning professionals. Davidoff’s critique of the Rational Planning Model raises important questions: who are planning decisions deemed rational for, and what standards judge metrics of rationality? As stated by Davidoff:

“Appropriate planning action cannot be prescribed from a position of value neutrality, for prescriptions are based on desired outcomes. One conclusion drawn from this assertion is that ‘values are the inescapable elements of any rational decision-making process.’” (Davidoff, 1965)

Davidoff extended this critique of technical neutrality and countered that planners should be actively advocating for the marginalized, particularly those excluded from the traditional political process. Seeds were laid for the future for agonistic and communicative

planning theories when Davidoff proposes a decision-making structure for planning that is parallel to the U.S. legal system, in which competing interests can have a fair process that allows for the weighing of evidence and “reasoned decisions...to arrive at a relative truth” (Davidoff, 1965). From Davidoff’s perspective, true inclusionary planning would include a robust engagement process. As described by Davidoff:

“Inclusion means not only permitting the citizen to be heard. It also means that he be able to become well informed about the underlying reasons for planning proposals, and be able to respond to them in the technical language of professional planners.” (Davidoff, 1965)

The emergence of advocacy planning occurred at a critical time period in contemporary American history, and it cannot be separated from these historical elements that helped forge the movement. The built environment has shifted radically in the post-War era, with massive construction of exclusionary suburban development, while inner-city neighborhoods faced widespread disinvestment or the bulldozer (Teaford, 2000). American cities were boiling pots of racial isolation, racial tension and urban decline, with more than 700 civil disturbances boiling over in U.S. cities during the 1960’s. The Fair Housing Act sat languishing in Congress for years, not being enacted until the weeks after Dr. Martin Luther King’s death in 1968, while the Civil Rights movement changed the cultural norms of America and blazed new opportunities for people throughout the nation.

This transformational and contentious time in U.S. history provided the backdrop to the radically different theoretical model presented by Advocacy planners.

Legacy: Critique and Impact of the Advocacy Movement

Advocacy Planning Theory would continue to develop throughout the late 1960's and 1970's through the work of practitioners like Norm Krumholtz and other theorists (Krumholtz, 1990). Like any emerging planning theory, the Advocacy Planning movement did not escape criticism from practitioners and theorists. Applying the principles of advocacy planning in practice proved difficult, and many political conflicts ensued in advocacy planning's implementation. Representation of poor and often racially segregated communities was challenging. Advocacy planners were socioeconomically different than the communities they were advocating on behalf of, creating an inherent problem in the approach. The Advocacy Planning Model was also accused of raising expectations in impoverished communities that could not be met by advocacy planners.

Critics of advocacy planning also questioned the basis for pluralism that supported justice, and how pluralism and advocacy would work given the imbalance in power between marginalized groups and economic or political interests, and elitism or corporate power. As described by Mazzioti: "*...political pluralism is a well-constructed social myth which provides the rationale for instituting social programs designed to placate the politically and economically disenfranchised.*" (Mazzioti, 1974) This critique would develop in the Radical Planning Model, a model that questioned the potential for the

incremental approach utilized by advocacy planners to effect structural change (Grabow and Heskin, 1973). Radical planners felt that planning should be re-oriented toward approaches that centered on social society and equity, and that this was the best approach to deal with uncertainty in the world (Friedman, 1987).

The early advocacy critique of the Rational Comprehensive Model was based on a primarily Marxist perspective, which often focused on redistribution goals in relation to resources, and subsumed inequities based on place, gender, race and ethnicity, under the model of class- based marginalization. Some have criticized this Marxist or redistributive theoretical foundation, a framework that fails to promote democracy and capture the complexities of inequity(Cardosa and Breda Vasquez, 2007). Hanna Matilla also challenges the “distributive” and Marxist framework for producing equity, especially as formulated in the aesthetic justice theory, and extends the “right to the city” model in a communicative turn to also include the “right to design the city.” (Matilla, 2002)

Some have questioned if advocacy planning has actually impacted the field, or if equity has just been embraced in theory and not in practice, as described by Scott Campbell:

“Similarly, though planners often see themselves as the defenders of the poor and of socio-economic equality, their actions over the profession's history have often belied that self-image...At best, the planner has taken an ambivalent stance between the goals of economic growth and economic justice.” (Campbell, 1996)

Although advocacy planning has a mixed history in promoting and supporting equity, the “ambivalence” cited by Campbell is not necessarily clear. Despite the criticism and challenges encountered by the Advocacy Planning Model, and the development of other models that would eventually surpass advocacy theory in the discourse of planning theory, the advocacy planning era produced a dramatic transformation to the field of planning.

In the years that would follow the birth of advocacy planning, planning practice permanently changed, with a new cadre of planning tools promoting advocacy and equity goals being adopted across the nation. Inclusionary zoning was established in 1974 in Montgomery County, MD. The first regional fair share housing programs would be enacted by the end of the 1970’s. Most notably, the practice of contemporary community development would emerge, with the number of CDC’s (community development corporations) growing from the initial 100 CDC’s incorporated in 1966 (starting with Brooklyn’s Bedford-Stuyvesant Restoration Corporation) to the more than 4,600 CDC’s that existed in 2005 (Clay & Jones, 2009). Advocacy planning theory would leave a lasting mark on the practice of planning, integrating equity and advocacy concerns in a way that was unparalleled in planning history.

Interdisciplinary Insights: Critical Race theory and Structural Racism

Critical Race (CR) Theory was built on the foundation of critical legal studies. CR Theory emerged in the 1970’s and 1980’s, led by scholars who were frustrated by the lack

of progress in promoting racial equality in the aftermath of the Civil Rights era (Delgado & Stefanic, 2000). CR Theory, which originated among legal scholars, has expanded into other fields such as ethnic studies, humanities, education and social science.

CR Theory perceives race as a purely social construction and therefore perceives racial inequalities as social constructions supported by policy, law and institutions. From the CR perspective, race does not exist as a biological distinction in today's society but is a social reality molded by policies designed to subjugate people of color in America (Omi, 1997).

Race in America represents more than just a physical distinction between individuals; race is also interlinked to the hierarchical position of a group in relation to society (Goldberg, 1993). The social construct of race is self-perpetuating. Today's societal institutions and structures are impacted by historically racist policies and thus are designed to ensure racial disparities exist in American society. For example, although legally-sanctioned segregation has been abandoned in America, legal and institutional structures still support de facto segregation. Segregation is still prominent in today's cities and schools, and blocks people of color from accessing many opportunities.

Since race is socially constructed, some have questioned if the negative implications associated with race can be avoided by ignoring the concept of race. This "colorblind" logic is faulty because institutional structures supporting racial disparities will still exist (powell, 1997). According to CR theorists, racial disparities can only be

addressed by addressing these underlying structures that provide the foundation for racial disparities in society.

Bell's work criticized traditional Civil Rights law and theory as focusing too much on intentional acts of discrimination and voiced the need for new theoretical frameworks to address Civil Rights challenges in the post-Civil Rights era. Bell states his frustration with the failure to achieve the goals of *Brown* despite extended legal protection to African Americans in his seminal article "*Brown v. Board of Education and the Interest-Convergence Dilemma*:"

"...Brown transformed blacks from beggars pleading for decent treatment to citizens demanding equal treatment under the law as their constitutionally recognized right. Yet today, most black children attend public schools that are both racially isolated and inferior. Demographic patterns, White flight, and the inability of the courts to effect the necessary degree of social reform render further progress in implementing Brown almost impossible." (Bell, 1980, Page 518)

Unfortunately, the isolation and segregation observed by Bell in 1980 continue to this day and in many domains, such as school segregation, conditions are worse now than in 1980. Bell's critique of traditional Civil Rights legal theory is that it ignored White privilege and the realization that dominant groups would reassert control over marginalized groups through other means (Stec, 2007).

Derrick Bell's work also asserts that dominant racial groups will tolerate racial justice and progress for disenfranchised groups as long as these improvements will also be in the self-interest of the dominant groups (Bell, 1980). Later, legal scholars would illustrate the development of public policies that de-concentrated poverty in segregated inner city neighborhoods as a manifestation of this interest convergence (Stec, 2007). Smith and Stovall also found support for Bell's thesis, identifying how Hope VI and education policy in Chicago worked to further marginalize low- income African Americans, creating a new politics of containment that was perfectly legal and cloaked under a disguise of class conflict (Smith & Stoval, 2008). Unlike efforts to integrate housing, de-concentration presented a direct benefit to the elites (the reclamation of inner city space and opportunities) (powell & Spencer, 2003). This theme of accepting equity if it can be framed and perceived as benefiting the dominant or elite resonates with more recent attempts in the equity movement to frame equitable development as a strong economic development model (Truehaft & Madland, 2011).

Interdisciplinary Insights: From the "Other Half" to the "Underclass" and the "Geography of Opportunity"

Sociology has long investigated and theorized issues of equity and inequity from the perspective of human society and social problems. Among contemporary theorists, William Julius Wilson's work has sought to identify why in the post-Civil Rights era, deep and persistent poverty continued for many urban African Americans. Wilson's research

presented an analysis of the urban challenges facing today's underclass as something produced by institutional, societal, cultural and structural factors. Wilson identified the role of economic restructuring, growing gender disparities in employment for Black men, and integrated Kane's theories of spatial mismatch in creating an underclass in modern American cities (Wilson, 1978; Wilson, 1987; Kane, 1968). Massey and Denton expanded upon Wilson's analysis of the underclass, drawing a robust analysis of the role of both historical and contemporary segregation in the formulation of America's racial urban underclass (Massey & Denton, 1993).

Space became the next frontier in understanding urban inequality in sociology and related disciplines. Geography has long focused on space as a central domain impacting justice, injustice and inequality (Harvey, 1973). Jargowsky's research focused on the intersection of poverty and place in driving inequity, and the deep negative social consequences of concentrated poverty in America (Jargowsky 1992 and Jargowsky 1997). The work of Jargowsky and other theorists looking at the impacts of concentrated poverty played a direct role in shifts in federal policy in the 1990's, and had a direct impact on planning practice, with many of the public housing de-concentration programs and federal housing mobility experiments grounded in this critique of concentrated poverty.

Galster and Killen would refine these theoretical advancements further by developing their "Geography of Opportunity" model of understanding inequality. Galster and Killen's "Geography of Opportunity" theory is based on the premise that unequal

geographic distribution of societal opportunity structures plays a significant role in perpetuating inequity in our society. Galster and Killen's theory is based upon studies from the field of geography, psychology (looking at the complications in understanding individual choices), and the exhaustive body of literature on neighborhood effects (Galster & Killen 1995). The work of late 20th century sociologists and other scholars would have a direct impact on planning policies and programs, particularly those seeking to influence urban economic development and efforts to restructure the concentrated poverty of public housing.

The origins of Galster and Killen's model would be Myrdal's *The American Dilemma: The Negro Problem and Modern Democracy* (Galster & Hill, 1992). Myrdal's "principle of cumulation" was an early articulation of the theory of cumulative causation as a factor driving inequitable social outcomes (Myrdal, 1944). This important theoretical development, and the integration of place and space into understanding inequity, would set the stage for the next theoretical development in understanding inequity, the theories of structural racism and structural or systemic disadvantage.

Structural racism emerged as a critique of the dominant simplistic frameworks for understanding racism and racial inequity in society. Structural racism theorists argued that racism studies needed to shift away from frameworks that viewed racialized outcomes as a product of just psychological individual or cultural factors, and toward a framework that included structural interactions. Bonilla-Silva (1996) critiqued contemporary racial theory

as not paying enough attention on the social systems or structural interactions found within racialized societies. Bonilla-Silva proposed the framework of “racialized social systems” as a way of understanding racialized outcomes, focusing on the interactions of social systems, institutions and other structural connections in perpetuating racial inequities, and that this system can perpetuate without traditionally “racist” actors (Bonilla-Silva, 1996). Structural racism presented several new conceptual theories of racial inequity, including: racism is redefined as a racialized societal outcome; racial inequality is dynamic and not static; racial outcomes can involve both implicit and explicit discrimination; and contemporary inequities are grounded in historical norms, behaviors or policies, or as described by powell and Grant-Thomas, racialized outcomes are grounded on the “sediment of history” (Bonilla-Silva, 1996; powell & Grant-Thomas, 2006).

Many legal theorists and scholars began looking at the role of place, neighborhood or community as a domain of structural interaction and structural racism. powell (2003) bridged Galster and Killen’s “Geography of Opportunity” theory with structural racism legal theory in his Opportunity Based Housing Theory. Opportunity Based Housing Theory argues that affordable housing policy should be sensitive to the geography of opportunity structures and that fair housing requires the public sector to affirmatively promote affordable housing for marginalized communities to be located in neighborhoods with positive opportunity structures (powell, 2003).

Rebecca Blank (2005) further integrated Myrdal's theories into the structural racism framework, arguing for the concept of "cumulative discrimination," which registered the impacts of discriminatory actions and structural arrangements. Her work would later catalyze the understanding of "structural or systemic disadvantage," a term utilized to capture the structural racism framework and Blank's cumulative discrimination.

Contemporary Critique and Challenges: Viewing City Planning and Equity Planning Through a Critical Race and Structural Racism Lens

Despite the efforts of advocacy planners (who were predominately White) planning has historically had a blind spot to the role of race and experience of race in the American cities (Manning-Thomas, 1994), a deficiency that is particularly profound in providing a better understanding of the "history" of race and development and the continuing impacts of this history today. As June Manning-Thomas noted more than two decades ago:

"As planners wrestle with the problems facing today's central cities, it is important to draw upon all of the intellectual tools possible in order to understand how this situation came to be and how it affects planning efforts. Those who work in conditions of suburban prosperity rather than central city decline need to understand why such stark contrasts linger. Planning history, a field that has flourished in recent years, is an important part of our intellectual arsenal. Yes as presently constituted the field of planning history often gives inadequate

preparation for understanding the relationship between planning and race.”

(Manning-Thomas, 1994)

Advancements in scholarship related to race and racial equity, such as Critical Race Theory and Structural Racism, are insightful “intellectual tools” to address this shortcoming in planning. Critical Race Theory challenges the Rational Planning Model, asserting that by its nature the Rational Planning Model exists within a racial and socially unjust political, institutional, legal and cultural framework and thus will only be a tool to reinforce (either explicitly or implicitly) the subjugation of certain populations.

Rationality is bounded by ideology, culture and institutions. Therefore no pure rationality can exist without acknowledgement of these cultural, legal and institutional frameworks. CR Theory adds context to the rational planning approach. CR Theory illustrates that societal norms, structures, history and institutions are not value- neutral, thus raising questions about the assumed lack of bias in rational planning decision-making. The question to be raised is, rational for whom and by what standards of rationality?

Derrick Bell’s theories of dominant group interest still come into play in how we communicate and talk about planning solutions. CR Theory also challenges the Advocacy Planning movement as not positioning equity as an interest of the dominant population. CR Theory’s tools of storytelling to express subjugation and identify oppression also resonate with communicative planning and could improve integrating equity and the experiences of the marginalized into communicative practice.

Finally, CR Theory should alert us to the fact that the principal domains of planning, space, place, land use, housing and community are the primary domains driving Civil Rights challenges, raising the bar for planners to acknowledge that their work always has great Civil Rights implications. This acknowledgement should also provide a critical lens that questions the institutional norms that may drive planners to make decisions that contribute to limiting justice for the disadvantaged.

The development of Structural Racism and Structural Disadvantage Theory both support and challenge the physical determinism that has dominated planning history and has been essential to various planning theories (the Rational Planning Model and more recently, New Urbanist models). Through the development of structural theories of racism and disadvantage we can see that place, community, neighborhood and the physical environment do have a profound impact on individuals and society, but so does the socioeconomic environment. The failure of modernist public housing illustrates this shortcoming, while public housing developments focused primarily on improving the physical environment, design alone could not counter the socioeconomic and sociopolitical conditions in public housing developments, both the concentration of poverty and the disenfranchisement of its marginalized residents.

Structural racism and structural disadvantage also introduce more complexity into our understanding of the way people, environment, society and community interact. Structural racism is a dynamic process and in flux, and systemic disadvantage includes

complex cumulative causation and diverse interaction among multiple structures, institutions, environments and people. This complexity challenges the rational planning approach. Given the complexity of physical and social systems that are interactive and dynamic, the perfect information, perfect foresight and total control needed to rationally plan in a comprehensive way as part of a top down planning process, is not possible.

Dynamic systems require dynamic policy responses and to truly understand the complexity of planning issues and communities, robust civic engagement (not top down rational planning), is needed to provide a better model of understanding these dynamic and complicated systems. Complex systems of disadvantage also require a planning response that is flexible and responsive to change. To successfully intervene in complex systems will require planners to have a robust theoretical and conceptual framework. It will also require that planners approach planning problems with a willingness to embrace a variety of problems and domains impacting community and equity. Planning cannot be defined as just the domain of land use or zoning, or community development, but should be a field that can utilize a variety of tools and attack a variety of challenges (such as food security, asset building or educational equity) to achieve healthy, sustainable and just communities.

Toward a Just City: Equity in Contemporary Planning Theory and Practice

Although Advocacy Planning Theory was eventually supplanted by other planning theories, aspects of social equity are found in numerous contemporary planning theories and practice. In the post-modernist era, scholars formulated other planning theories or

paradigms (Feminist Planning Theory, Regime Theory, Critical Pragmatism, and Agonism). A dominant theory to emerge during this time was Communicative Planning Theory. Communicative Planning Theory would grow from the pluralistic planning models interjected into planning theory and practice during the infancy of the advocacy movement. Communicative Planning theorists question the validity of “expert knowledge.” Dialogue and discourse are the source of finding “truth” and this can be achieved through communicative rationality (Habermas, 1984-1987). Forester’s work grounded Communicative Theory on the principle that by providing access to public decision-making processes and adequate technical information, communicative action could empower marginalized and disenfranchised communities. Planners are essential to this process both as educators to bring information and access to marginalized groups but also as consensus builders, bridging diverse and sometimes competing interests (Forester, 1989).

Although not necessarily formal theories, New Urbanism and Sustainability are both growing movements within architecture and planning that integrate issues of equity, although they deal with them through different processes. New Urbanism emerged from architecture and presents a new form of physical determinism in design and planning, seeking to reintroduce the physical design associated with traditional town planning (Calthorpe, 1993; Duany & Plater-Zyberk, 1992). Sustainability places planners and planning in the “triangle” of balancing economic growth, social equity and environmental protection (Campbell, 1996).

Susan Fainstein's Just City Theory presents a new theory for promoting equity in the age of globalization and neoliberal policy (Fainstein, 2010). A Just City focuses on diversity, democracy and equity, attempting to integrate these three concepts to produce justice and equity both in process and in outcomes. The Just City Theory attempts to address flaws in other contemporary planning theories or movements. Fainstein challenges the Communicative Planning Model as inadequate in dealing with structural conflict and challenges. As described by Fainstein, "*There is the assumption that if only people were reasonable, deep structural conflict would melt away*" (Fainstein, 2000). Fainstein argues that more than mere consensus-building is necessary to address deep structural inequalities; other forms of community engagement, mobilization and organizing will be needed to empower communities to address inequity.

Communicative planning also faces a challenge due to the structure of pluralism. Pluralism does not ensure equity. Put another way, dominant views or views supported by the majority are not inherently just, fair, or equitable. The Just City Theory is grounded in addressing social and geographic inequities and includes democratic participation (and decision-making) by marginalized groups, but this democratic approach includes democratic process as well as democratic outcomes. Moral neutrality cannot be the vantage point of communicative discourse and the Just City requires equity in process but also adherence to ensuring equitable outcomes.

Fainstein also critiques New Urbanism, questioning if New Urbanism is just bringing a return of the physical determinism that was seen in planning throughout various phases of planning theory, from City Beautiful to the modernist designs forced on communities and justified by Rational Planning Theory. Fainstein looks at the use of charrettes in being carefully orchestrated “engagements” with the public to convince the public of the New Urbanism vision for community as evidence to question the movement’s potentially undemocratic roots.

Research on the ability of New Urbanist planning charrettes in the Mississippi Gulf Coast to address equity issues provides some support for Fainstein’s New Urbanist critique. Talen’s research found the design- oriented New Urbanist approach incapable of addressing deeper structural and institutional challenges to supporting equitable policy, in particular affordable housing development in Post- Katrina reconstruction (Talen, 2008). Research by Jennifer Evans-Cowley and Andrew Canter on the construction of Mississippi Gulf Coast affordable housing via “Katrina Cottages” found a variety of local and state regulatory barriers to supplying affordable housing in rebuilding efforts, frustrating social equity and fair housing goals in coastal Mississippi redevelopment (Cowley & Canter, 2011).

In more recent work, Fainstein expands upon her Just City model and explores the role of diversity (both in the physical and social context) in planning practice and theory. In *“Cities and Diversity: Should We Want It? Can We Plan for It?”* Fainstein notes that

diversity in land uses and structures in the urban environment, a goal of New Urbanism, does not necessarily equate with social diversity. Fainstein also lays out her model for stimulating social justice with local urban policy while also noting the critical need for progressive political consciousness to make the Just City possible (Fainstein, 2005B). Fainstein questions the implied equity benefits of mixed- use development touted by New Urbanism, but notes that New Urbanist policy, if tied to progressive political consciousness, can prove beneficial in supporting the Just City.

Planning and Equity – Future directions and the bend toward justice

The planning field is a mirror of our larger society, reflecting the conflicts and our gradual evolution “or bend toward justice” on the path to social and racial equity. Planning’s evolution has also been historically fraught with conflict as the field attempted to balance its activist roots and more pragmatic technical orientation. Conflict would emerge from the chaos of post- industrial revolution urban space and continues in our contemporary debates in the field. Sociopolitical conflict and political power also are interwoven into this broader debate, capitalizing on planning movements to reshape urban spaces, for better or for worse.

Planning has been both a positive and negative influence on social and racial equity in the United States, but overall the field still “bends toward justice,” evolving with new insights and strategies to produce a more just city. The field will face new challenges.

Inequality is growing, cities are changing, and our nation is experiencing another major demographic transition.

Twenty- first century challenges abound for the planning profession. New models of urban redevelopment and New Urbanism continue patterns of displacement and marginalization. Aging suburbs are becoming the zones of distress and isolation for marginalized people, areas with limited planning tools to address them. Cities are still struggling to adapt to the decline of supported and assisted subsidized housing and the housing distress unleashed by the 2008 housing crisis. Declining federal support for traditional urban community development has created an environment where equity planners must learn to collaborate with other stakeholders and activists. It is noteworthy that one of the most well- documented place- and people- based interventions in the past two decades has been the Harlem Children’s Zone, an initiative led by educational advocates and not city planners (Erickson, 2012 and Dobbie et al, 2011).

Our society has experienced monumental demographic and economic change before, and historically, these transitions have produced negative outcomes for the “other,” whoever this population is. Our cities have “sorted” these populations into isolated areas lacking opportunity. Planning and planning research must address the challenges above, but also reengage its activist roots to prevent history repeating itself, to support truly just cities and a just society.

2.2. Part II – The Role of Equity Planning Theory in Supporting Equity Planning Practice

City planning theory has long been criticized for being disconnected from practice and the realities of the urban environment (Beauregard, 1984 and Sanyal, 2002). Specialization, bureaucracy and political interests have been identified as factors in planning practice that have widened the divide between theory and practice. Theorists have been criticized as being “*isolated from social conditions and planning practice.*” (Beauregard, 1990) As described by Beauregard:

“Instead of creating a discourse that might link knowledge to action in ways that would be open to democratic debate, planning theorists opted for relatively specialized formulations penetrable only by the initiated.” (Beauregard, 1990)

In *Planning Theory and the City*, Susan Fainstein argues that planning education undermines planning theory, primarily through segregating courses on theory, methods, context and objectives of planning and not deliberately linking theory to desired outcomes in practice. Fainstein suggests that this disconnect extends to scholarship that creates conversational silos pertaining to planning theory and planning practice (Fainstein, 2005). Planning theory’s “*isolation of process from context and outcome*” ultimately weakens its utility. (Fainstein, 2005)

I posit that these critiques are well- grounded but the criticism is too harsh, and that equity planning provides a case study of how relevant planning theory is in planning practice. Planning should be viewed as a young field that has wrestled with its identity and soul, with a primary divide appearing early in the formation of the field. By 1909 and 1910, a rift had formed between progressive activists and rational pragmatists and technocrats. A battle within the early years of the field, which was won by the pragmatists, shifted the field away from its activist roots (Peterson, 2009). This divide has emerged time and time again, taking on a façade of new theoretical dressing, but reoccurring throughout the profession's history.

As a field directly enmeshed within the messiness of the “real world,” planning practice and theory would be influenced and impacted by many external factors throughout history. Unlike many of the natural sciences or other more narrowly defined social sciences, planning has had to remain engaged as an applied field, complicating its theoretical development and practical application. Changes in technology, global macroeconomic trends, intellectual developments and social movements would directly impact the field. These macro forces could be as wildly divergent as the Civil Rights movement of the 1960's to the rise of the Conservative movement during the Reagan Administration. Through these turbulent times, planning has had to react to changing cities, changing societies and a changing planet.

I argue that planning theory has had a deep impact on practice and the form and function of contemporary cities, particularly in regards to aspects of equity in planning practice. Theoretical developments may not instantly make a linear impact in practice, but more informally and gradually seep into various forms of policy and action. Lindbloom's theories of incrementalism still remain valid in today's urban environment (Lindbloom, 1959). A pattern of impact that may be hard to ascertain in a snapshot but, when viewed through a longer temporal lens, can demonstrate profound impact (for better or for worse). Planning's real world application and multi-disciplinary nature may make the development of an overarching theoretical framework more difficult, but it also is a more adaptive and resilient profession, both in respect to theory and practice. Planning openly embraces insights from diverse and new fields of knowledge, a fact that may undermine its theoretical purity but creates a much more dynamic and relevant field.

In regards to equity planning, the following provides several examples of the long-term impacts of planning theory on practice and the shape and form of cities and regions across the globe. Equity in planning has been deeply impacted by several forms of planning theory. For example, Advocacy Theory, Communicative Theory and Progressive Regionalism are presented as three specific theories that have impacted equity planning practice. I close by reviewing the current state of equity planning theory. Further strengthening the bridge between equity planning theory and practice can be achieved by utilizing Friedman's call for "humanism, adaptation and translation" in planning theory (Friedman, 2008).

City Planning: Theory Translating to Practice

From a historical perspective the direct impact of planning theory on practice is clearly evident. A century ago, the City Beautiful movement transformed urban civic spaces in American cities and abroad. Evidence of the impact of City Beautiful is still visible in many cities today, from the early 20th century classical architecture still found in U.S. cities to Chicago's Lake Michigan waterfront (Wilson, 1989). The Garden Cities movement would spur the shape of new suburbs around the globe, influencing city development in Europe, Asia and North America (Ward, 1992). Although Homer Hoyt was not a planner, his theories and work contributed to Federal Housing Administration development guidelines and mid-century suburban retail development. Hoyt's work assessing the viability of residential areas at FHA, using a data-driven (if racially discriminatory) approach, would work to benefit America's emerging suburbs and prove very detrimental to policies impacting traditional urban areas (Beauregard, 2007).

Modernism and rational planning radically reshaped mid-century American cities. The rise of public housing and demolition spurred by urban renewal created the foundation of the contemporary 20th century city in America. The ultimately unsuccessful and unpopular policies were deeply influenced by dominant planning theories of the era (Teaford, 2000). Rational planning is still a dominant model in many part of Asia today. Even contemporary international civil unrest is rooted in planning theory, with Paris's early

20th century ethnic riots occurring in the shadows of ethnically segregated suburban modernist housing towers (Laurence and Vaisse, 2005).

The critique of rational planning should not be misinterpreted to suggest that rational planning no longer plays a role in U.S. planning. Although it is not the dominant planning theory, as it historically has been, rational planning is still very prevalent in American planning activities. Planning has been and continues to be very data-driven and informed by technical analysis. In fact, in the emerging era of big data, web-based data tools and expanded geographic information systems, we can anticipate aspects of rational planning to continue to be an important aspect of city planning.

Contemporary development also presents examples of planning and design theories translating into practice and the shape of cities. Although New Urbanism is an urban design philosophy and not a traditional planning theory, the principles of New Urbanism can be seen in mixed-use, pedestrian-oriented New Urbanist developments across North America and abroad (Trudeau, 2013). Theories of sustainable development have widely been embraced in concepts by local planning practitioners and directly in international and national policy.

John Friedman's 2008 article "The Uses of Planning Theory" tracks the historical influence of planning theory on practice, challenging the traditional conclusion that theory is an abstraction that has little bearing on the real world. Friedman identifies three key "tasks" that must be upheld to bring legitimacy to planning theory's utility to practice.

First, the need to articulate the “humanist” philosophical foundation for the profession, or in other terms, echoing the arguments of activists throughout the decades to illuminate and bring back the “morality and activist values” of planning into theory and practice. Second, theory must actively pay attention to the “adaptation” of planning theory into practice. Friedman notes that planning seeks to “close the feedback loop” between real world change and the profession (Friedman, 2008). Finally, planning theory should actively seek to integrate new and multidisciplinary perspectives on a continual basis into the field. Friedman emphasizes the role planning theory serves as a mechanism of “translation,” bringing in insights from many different fields to enrich the planning field (Friedman, 2008). Friedman argues that by undertaking these tasks, planning theory will be more dynamic and relevant to real world practice.

The experience of “adaptation” is historically evident in contemporary critiques of the rational planning and modernist- inspired mid-century Urban Renewal program. Teaford’s historical review of the Urban Renewal program (Housing Act of 1949) identifies the program’s poorly- constructed implementation, and not its goals, as the primary mechanism for its failure (Teaford, 2000). Avila and Rose’s *Race, Culture, Politics and Urban Renewal*, notes that local racial politics played an outsized role in the implementation of urban renewal activities (Avila and Rose, 2009). Urban Renewal’s implementation failure must also be viewed through the lens of federal suburbanization policies, policies that redistributed more federal resources to emerging suburbs, undermining the areas targeted by urban renewal. The 2011 documentary *The Pruitt-Igoe*

Myth, details the role of macroeconomic trends, structural and institutional racism, and shortsighted financial policy in bringing about the rapid demise of mid-century public housing in America (Freidrichs et al. 2011).

The critique of New Urbanist development also reflects Friedman's concept of adaptation from theory. New Urbanism has been both applauded and criticized for its tendency to increase home values (Eppli and Tu, 1999), thus increasing the likelihood of New Urbanist developments to produce economically exclusionary communities. Scholars have noted the failure of New Urbanism to appropriately account for diversity and its propensity for displacement (Day, 2003). Research has identified the failure of New Urbanist policies to account for broader barriers of institutional and structural racism (Talen, 2008; Cowley and Canter, 2011).

Susan Moore's 2012 study of New Urbanism's implementation in Toronto notes that developments represented a process of "typefication" where implementation of New Urbanist principles are "*underpinned by deeper, highly situated, constructions of aligned interests and emergent socio-political rationalities.*" (Moore, 2012) These various critiques are not necessarily aimed at the goals of New Urbanist thinking, but rather identify the failures and unexpected outcomes associated with its implementation or adaptation into practice. I would argue that instead of undermining planning theory, the ability to critique the translation into practice is fundamentally important to solidifying planning theory's relationship to practice and real world outcomes.

Advocacy Planning: From Theory to Translation and Practice

The work of Davidoff and advocacy or equity planners directly impacted the function and focus of planning practice. Advocacy planning would emerge as a product of the various social crises and movements of the 1960's, questioning not just planning's substantive approach, but the fundamental way planning disempowered those who were most impacted by its plans. As described in Tom Angotti's 2007 historical review *Advocacy and Community Planning: Past, Present and Future*:

“While its philosophical roots can be traced to the Enlightenment and liberal economic theory, advocacy planning was an innovation of the 1960s, a direct consequence of the engagement of urban planners in the Civil Rights movement, the struggles against the displacement of low-income communities by the federal urban renewal program. It also stemmed from and fed the opportunities for innovation offered by the federal War on Poverty, including the Model Cities Program. The theory of advocacy planning arose not simply from Paul Davidoff's mind but from the multiple practices by community activists and professionals to redress issues of racial and class oppression. It confronted a planning profession that focused narrowly on the physical city, rationalized the destruction of “slums” by urban renewal and sided with powerful real estate interests, and that was overwhelmingly a club of White males who claimed for themselves a position of technocratic superiority over protesting communities.” (Angotti, 2007)

Angotti's essay would continue to provide a case study of how advocacy planning would influence a variety of positive social justice changes impacting New York City. Environmental justice, community organizing, community development organizations, and various forms of participatory democracy were all legacies of the Advocacy Planning era (Angotti, 2007).

The New York City experience documented by Angotti is not unique. Despite the criticism and challenges encountered by the Advocacy Planning Model, as discussed earlier in this literature review, the Advocacy Planning era produced a dramatic transformation to the field of planning. In the years that would follow the birth of advocacy planning, planning practice permanently changed, with a new cadre of planning tools promoting advocacy and equity goals being adopted across the nation. Even contemporary tools, such as Community Benefit Agreements, are successors to the work of advocacy planners like Norm Krumholz, who documented the equity challenge of public-private partnership in urban development. Advocacy Planning Theory would leave a lasting mark on the practice of planning, integrating equity and advocacy concerns in a way that was unparalleled in planning history.

Communicative Planning and Deliberative Democracy: From Theory to Translation and Practice

Communicative Planning Theory would grow from the pluralistic planning models interjected into planning theory and practice during the infancy of the advocacy movement.

Communicative Planning theorists question the validity of “expert knowledge.” Dialogue and discourse are the source of finding “truth” and this can be achieved through communicative rationality (Habermas, 1984-1987). Forester’s work grounded Communicative Planning Theory on the principle that by providing access to public decision-making processes and adequate technical information, communicative action could empower marginalized and disenfranchised communities. Planners were essential to this process both as educators to bring information and access to marginalized groups but also as consensus builders, bridging diverse and sometimes competing interests (Forester, 1989).

Communicative Planning Theory would have a tremendous impact on planning practice and many forms of public sector relations with communities, both in the U.S. and abroad. Coexisting and integrating with theories of deliberate democracy, a significant sub-discipline would emerge in urban planning focusing on the art and craft of civic engagement, even in the face of continued resistance by some public policy stakeholders (Mannberg and Wihlborg, 2008). Mechanisms for ensuring engagement would infiltrate many aspects of public decision-making and more progressive communities would embrace the “transformative learning” produced by deliberate democracy (Friedman, 2008). Communicative planning would influence the shape of public engagement across the globe, most notably in Europe, Latin American and North America. The ultimate manifestation of communicative planning would be *Participatory Budgeting* which would

emerge in Latin America and produce very strong equity benefits to impoverished residents (Goldsmith, 1999).

Progressive Regionalism: From Theory to Translation and Practice

Another theoretical model that carries similar foundational elements of Fainstein's "Just City" is Progressive Regionalism. Similar to Fainstein's acknowledgement that space is critical to equity and justice, progressive regionalists focus on regionalism as the correct geographic scale to remedy spatial inequities and build collective action for social justice. As described in a 2009 symposium in the Journal of Planning Education and Research:

"Progressive regionalists strive to eradicate root causes of poverty, social injustice, and environmental degradation in ways that take into account the complex and multi-scalar flows of material, energy, and knowledge resources constituting our increasingly globalized world." (Pizzoli et. al., 2009, pg. 337)

In contrast to Fainstein's work, Progressive Regionalism emphasizes collaboration and interdisciplinary collective action as the primary activities to drive progressive regional change, with much of this advocacy centered on clearly communicating interregional dependencies between all communities and populations within the hypercompetitive global economy. Even the emergence of "mega regions" provides opportunities for broad social justice collaboration and movement- building to impact planning policy (Benner and Pastor, 2011). Where Fainstein emphasizes the role of planners and local planning policy,

progressive regionalists identify diverse, multidisciplinary, multi-racial regional coalitions as the principle drivers to address regional change.

The advocacy organization PolicyLink describes the principles of Progressive Regionalism (or regional equity) in their 2002 framing paper *Promoting Regional Equity*.

“A regional approach to equity supports rather than undermines the political power, social cohesion, and sense of place of all residents of the region, but particularly those communities who have long been denied effective voice as a result of regional forces.” (PolicyLink, 2002)

The Progressive Regionalism movement would influence practice in many ways. Progressive Regionalism has taken hold with many practitioners and advocates in the social justice community. Faith-based social justice organizing networks, such as Gamaliel and PICO, are utilizing the Progressive Regionalism frame to organize for social justice, while many advocacy organizations have sought to educate social justice advocates on Progressive Regionalism, to start regional equity networks, to bridge smart growth advocates and equity advocates, and to build capacity for a national movement for progressive regional policy (Pastor et. al. 2009). The values of Progressive Regionalism would also be integrated into the U.S. Department of Housing and Urban Development’s regional planning program for the Sustainable Communities Initiative. HUD SCI grantees were encouraged to create diverse consortia to develop long-term plans that addressed all aspects of sustainability, but were particularly attuned to social and racial equity concerns.

The Future of Equity Planning Theory: Crisis and Opportunity

Cities are once again burning in contemporary America. Mirroring the foundational challenges of the urban riots of the 1960's, 2014 and 2015 would produce riots and protests outside St. Louis and in Baltimore. Additional protests would occur in other locations of police shootings in response to police- community race relations. Racial discrimination, police brutality, inequality and neighborhood distress would once again have U.S. cities on edge. Neighborhoods in Baltimore, MD and Ferguson, MO would be looted and burned, and a militarized response from law enforcement would seem eerily reminiscent of the influx of the National Guard into U.S. cities during the 1960's. These contemporary crises reflect growing tensions in our globally interconnected world. Global economic crisis, climate change, growing inequality and environmental degradation have created an environment where planning is needed even more and where the field must more fully embrace its moral standing to address these global challenges (Friedman, 2008).

A 2015 essay in *The Atlantic's* CityLab blog posited that planning was experiencing an "identity crisis" (Flint, 2015). Anthony Flint's essay introduces the recognition of urban complexity, systems approaches to cities and concepts of "tactical planning," stating that the "revolt against traditional approaches to planning is being conducted by planners themselves." (Flint, 2015) The many complex, systemic and global contemporary challenges identified by Friedman and other scholars undergird this angst and desire for

change. Flint identifies a historical reference in the essay, noting that this is not the first time planning has undergone calls for change, with a particular emphasis on Jane Jacobs.

I would expand Flint's historical observation and identify not only Jane Jacob's work in the 1960's but Davidoff's advocacy movement, and the environmental movement of the 1970's, as an entire period of transformational thought in planning. Similar to today, the field needed to respond to the dramatic macroeconomic forces, policies and challenges facing our cities and society at the time, just as the field emerged in response to the chaos in late 19th century cities produced by industrialization. Planning theory and practice must consistently respond to our complex and changing world, or else it becomes irrelevant. Instead of being disregarded, planning theory, at least in the context of "humanism, adaptation and translation," is critically important and relevant, particularly for equity planning.

The Future of Equity Planning and Humanism:

*"Dr. King didn't get famous giving a speech that said, "I have a critique." It's time for us to start dreaming again and invite the country to dream with us." Van Jones, Author of *The Green Color Economy* and Former Obama Administration Green Economy Czar*

Scholars have repeatedly called for planning to reclaim its moral and social justice standing and strongly interject equity values into the field. Friedman describes this process

as incorporating “humanism” back into planning theory. But, Friedman’s suggestion mirrors the writings of others, such as Beauregard (1990) and the extensive scholarship of Fainstein (2000, 2005, 2006 and 2010). Historically, this call for claiming the high moral ground is reflected not only in the work of Davidoff (1965) and other equity planners but dates to the infancy of the field, as reflected in the conflict between social progressive activists and the advocates of City Beautiful.

The repeated calls for embracing justice and moral values reflects the ongoing tendency for planning to fall quietly back into its technocratic role. When you stand for nothing, you can stand for anything, moral or immoral, just or unjust. Planning without a vigorous set of values is impossible, and it will be subverted by existing power structures and economic or political interests. In supporting a just or equitable city, this is a great concern, given the radically imbalanced representation and disempowerment of marginalized communities. If planning will take on the monumental challenge of creating a just city and the transformative social change that will entail, the field and profession need a robust base of values to guide its actions and inspire society.

The Future of Equity Planning and Adaptation: Diversity of thought and conflict as strength

Friedman’s “adaptation” is another critical task for planning theory. As described earlier in this essay, adaptation is critical to understanding the relevance and interaction of theory to the complexity of the real world. Planning is a field that remains dynamic and

relevant to cities and society, and its theory must embrace this as an asset and not a deficit. Diversity of thought and challenges to conflicting theory (particularly those culled from practice) do not undermine the field but strengthen it. As described by John Forrester in 1994:

“Planning and planning theory are in no more crisis today than are the humanities and the social sciences generally. When different “paradigms” compete and pose problems differently, that is a sign of health, not intellectual poverty. We should stop looking for a unified field theory, a single common measure of excellence, or for a happy consensus in which architects and economists will love each other, and we should instead explore the real possibilities to improve planning practices so that they serve human need.” (Forester, 1994)

The act of understanding “adaptation” must be a critical part of advances in planning theory. For equity planning, this remains essential, as systemic and structural disadvantage can persist due to the imbalance of power within our institutions and society. Systems adapt and can undermine pro-equity policies as political and economic interests can intervene to impact implementation of well-grounded equity planning theories.

The Future of Equity Planning and Translation:

Building upon Friedman’s act of “translation” is necessary to the future of planning theory and equity planning theory. Planning has historically been a field which has

benefited from its ability to cull insights from a wide range of diverse scholarship and disciplines. As scholarship related to equity continues to evolve, planning must continue to embrace these new insights and utilize them to challenge and buttress existing theories.

Finally, planning like other technical or advanced fields, suffers from a lack of representation and diversity, in both scholarship and practice. The diversity challenge in planning does not just relate to race, but can also be extended to gender, socioeconomic status and other social intersections of U.S. society. For example, more than 80% of planning professionals are White and only 40% of the planning workforce is female (Owens, 2015). While the field must continue to seek more diversity so that it can better mirror the communities it serves, “translation” of insights will continue to play a role in providing a more equitable view of our society and cities. As described by Angotti in 2007:

“Today the proportion of people of color in the planning profession is still inadequate, and it is shocking that the proportion of African Americans in graduate urban planning programs hasn’t changed substantially and is still less than 3 percent nationwide. This suggests that advocacy will continue to come from outside the profession, even if everyone in the profession has to read Davidoff’s landmark essay to get a degree.” (Angotti, 2007)

We should challenge the often- cited conclusion that planning theory is irrelevant to practice. History and contemporary practice demonstrate the role and influence of planning theory on the way we plan for and reshape our neighborhoods, cities or regions. For better

or for worse, theory has always incrementally infiltrated practice and innovation in the field. I argue that the dynamic and sometimes disjointed state of planning theory is an asset to an engaged and applied field attempting to have an impact in the complex and dynamic 21st century city. Planning theory can play a critical role for presenting the moral foundation of equity planning and justice in the city, provide a necessary “feedback loop” to understand how ideas adapt to socio-political realities, and provide a translational gateway to integrate new insights and knowledge from diverse fields of study.

2.3. Part III - Equity as a Plank of Sustainable Development and Planning Theory and Practice

Emerging in the late 20th century, Sustainable Development Theory and sustainability planning practice would have a substantial impact on U.S. planning discourse, practice and education. Sustainability as a concept has become a common (and often ambiguous) terminology used in many sectors of society, ranging from corporations to national and international government bodies. Theories of sustainable development in planning, present a vision for balancing economic development, environmental protection and social equity, known as the three “e’s” of sustainable development (Presidents Council, 1996). The three pillars are often conceptualized in organizational or business metrics as the “triple bottom line” (Slaper and Hall, 2011). In the context of planning and development in the United States, sustainable development has been used in a wide variety of applications from local planning to more recently, regional/state planning and federal policy initiatives.

Given the growing popularity and utilization of sustainable development in planning, and its explicit references to social equity as a primary goal, sustainability planning represents one of the best opportunities to address issues of social equity in contemporary planning practice. Despite the potential to become the preeminent planning model to take up social equity concerns, many challenges have been identified in utilizing sustainable development to address social equity concerns.

The following response focuses on two key points: first, the evolution of how social sustainability has been defined; and, second, identifying critical challenges to supporting social sustainability in planning practice in the United States, focusing on conflicts that must be addressed for social sustainability to reach its potential as a model of transformative change in U.S. cities. While referencing international scholars in relation to defining social sustainability, the discussion of challenges will focus on the United States, thus focusing on a localized context for understanding social sustainability related to the nation's unique social, economic and political history.

Social Sustainability: Origins

Sustainability as an economic, social and ecological concern would emerge from the increased environmental and social consciousness of the 1960's and 1970's (Du Pisani, 2006). The Brundtland Commission's historically significant report "Our Common Future" would be the first robust attempt to define sustainability and counter traditional international development models of the time period (World Commission, 1987). The

Commission's report affirmed the inseparable relationship between environment and development, while also expanding the concept of "environment" to be inclusive of not just physical ecosystems but social and political systems as well. The primary early economic lens of sustainability related to the relationship between the more developed Western economies and the people of developing nations. Social equity as defined by the Commission also emphasized "intergenerational equity" or the ability for future generations to prosper.

Defining Social Sustainability

Although the Brundtland Commission's work would introduce social sustainability into development discourse, scholarship and policy pertaining to social issues in sustainable development was not as robust as environmentally- focused work in the early years. The concept of social sustainability would be bolstered in the 1990's through scholarship and policy development, such as the United Nation's Agenda 21 (Colantonio, 2007).

Anand & Sen would challenge sustainability's intergenerational equity emphasis as insufficient in the 1990's (Anand & Sen, 1995 and 2000). Amarta Sen would extend his models of human development, human "capabilities" and freedom into the sustainability debate (Sen, 1992; Anand & Sen, 1996; Anand & Sen, 2000; Sen, 2000; Sen, 2013). Sen's models, which would later become the foundation of the United Nation's Human Development Index, would advocate moving beyond meeting basic human needs to ensuring agency and other aspects of human freedom. In the context of social sustainability,

Sen would emphasize equity, diversity, social cohesion, quality of life, democracy and maturity.

Scholar Andrea Colantonio, who has written extensively defining and measuring European social sustainability, established a robust definition of social sustainability based on the diverse existing literature (Colantonio, 2011; Colantonio & Dixon, 2011, Colantonio, 2009; Dixon & Colantonio, 2008; Colantonio, 2007). Colantonio builds upon the concepts put forth by Sen, but elaborates more fully on the more pragmatic attributes of social sustainability in the context of urban development:

“Most specifically, social sustainability refers to the personal and societal assets, rules and processes that empower individuals and communities to participate in the long- term and fair achievement of adequate and economically achievable standards of life based on self-expressed needs and aspirations within the physical boundaries of places and the planet as a whole. At a more practical level, social sustainability stems from improvements in thematic areas of the social realm of individuals and societies, ranging from capacity- building and skills development to environmental and spatial inequalities. It can be seen how social sustainability blends traditional social objectives and policy areas such as equity and health with issues concerning participation, needs, social capital, the economy, the environment, and more recently, with the notions of happiness, wellbeing and quality of life.”(Colantonio, 2007, Page 7)

Colantonio & Dixon (2008 and 2010) would note the overt emphasis in European urban transformation toward physical and economic development, and called for greater emphasis on human development, social capital and connectivity. Of particular concern for social sustainability in the European urban context was the displacement of marginalized communities due to intensive urban regeneration.

Dempsey et al. would produce the most complete list of detailed characteristics or “dimensions” of social sustainability based on their literature review in 2011 (Dempsey et al. 2011). Their dimensions of sustainability included twenty-seven factors divided into non-physical and predominately physical themes. The diverse factors include components ranging from social capital and social networks, to employment and training, to built environment characteristics and proximity to particular assets or resources (or freedom from living near detrimental urban conditions). Figure 1 is a reproduction of the Dempsey et al. list of social sustainability attributes in 2011.

Figure 1: Social sustainability measures identified by Dempsey et al. (Reproduction of Table 1 in Dempsey et al. 2011)

| Non-physical factors | Predominantly physical factors |
|---|--|
| <ul style="list-style-type: none"> • Education and training • Social justice: inter- and intra-generational • Participation and local democracy • Health, quality of life and well-being • Social inclusion (and eradication of social exclusion) • Social capital • Community • Safety • Mixed tenure • Fair distribution of income • Social order • Social cohesion • Community cohesion (i.e. cohesion between and among different groups) • Social networks • Social interaction • Sense of community and belonging • Employment • Residential stability (vs turnover) • Active community organizations • Cultural traditions | <ul style="list-style-type: none"> • Urbanity • Attractive public realm • Decent housing • Local environmental quality and amenity • Accessibility (e.g. to local services and facilities/employment/green space) • Sustainable urban design • Neighbourhood • Walkable neighbourhood: pedestrian friendly |

How social sustainability is measured and analyzed for policy and accounting purposes is also important. Researchers have found that metric and accounting systems developed for social sustainability deemphasize social capital and social connectivity. Magee et al. (2012 and 2013) would build upon this growing critique that the emphasis on metrics for sustainability was too top down, and undermined the importance of social connectivity and social capital. The authors propose the need for both “bottom up” and “top down” metrics, including participatory engagement tools to address this need (Magee et al. 2012, Magee et al. 2013).

Definitions of social sustainability have evolved significantly in the two and half decades since the Brundtland Commission's 1987 report. While initially neglected in sustainability discourse, social sustainability gained prominence in the 1990's with tremendous scholarship advancing the concept since 2000. What was once narrowly defined as "intergenerational equity" now is broadly defined to encompass a wide array of the facets of human settlement, social capabilities and aspects of social capital. This robust definition has promoted improved social sustainability efforts around the globe. But, a challenge created by this wide definition, similar to the challenge faced by sustainability as a whole, is when "sustainability" and "social sustainability" are interpreted as a "fuzzy concept." As described in the following section of this essay, the ambiguity in defining sustainability contributes to a lack of focus in implementation and action.

Challenges to Social Sustainability I: Sustainability Defined as a "Fuzzy Concept"

The inconsistencies and lack of clarity in defining social sustainability create a challenge to sustainable development planning and policy. Michael Gunder notes that sustainability is a "fuzzy concept," one which a common framework is interpreted and defined differently by various stakeholders. As noted by Gunder:

"Sustainability is a concept that everyone purports to understand intuitively but somehow finds very difficult to operationalize into concrete terms. Regardless, no planning or policy document can omit the concept these days, because sustainability, or 'sustainable development,' is declared as the ultimate planning

goal although it is not usually specified what it means and exactly how it is to be achieved.” (Gunder, 2006, Page 211)

Gunder further elaborates on the common use of terms such as sustainability, social justice and just city in planning, but with few common definitions on which to base our actions. As described by Gunder:

“Yet, what unites planners (and other professions) as a discipline is fundamentally their common or shared lack of knowledge. No one knows, let alone can succinctly or comprehensively and universally define, what a sustainable city, social justice, or the common good, for that matter, actually is! At best, we can only guess toward some vague notion that lacks a clear focus.” (Gunder, 2006, Page 212)

Although this “fuzzy concept” can be more socially and politically palatable due to its vague definitions, this can also prove problematic in understanding which particular policies, programs and actions are necessary to produce sustainable communities, just cities or social justice. Given the unequal power dynamics in contemporary planning, these vague definitions could also prove detrimental to goals of social equity, with the vague definition of sustainability (and fuzzy concepts such as social equity and social justice) being misused to tailor policies and programs to the benefit of particular stakeholders.

Survey research supports Gunder’s assertions. Surveys by Maria Manta-Conroy of planning agencies in Ohio, Kentucky and Indiana, found general understandings of

sustainability concepts but did not recognize sustainability planning as distinct from traditional “good planning” practices.

“The third finding emphasizes a continual challenge to sustainable development: It remains a buzzword concept that has not established itself yet as a distinct planning paradigm for practitioners. It is seen by respondents as analogous to traditional good planning practices.” (Conroy, 2006)

A follow-up study found that familiarity with sustainability had a direct impact on the implementation of sustainability activities and that limitations in sustainability discourse were leading to more piecemeal approaches to sustainability planning, limiting the critical need for integration of various activities to support sustainable development. This limitation is cause for more structured dialogue and guidance with planning practitioners (Conroy & Iqbal, 2009).

Scholars have also noted the definitional challenges particular to social sustainability. As Andrea Colantonio described in 2007:

“...there have been very few attempts to define social sustainability as an independent dimension of sustainable development. Furthermore, no consensus seems to exist on what criteria and perspectives should be adopted in defining social sustainability. Each author or policy maker derives their own definition

according to discipline-specific criteria or study perspective, making a generalised definition difficult to achieve.” (Colantonio, 2007, Page 4)

Critiques of definitions for social sustainability have also emphasized challenges facing social sustainability, which contribute to it becoming a “fuzzy concept.” First, social sustainability in practice is more likely to mirror political ideologies and interests instead of being grounded in robust theory (Littig & Griessler, 2005). Social sustainability is also not hampered by a lack of sophisticated models for social measurements of policy; many such metrics exist, in various fields of social policy. Unfortunately, many of these rich tools from other disciplines have not been well- integrated into social sustainable development theory and practice (Colantonio, 2007).

Social sustainability as a “fuzzy concept” creates a challenge in influencing impactful development policy. The wide array of principles, metrics and other definitional terms for social sustainability creates incoherence and uncertainty around policy choices to support socially progressive development practice.

Challenges to Social Sustainability II: The Imbalanced E – Equity Undermined in the Context of Economic and Environment Goals

Although sustainable development presents a framework to resolve development conflicts in order to balance equity, environmental goals and economic development, many social equity advocates and some scholars have expressed concern that equity falls short in

sustainability planning, becoming a subordinate goal to environmental and economic concerns. Differences in perspective among planning practitioners have also been noted as a primary challenge in producing a truly balanced model of sustainable development, with professional sub-disciplines influencing the area of planning action professionals undertake in sustainability planning. Some evidence supports this concern. An early study by Warner found few cities acknowledge environmental justice as a sustainability concern (Warner, 2002).

A 2006 survey of city administrations by Devashree Saha and Robert Paterson found limited evidence that cities were fully embracing equity and social justice issues in sustainability efforts (Saha & Paterson, 2008). Survey respondents noted that lack of funding and the scope of social equity problems made addressing equity difficult through sustainability efforts. Respondents were also far less likely to identify social equity as important of a goal as economic health and environmental health, and tended to frame responses in environmental and economic terms. Even cities that were identified as national leaders in sustainability planning paid limited attention to social equity concerns, as described by Saha and Paterson:

“Examination of few city sustainability efforts lends support to the argument that, even where city governments have made sustainability a high priority goal, there is little evidence to date of programs that connect sustainability to social justice issues...What this means is that many U.S. cities that otherwise appear to take

sustainability very seriously do so largely without significant awareness or concern for the social justice and equity implications of their sustainability efforts.” (Saha & Paterson, 2008, Pg. 31)

Campbell argues that fundamental conflicts exist among the goals of economic development, environmental protection and social equity. Sustainable development presents a vision of balancing these interests, but this vision should not be perceived as utopian, or as promoting a vague idealism in believing these intersecting goals are easily resolvable. The sustainability movement should provide a framework to “*stir up conflict and sharpen the debate*” among these three domains (Campbell, 1996).

The ability of planners to effectively support balancing the three goals of sustainable development is challenging due to professional, fiscal, legislative and political constraints. Space is essential to the equity planner representing the domain of “*access and segregation*” for marginalized groups. Sustainable development presents a space to resolve property and development conflicts in order to balance equity, environmental goals and economic development. It also presents a theoretical framework to marry both social theory and environmental science.

Although sustainability has great potential to embrace equity and produce the “just city,” conceptual challenges or conflicts embedded in the sustainability model will present challenges. From the environmentalist’s view of sustainability, nature is viewed as the ideal, which was disrupted by social development. From this perspective nature is

considered an idealized space and inherently equitable. But equity is defined by social norms not laws of nature, so environmentalists must also expand the scope of equity to include future generations and equity across species.

Campbell takes a communicative turn in thinking about the role planners should play in the sustainability movement. According to Campbell, for planners to effectively promote a just version of sustainability, the profession must serve the role of conflict resolution and identify “creative, technical, architectural and institutional solutions” while presenting a “substantive vision” for sustainability. This conflict resolution should include working to bring a new “language” to conflict, translating for different interests who operate within different fields. Balancing environmental goals with equity goals or social justice requires ensuring land development is not uneven in nature, contributing to the variety of land-based deprivations (or levers of disadvantage) facing marginalized communities (Campbell, 1996).

Campbell predicts if planning does not embrace this role, sustainability in practice will produce meaningless results:

“I suspect that planners' criticisms of the sustainable development movement in the coming years will parallel the critique of comprehensive planning 30 years ago: The incrementalists will argue that one cannot achieve a sustainable society in a single grand leap, for it requires too much social and ecological information and is too risky. The advocacy planners will argue that no common social interest in

sustainable development exists, and that bureaucratic planners will invariably create a sustainable development scheme that neglects the interests both of the poor and of nature. To both groups of critics, the prospect of integrating economic, environmental and equity interests will seem forced and artificial. States will require communities to prepare "Sustainable Development Master Plans," which will prove to be glib wish lists of goals and suspiciously vague implementation steps. To achieve consensus for the plan, language will be reduced to the lowest common denominator, and the pleasing plans will gather dust." (Campbell, 1996)

Campbell's foresight in this prediction is very interesting given the critique of many sustainable development plans. Additionally, the conflicts emerging from equity and environmental goals have been documented in the planning field. Sustainability-based smart growth plans have been criticized for "downzoning" and disempowering development opportunities in poor rural African American communities in the U.S. South (Reece et al. 2007).

Recently, conflicts have emerged pitching Civil Rights advocates and smart growth advocates against each other in transportation policy. The NAACP of Cincinnati protested and took political action against streetcar expansion, and Civil Rights advocates in the San Francisco Bay area successfully litigated against expansion of the Bay Area Rapid Transit System. Both cases were protests against smart growth policies that were seen as taking vital resources away from low-income communities of color, as both expansion plans were

occurring simultaneously or soon after reductions in bus- based transit service, which is heavily used by low- income communities of communities of color (NAACP 2009 and Public Advocates, 2009).

Two studies have focused on the environmental vs. social equity conflict in leading cities for sustainable development in the U.S., Austin, TX and Portland, OR. Tretter’s research suggests that sustainable smart growth planning in Austin, TX selectively favored environmental principles over social equity concerns in the poorer and more racially segregated East Austin area (Tretter, 2013). Goodling et al. found Portland’s sustainable development approach has worked to push poverty out of the core of the city, producing a form of “eco-gentrification.” (Goodling et al. 2014)

Challenges to Social Sustainability III: Balancing future generation’s needs vs. present needs – does intergenerational equity ignore inequity today?

“Frankly, I have yet to engage in a direct-action campaign that was "well timed" in the view of those who have not suffered unduly from the disease of segregation. For years now I have heard the word "Wait!" It rings in the ear of every Negro with piercing familiarity. This "Wait" has almost always meant "Never." We must come to see, with one of our distinguished jurists, that justice too long delayed is justice denied.” – Dr. Martin Luther King Jr. Letter From a Birmingham Jail. April 16th 1963

Another challenge in addressing equity through sustainability is defining equity for whom, and balancing intergenerational equity concerns (primarily addressed through environmental preservation) with equity for contemporary marginalized groups. Does the overt emphasis on intergenerational equity displace concern for today's marginalized people? Does intergenerational equity seek to favor the continuation of privilege and wealth held by wealthier White environmental activists toward their future generations, while ignoring the deprivation felt in pockets of poverty around the globe?

Intergenerational equity has been a long-standing focus of sustainability, thus ensuring policies provide "fair" or equitable access to a healthy environment and resources for future generations. In 1996, Anand and Sen noted the disservice placed on today's marginalized people when using the lens of intergenerational equity. They challenged the sustainability movement to focus as much effort on addressing injustice in today's world as they do on intergenerational equity: and

"We cannot use up, or contaminate, our environment as we wish, violating the rights and interests of future generations. The demand of sustainability is, in fact, a particular reflection of universality of claims-applied to future generations vis-à-vis us. But that universalism also requires that in our anxiety to protect the future generations, we must not overlook the pressing claims of the less privileged today. A universalist approach cannot ignore the deprived people today in trying to prevent deprivation in the future." (Anand & Sen, 1996)

Anand and Sen posit a contemporary human development approach is critical in supporting equity and ensuring today's marginalized people receive the same "respect" as future generations. Other scholarship has validated Anand and Sen's concerns that equity's representation in sustainability tends toward intergenerational equity. In *Equity and the environment: social justice today as a prerequisite for sustainability in the future*, author James Boyce notes that the successful efforts to promote sustainability have focused great attention on intergenerational equity, but not sufficiently prioritized contemporary social justice concerns. Boyce finds this shortcoming to address social justice ultimately detrimental to the environmental goals of intergenerational equity.

Boyce also notes that sustainability must take into account the role present day inequity plays in perpetuating environmental degradation:

"As poverty deepens, the imperatives of day-to-day survival often compel the poor to degrade the environment." (Boyce, 1995)

Boyce calls for sustainable development to expand its scope to support social sustainability, by focusing on social justice and democracy (Boyce, 1995). As described by Boyce:

"The quest for sustainable development does not merely require that social decisions incorporate environmental costs and the welfare of future generations. It also requires

a fundamental reappraisal of the current relationship between growth and efficiency on the one hand, and equity and democracy on the other.” (Boyce, 1995)

The need to balance social sustainability and democracy with intergenerational equity is relevant to U.S. planning issues. For example, there is a natural conflict embedded in seeking to address the social goal of fair housing (which will require additional construction of affordable housing in new growth areas) with environmental goals (of concentrating development into existing communities and limiting new housing growth). Although this conflict is manageable, it highlights the embedded conflicts that may arise in attempts to use the sustainability framework to guide planning and development policy in the U.S.

2.4. Part IV: The Theoretical Foundation of SCI

The SCI's regional planning grant program was reflective of many theoretical elements described in this literature review. SCI was obviously grounded in sustainability concepts, bridging issues of economic, equity and environmental sustainability within planning. Aspects of New Urbanism were also evident in the SCI livability principles. SCI exemplified the Communicative Planning Model. The regional planning program's overt focus on regional deliberation and robust community engagement reflected its communicative orientation. SCI was also grounded in Rational Planning Theory, focused on intensive data- driven analysis and scenario planning. Capacity builders such as "Place Matters" provided scenario planning tools for grantees. The data- driven orientation was

also evident in equity aspects of SCI, particularly in the FHEA, which focused extensively on evaluating equity data metrics for grantee regions.

The equity component of SCI was influenced by various strands of racial and social justice theories. Critical Race Theory was very evident in the program's design and implementation. Derrick Bell's interest convergence dilemma can be seen in the framing of equity concerns in SCI. Focus on the broader economic impacts of supporting equity was a communication point for grantees, and this framing was encouraged by HUD's capacity builders. The importance of historical analysis in Critical Race Theory was represented in the FHEA, which encouraged grantees to explore historical factors influencing present-day patterns of segregation and opportunity isolation.

The integration of Critical Race Theory should not be surprising considering that President Obama was once a law professor teaching Critical Race Theory (and other aspects of Civil Rights law) at the University of Chicago (Gahagan and Brophy, 2014). President Obama's background in Critical Race Theory was utilized by conservative groups as a point of criticism. Conservative critics disseminated a video of the future president publically (and warmly) acknowledging the importance of Derrick Bell's scholarship at an event to label Obama as a racial radical (Oremus, 2012).

Other equity planning theories also were evident in SCI's design. SCI's approach mirrored the model of Progressive Regionalism. PolicyLink, a major proponent of Progressive Regionalism, was the lead equity capacity builder for the program. Manuel

Pastor, a leading scholar of Progressive Regionalism was also part of the equity capacity-building team. The Geography of Opportunity and Opportunity Mapping/Opportunity-Based Housing theories were integrated into the analytical components of the FHEA. My personal engagement with the FHEA as a capacity builder was related to my experience developing the opportunity mapping methodology. In summary, SCI represented a hybridized planning model of communicative rationality, but with a strong and robust equity component.

2.5. Part IV: Evaluating Plans and the Persuasiveness of Planning Arguments for Equity

Planning has traditionally suffered from a void of evaluation activities or strong evaluation models for measuring planning outcomes (Talen, 2006a; Talen, 2006b). Historically, planning evaluation methods were disconnected from traditional evaluation literature concerns, such as quantitative vs. qualitative methods, intersections with theory, evaluator bias and performance metrics. In contrast, early planning evaluation methods research focused on “what to evaluate, how to evaluate, and the potential irrelevance of evaluation.” (Waldner, 2004) Evaluation is rarely a component of the planning process and the integration of an independent evaluator involved in the process, as in other fields, is not common (Oliveira & Pinho, 2010).

Planning evaluation studies and methodological advancements have expanded substantially in recent years. Evaluation literature for methods to address plan quality

evaluation expanded substantially in the past two decades, with more than 45 articles published in the field since 1994 and 15 of these articles published between 2010 and 2014. The growth of plan content evaluation is due to it being an “accessible” process, with agreement over core principles, the relatively easy access to the variety of planning documents, and the potential for linking theory to practice through evaluation (Lyles & Stevens, 2014). Despite the growth in evaluation studies, rigorous evaluation is still primarily conducted by scholars and practitioner evaluations generally focus on a binary identification (Yes/No) of plan elements (Berke & Godschalk, 2009).

Methodological frameworks and models for plan evaluation have evolved alongside the growth in evaluation studies. In 1997, William Baer developed a typology of plan evaluations, which includes plan assessment (does plan demonstrate goals and values); plan testing (plan alternatives evaluation); plan critique by peers and comparative planning evaluation (plans compared to each other); and “post hoc” evaluation of plan outcomes (Baer, 1997). Baer’s additional criteria for plan assessment include: adequacy of content; rational model considerations (problem identification, goals objectives and tone); procedural validity (groups involved in formulation and data used); adequacy of scope; guidance for implementation; data and methodology; format; and communications quality (Baer, 1997).

Since Baer’s publication in 1997, methods for understanding the dimensions of plan quality have been addressed through multiple ways in the literature. Quality could be

related to the quality of a plan's internal content or the plan's reflection of external stakeholder/community input and values. Quality measures could focus on whether plan components are more general "direction setting" or more "action-oriented." Berke and Godschalk's meta-analysis of plan quality evaluations found strong internal consistency in plans, and strong results in issue identification, implementation and monitoring. Their analysis identified poor outcomes for their "direction setting frameworks" (which include facts, goals and policies) (Berke & Godschalk, 2009).

Quality could also be measuring the relationship between plan analysis and outcomes or its persuasiveness. Quality evaluations generally utilize content analysis to identify if specific goals or issues are represented in plans (Lyles & Stevens, 2014). Berke and Godschalk identify two conceptual dimensions for plan quality evaluation: internal plan quality (including content metrics related to issues identified, fact base and policy frameworks identified) and external plan quality (which identifies if plans reflect stakeholder values and local conditions in the plans scope) (Berke & Godschalk, 2009). A synthesis of Berke and Goldschalk's evaluation criteria for plan quality is summarized in Figure 2.

Figure 2: Criteria for plan quality evaluation, adapted from Berke & Godschalk, 2009.

| | |
|-------------------|---|
| Internal Criteria | <p>Issue Identification & Vision: Description of community needs, assets, trends and future visions.</p> <p>Goals: Reflection of public values that express desired future.</p> <p>Fact Base: Analysis of current and future conditions.</p> <p>Policies: Principles to guide public and private actions or policy.</p> <p>Implementation: Commitment to carry out policy actions.</p> <p>Monitoring & Evaluation: Tracking community impacts.</p> <p>Internal Consistency: Mutually reinforcing visions, goals & policies.</p> |
| External Criteria | <p>Organization and Presentation: Understandability for wide audiences.</p> <p>Inter-organizational Coordination: Integration with other plans/policies.</p> <p>Compliance: Consistency with purpose of planning mandate.</p> |

Lyle and Stevens suggest that the primary distinction in evaluation approach is between plan content analysis and plan quality analysis, and that both are necessary for a robust and strong evaluation. Content evaluations identify the inclusion of content through a systematic content analysis. Content analysis methods emerged from the field of communication and cover a variety of potential sources of content, as described by Berke and Godschalk:

“Content analysis is a research technique for the objective description of the content of information contained in a written document like a comprehensive plan, oral message like radio and television broadcasts, and tape recordings of interviews.”

(Berke & Godschalk, 2009)

In contrast, a plan quality evaluation integrates normative criteria for evaluating plans, based on best practices of theory. As described by Lyle and Steven in 2009:

“A successful plan quality evaluation will consist of a well-executed plan content analysis and provide strong theoretical arguments for measures of plan characteristics used. Moreover, plan quality evaluation can be linked to plan outcome evaluation by validating that certain plan characteristics are linked to desired outcomes.” (Lyle & Steven, 2009, Page. 434)

Gene Bunnell and Edward Jepson’s *The Effect of Mandated Planning on Plan Quality: A Fresh Look at What Makes “A Good Plan”* builds upon plan evaluation research, deepening the exploration into if planning mandates impact plan quality (Bunnell & Jepson, 2011). The authors denote and refresh the debate internally within plan review literature regarding prescription, and mandates versus persuasion and voluntary compliance. They also reiterate the importance of integrating Baer’s categorization of different types of plans and their purpose in evaluation.

The authors develop a 31 part criteria specifically emphasizing the communicative and persuasive qualities of plans for plan evaluation, engaging issues such as uncertainty, stimulation of alternative visions, the relationship between policy decisions in outcomes, and the use of narrative storytelling. The authors emphasize several key elements in criteria development, the use of visual imagery, avoiding long lists of goals without detailed

implementation strategies, visual design, relevant data and analysis, and accessible/informative executive summary.

Baer and the authors' discussion on persuasion are valid but incomplete. Their critique does not incorporate the implicit aspect of communication, nor does it speak to the diversity of communication styles and capabilities. Implicit communication and framing are critical in influencing the adoption of planning outcomes, particularly in regards to issues of equity. People use "frames" or schema to understand information in our complex world. These frames are built from experiences, information, and other implicit biases and help guide decision-making, especially implicit decision-making. Frames can be positive or negative and the way information is "framed" can be very influential in respect to how people respond.

For example, affordable housing has consistently been framed in recent decades to make it as politically palatable as possible. Once referred to as low-income housing, this terminology was viewed by some as a frame of government dependency or welfare, or in more simplistic terms "takers" and not "makers" in the political language of the 2012 presidential election. In recent decades, low-income housing has given way to references more broadly to "affordable" housing and more recently, "workforce housing." Workforce housing is a frame that implies housing for the "working class," an attempt to frame low-cost housing in a way that does not trigger images of public welfare or government dependency. Similar framing can be seen in descriptions of "mixed-income" housing.

A growing body of research has identified how these schema or implicit frames can be profoundly biasing, producing a significant impact on attitudes and associations in relation to race, class, gender or equity. Implicit bias was originally defined as implicit social cognition and included implicit attitudes, prejudices and perceptions of self (Greenwald and Banaji, 1995; Bar-Anan and Nosek, 2009).

Implicit social cognition should cause us to re-examine our models for understanding prejudice in a way that incorporates unconscious responses grounded in the limbic system that lead to unconscious racial attitudes (Massey, 2007). This theory, often termed “implicit bias” or “implicit association,” focuses on the role of implicit schemas in people’s perceptions of “others” and how these implicit schemas may impact their opinions in regards to issues of equity (Bar-Anan & Nosek, 2009). Since being first introduced in the field of psychology, the definition of implicit bias has been refined considerably, as described by the Kirwan Institute for the Study of Race and Ethnicity:

“Implicit racial bias is denoted by subtle unconscious negative attitudes toward members of other-race groups. These attitudes may include fear, animosity, distrust, and superiority. Typically, implicit bias operates exclusively in our “unconscious mind” and is beyond our day-to-day perception. Implicit bias is fueled by a set of “symbolic attitudes” that develop in our unconscious mind over many years. These attitudes include positions on issues like race or liberal/conservative political ideology.” (Rudd et. al, 2008)

These categorical schema are a natural part of the human condition and built from years of experience and implicit memories that produce subconscious attitudes toward certain groups or populations (and by extension, toward policies which would address inequities facing these populations) (Massey, 2007). Framing and the role of implicit bias are seen as critical new domains of intervention in broader social movements. As described by Robert Benford and David Snow, framing processes are a “central dynamic in understanding the character and course of social movements.” (Benford & Snow, 2000) Similarly, William Julius Wilson argues these frames and implicit associations are critical in implementing public policy responses to racial inequity and poverty:

“One thing I know is that it’s extremely important to discuss how race and poverty are framed in public policy discussions. How we situate social issues in the larger context of society says a lot about our commitment to change.” (Wilson, 2009)

Drew Westin’s *The Political Brain: The Role of Emotion in Deciding the Fate of the Nation* explores the role of implicit bias in public opinions and contends that without careful framing to either expose or shift biased schemas, promoting issues of equity will be difficult. Westin posits that unconscious perception about race and “others” are more significant and biased than conscious attitudes; thus, framing must speak to both the conscience mind and the unconscious mind (Westen, 2007). Staats (2015) notes the challenge posted by implicit bias in the context of race, space and housing:

“Due to implicit bias, our perceptions of what makes a good neighborhood are already affected by race-space associations. In fact, implicit bias can affect housing purchases beyond one’s rational judgment of factors such as safety, pricing, and school options.” (Staats, 2015)

Research suggests that framing can be powerful in building support for planning outcomes. Edward Goetz’s *Words Matter: The Importance of Issue Framing and the Case of Affordable Housing* directly addresses framing (and indirectly speaks to issues of implicit bias) in public perception of affordable housing. Goetz found that reframing affordable housing had a substantial impact in public attitudes toward affordable housing. Goetz noted that the term “affordable housing” was “stigmatized and perhaps associated with race” (Goetz, 2008). Words triggered opposition to affordable housing policy, as described by Goetz: *“Words do matter. The White, non-Hispanic suburban residents in this sample rejected the idea of affordable housing by a margin of 9.2 percentage points. When given the same policy idea with a different name, lifecycle housing, non-Hispanic Whites favored it by a 21.4% margin, a swing of over 30 percentage points.”* (Goetz, 2008)

Technological and cultural shifts in communication should make us question the importance of long- written planning documents. In addition to “plans,” are other multi-media or new media tools being utilized to communicate plan content? If plans are to be inclusive and empowering communication mechanisms then they should also be viewed through the lens of multi-culturalism and access. Are plans accessible in multiple languages

for linguistically isolated households? Are plans written in language accessible to the broader population? National data indicates 14% of the population is functionally illiterate and 21% of adults read below a 5th grade level, thus planning communication must be accessible to the broader public in the context of issues like literacy and language (Huffington Post, 2013).

Chapter 3. Methodology

This research is a formative program evaluation of the Sustainable Communities Initiative (SCI). This research seeks to understand if the SCI's effort to affirmatively further fair housing and support regional equity led to strong regional sustainability plans. This research posits that HUD's efforts to produce better guidance around equity and sustainability planning would address some of the shortcomings of previous HUD efforts to support equity planning and affirmatively further fair housing through regional strategies.

The U.S. Department of Housing and Urban Development's Sustainable Communities Initiative provided a planning model for regional sustainability planning that incorporated a strong equity mandate and provided substantial technical assistance to support equity goals. The SCI regional planning program was a communicative rational model of planning, utilizing intensive deliberation and data-driven analysis to develop regional plans. Given the opportunities for the SCI to introduce new approaches to supporting social equity and fair housing in planning practice, my research questions probe how planning practitioners and other stakeholders involved with the SCI understood and incorporated social equity within the broader framework of sustainability planning. The analysis will

focus on the planning processes related to the HUD SCI to explore the following research questions:

- 1) Did the SCI's unique federal guidance (and equity mandate) promote the integration of social equity in regional sustainability plans and planning processes?
 - a) How did the SCI regional planning grantees incorporate equity concerns into regional plans and planning processes?
 - b) Did equity planning become a clearer and more concrete concept, or did it remain a "fuzzy concept"?
 - c) How strong was the analysis of equity issues in regions?
 - d) Did regional equity goals translate into actionable policy recommendations?
 - e) How persuasive and communicative were equity planning components of regional sustainability plans? How was implicit communication and "framing" incorporated into equity components of the plan?
- 2) Was the HUD- mandated Fair Housing Equity Assessment (FHEA) effective in advancing equity in the SCI planning process?
 - a) What benefits or challenges emerged from the use the new FHEA assessment tool?
 - b) Did the outcomes of the FHEA translate (or "bridge") to the outcomes of the final regional plans?
 - c) Is the FHEA an effective tool for advancing the Affirmatively Furthering Fair Housing mandate of HUD?

- d) What are the implications for the revised AFFH rule from the experience of implementing the FHEA?

3.1. Methodological Approach

The study is a non-experimental design, using a mixed- methods approach to answer the research questions posed above. Several sources of data (described in section 3.3) were collected for the analysis. All data for this research was qualitative. Validity is a primary concern when conducting qualitative research. Considerations of qualitative research validity include credibility, transferability, dependability, confirmability and authenticity (Lincoln & Guba, 1985; Lincoln & Guba, 1986). The following provides a basic introduction to each criterion and discusses its relevance to the methods proposed for this research study.

Credibility refers to the accuracy of research findings-- do they reflect the “truth” as experienced by participants in the process being reviewed? Many strategies are recommended to address credibility concerns in qualitative research (Lincoln & Yuba, 1985). For my research design, I incorporated several of these strategies, including prolonged engagement, persistent observation, triangulation and member checking.

Prolonged engagement and persistent observation are related to the time spent either in the field understanding the context of setting, or the pertinent contextual factors influencing the setting being researched. I have four years of field experience observing and engaging stakeholders in the Sustainable Communities Initiative context as a U.S. Department of

Housing and Urban Development capacity- builder for the program. The extensive field exposure and experience meets the criteria for prolonged engagement and persistent observation. A limitation is that extensive and ongoing engagement with all 74 grantees was not possible. Therefore, my prolonged engagement and observations were more focused on grantees that I was providing technical assistance to. During my four years of technical assistance, I provided prolonged direct assistance to fifteen regional grantees.

Triangulation refers to the use of multiple data sources to develop a rich, robust and comprehensive set of data for the issue or context being analyzed. My research design utilizes “methods triangulation” (Denzin, 1978). Methods triangulation was achieved by using multiple data sources, surveys, interviews, and content analysis or plan review.

Member checking entails external review of research findings by stakeholders contributing to data collection content. Member checking in the context of the Sustainable Communities Initiative relates directly to review by grantees and other knowledgeable stakeholders in the program who have contributed to the qualitative data collected. Member checking considerations in my research design included external review by other capacity builders for the program. “Capacity builders” refers to professionals serving as technical assistance providers for the SCI. Member checking for this research involved two Kirwan Institute staff (not including myself) at The Ohio State University who assisted in SCI capacity- building and technical assistance activities.

Another credibility- based concern with any type of qualitative, content- based analysis is “scope and data collection” (Roller & Lavrakas, 2015). Scope and data collection reflect concerns related to the representation of the materials analyzed. Concerns regarding scope and data collection should seek to ensure materials reviewed are reflective of the larger set of stakeholders or target population. To address this concern, my content analysis (and evaluation of plan content) ensured a 100% representation of grantees (45) in 2010 cohort of grantees.

Adhering to the methodological procedures for coding is also critical to ensuring credibility in plan review. Code procedures and reliability have been a topic of methodological critique and development in recent years. Coding protocols should seek to utilize standard protocols utilized from other evaluation studies (Stevens et. al., 2014). In 2014, Lyle and Stevens presented a comprehensive seven step list of best practices for plan evaluators to adopt. These include the following steps (adapted to paraphrase from Lyle & Stevens, 2014):

- Replicate existing items with relevant protocols, and items have been developed and tested in other studies.
- Describe scoring scheme, application and when aggregating items, specifically address weighting.
- Clarify who coded plans and their level of expertise/training.

- Employ pre-testing protocols and procedures, and document pre-test reliability data.
- Identify the how plans are obtained, the geography of where plans were created, and if sampling of plans occurred.
- Assess the reliability of all coding items using Krippendorff's Alpha (Krippendorff, 2004). Krippendorff's Alpha is a statistical measure of coding agreement for content analysis utilizing multiple coders.

Plan evaluation methods utilized for this research adhered to Lyle and Stevens (2014) strategies, except when study limitations did not allow. The primary limitation at this time was not including the integration of a secondary coder for plan evaluation. Integration of a secondary coder and inter-coder reliability will be calculated for future expansion of this research.

Transferability concerns relate to the ability for the research to be generalized and applied to other contexts. Transferability is strengthened by the depth of context provided by the researcher in describing the factors influencing the setting. An approach to address transferability is "thick description," which is a process for providing an extensive and in-depth contextual description of the macro and cultural factors impacting the research setting (Holloway, 1997). In the context of the Sustainable Communities Initiative, a "thick description" was developed and presented in Chapter 1 of the dissertation. The SCI "thick

description” discusses the context of the program, the external factors and challenges facing the program, and the organizational and social context of grantees.

Dependability addresses concerns of replicability-- are the research methods consistent and could they be replicated? A primary mechanism in ensuring dependability is extensive and detailed description and documentation of all processes in the research approach. A detailed and extensive description of processes in the research approach is provided later in this chapter. Confirmability regards the ability for findings to be confirmed or corroborated by external researchers. For example, would external researchers produce the same findings with consistency when analyzing the same data? An external “inquiry audit” and “confirmation audit” can be utilized to ensure dependability and confirmability. The research approach utilized an external inquiry audit to review the process (inquiry) and findings (confirmation) of the research. Confirmability for this research included external review by other Sustainable Communities Initiative program capacity builders.

Authenticity, as defined by Lincoln and Guba and other scholars, pertains to the “trustworthiness” of the research (Lincoln & Guba, 1986). Does it respect the views and perspectives of participants? Does it seek to not disparately empower or disempower one group of participants vs. another? Are differing perspectives, realities and value systems presented fairly? Authenticity can also be viewed as a form of research ethics and the ability to have nonjudgmental empathy for the lived experiences of research participants (Milne, 2005). To account for authenticity in research design, I met the three aspects of

authenticity established by Lincoln and Guba: fairness, in which researchers present perspectives, differing value systems and conflicts fairly; ontological authenticity, in which research seeks to better inform the consciousness or capacity of stakeholders involved in the research; and finally catalytic authenticity, in which some form of action is initiated by the research process and outcomes (Lincoln & Guba, 1986).

3.2. Statement of Researcher Status

All researchers strive for objectivity in their analysis, but have a responsibility to document relevant experiences that could influence implicit biases and perceptions. As a researcher, I have “insider status” in regards to the HUD SCI. I acted as an official capacity builder on behalf of the agency, with funding support from HUD and philanthropic entities, including the W.K. Kellogg Foundation, Open Society Foundation and Ford Foundation. These relationships had no direct impact on my research outcomes, but are reported to provide additional context.

As a capacity builder for the program, I worked with SCI grantees across the nation in assisting with equity planning activities in the program. Additionally, I assisted HUD in reviewing grantee materials, and developing and presenting best practices in equity planning. Finally, I acted as a primary capacity builder for the Fair Housing Equity Assessment, in partnership with PolicyLink and Minnesota Housing Partnership. As a program “insider” I was able to access substantial experiential and outcome- related data from both grantees and HUD. I am currently acting in collaboration with other SCI

researchers informally convened by HUD. The SCI program has no evaluation funding and a small group of researchers are contributing their expertise and research to understand the outcomes and implications of the SCI.

3.3. Data Sources

Six sources of data were utilized and triangulated to analyze the SCI experience and outcomes. These data sources are listed and described in further detail in Figure 3.

Figure 3: Sources of data.

| Data Source | Description |
|--|--|
| 1: Participant Observation | Observational data from four years of participation in Sustainable Communities Initiative activities. Participant observation including participation in the following activities: grantee webinars, grantee “boot camps”, national SCI conferences, capacity builder and HUD meetings, and grantee capacity building activities. Participant observation activities was involved both 2010 and 2011 SCI grantees. |
| 2: Existing Evaluation Reports & Materials | Final evaluation reports reports on grantee performance from HUD. Evaluation materials were limited to only the 2010 cohort of SCI grantees. |
| 3: Grantee Final Narrative Reports | Final progress and outcome reports submitted by grantees to HUD. |
| 4: Regional Plans | Final regional plans produced by grantees, with data limited to 2010 SCI grantees |
| 5: Fair Housing Equity Assessments | Final Fair Housing Equity Assessments produced by grantees, with data limited to 2010 SCI grantees. |
| 6: Grantee Interviews | Interviews of rural grantees pertaining to the Fair Housing Equity Assessment process, with data limited to 2010 SCI grantees. |

3.4. Sample

Data sources were refined to the first cohort of grantees (awarded in 2010) when possible. The research focused on 2010 grantees because of the potential constraints in analyzing a program that was only recently implemented. The first cohort of grantees was most impacted by initial program design challenges, and all 2010 grantees had completed

their plans upon finalizing the analysis for this research. The second cohort of 2011 grantees also provides a wealth of data and insights for future research. My future research activities will integrate the outcomes of the second cohort of grantees. Figure 4 provides a detailed list of the forty-five 2010 grantees (the first cohort), and a map of these grantees is provided in Figure 5.

Figure 4: 2010 SCI Grantees and Grantee Information

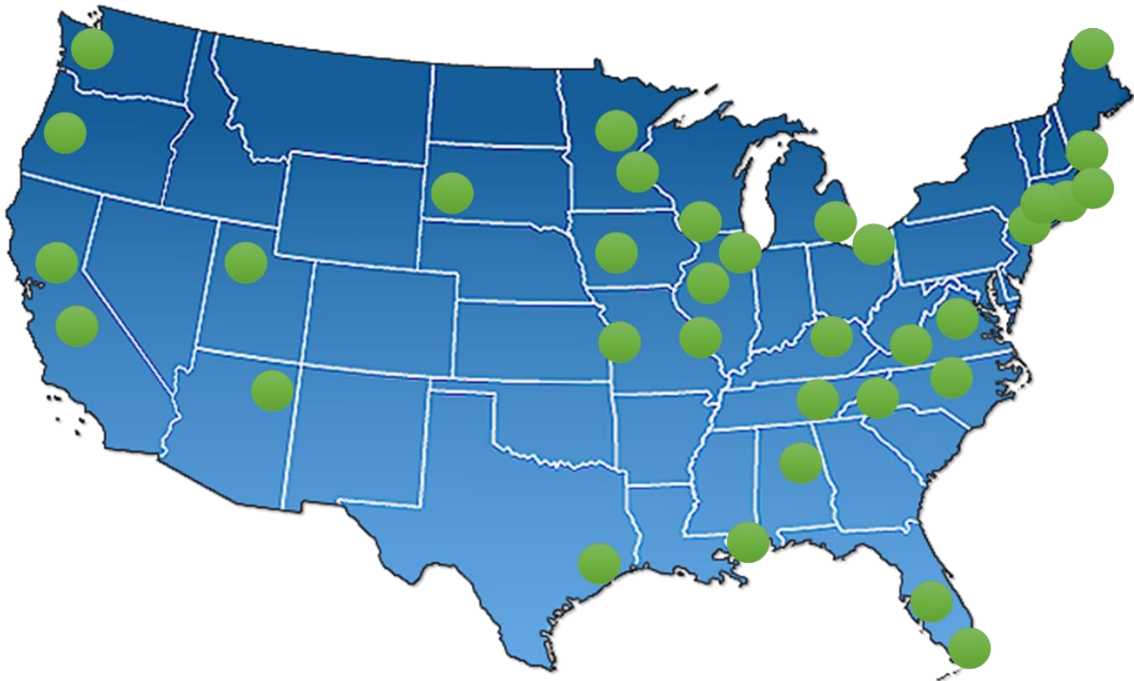
| Grantee | Population | Award Total |
|---|------------|----------------|
| Apache County | 182,398 | \$820,500.00 |
| Berkshire Regional Planning Commission | 129,288 | \$590,700.00 |
| California State University, Fresno Foundation | 3,880,304 | \$4,000,000.00 |
| Capital Area Council of Governments | 1,705,075 | \$3,700,000.00 |
| Capital Area Regional Planning Commission | 426,528 | \$1,997,500.00 |
| Capitol Region Council of Governments | 1,329,799 | \$4,200,000.00 |
| Central Florida Regional Planning Council | 253,827 | \$1,400,000.00 |
| Chicago Metropolitan Agency for Planning | 8,150,789 | \$4,250,000.00 |
| Chittenden County Regional Planning Commission | 208,055 | \$995,000.00 |
| City of Knoxville, Tennessee | 699,247 | \$4,327,500.00 |
| Des Moines Area Metropolitan Planning Organization | 394,964 | \$2,200,000.00 |
| East Alabama Regional Planning and Development Commission | 458,597 | \$225,000.00 |
| East-West Gateway Council of Governments | 2,482,935 | \$4,687,750.00 |
| Evansville Metropolitan Planning Organization | 269,608 | \$1,420,300.00 |
| Franklin Regional Council of Governments | 71,537 | \$425,000.00 |
| Greater Portland Council of Governments | 409,169 | \$1,600,000.00 |
| Gulf Regional Planning Commission | 394,375 | \$2,000,000.00 |
| Houston-Galveston Area Council | 4,877,992 | \$3,750,000.00 |
| Land-of-Sky Regional Council | 412,672 | \$1,600,000.00 |

Continued

Figure 4 continued

| | | |
|---|------------|----------------|
| Lane Council of Governments | 227,499 | \$1,450,000.00 |
| Metropolitan Area Planning Council | 3,066,321 | \$4,000,000.00 |
| Metropolitan Council (MN) | 2,642,056 | \$5,000,000.00 |
| Mid-America Regional Council (RPG) | 1,672,416 | \$4,250,000.00 |
| New River Valley Planning District Commission | 159,587 | \$1,000,000.00 |
| Northeast Ohio Areawide Coordinating Agency | 3,918,159 | \$4,250,000.00 |
| Northern Maine Development Commission | 107,879 | \$800,000.00 |
| Northwoods NiiJii Enterprise Community, Inc. | 6,612 | \$525,000.00 |
| Piedmont Authority for Regional Transportation | 1,581,122 | \$1,600,000.00 |
| Puget Sound Regional Council | 3,768,244 | \$4,999,700.00 |
| Region Five Development Commission | 161,108 | \$825,050.00 |
| Regional Plan Association, Inc. | 13,276,104 | \$3,500,000.00 |
| Roanoke Valley Alleghany Regional Commission | 300,399 | \$625,000.00 |
| Rockford Metropolitan Agency for Planning | 353,722 | \$600,000.00 |
| Sacramento Area Council of Governments | 2,292,894 | \$1,500,000.00 |
| Salt Lake County | 1,695,493 | \$5,000,000.00 |
| South Florida Regional Planning Council | 4,340,266 | \$4,250,000.00 |
| Southeast Michigan Council of Governments | 4,833,493 | \$2,850,000.00 |
| Southern Bancorp Capital Partners | 26,936 | \$710,900.00 |
| Southwestern Wisconsin Regional Planning Commission | 101,212 | \$475,000.00 |
| Thomas Jefferson Planning District Commission | 196,766 | \$999,000.00 |
| Thunder Valley Community Development Corporation | 18,970 | \$996,100.00 |
| Thurston Regional Planning Council (RPG) | 250,979 | \$1,500,000.00 |
| Tri-County Regional Planning Commission (IL) | 375,865 | \$1,200,000.00 |
| University of Kentucky Research Foundation | 84,920 | \$680,000.00 |
| Windham Region Council of Governments | 117,518 | \$225,000.00 |

Figure 5: Location of the 2010 Sustainable Communities Initiative Regional Planning Grantees



3.5. Sample Characteristics

The 2010 cohort of regional planning grantees included forty-five grantees distributed in twenty-eight states across the United States. In total, the forty-five 2010 grantees included a geographic area with a population of over 72 million people, with regional planning grant awards that totaled \$98 million. These grantee jurisdictions ranged from very large metropolitan areas to tribal areas and small rural regions. According to HUD’s categorization of grantee cohort size, eighteen grantees were large regions (with more than 500,000 residents), fourteen were medium- size regions (approximately 200,000 to

500,000 people), and thirteen were small regions (approximately 200,000 people and fewer). Grantees ranged in size of population from 6,000 (Northwoods NiiJii Enterprise Community, Inc.) to more than 13 million (Regional Plan Association, NY Metropolitan Area).

3.6. Data Collection

Data collection methods occurred over a four-year time span. Detailed descriptions of data collection activities and approach are provided for each source of data below.

Participant Observation: Participant observation activities included all activities pertaining to my role as a capacity builder for the SCI initiative between 2011 and 2015. Participant observation included the following activities: grantee webinars, grantee “boot camps,” the annual national SCI conference, capacity builder and HUD meetings, and direct one-on-one grantee capacity-building activities. Capacity-building activities were conducted in coordination with HUD, PolicyLink and the Minnesota Housing Partnership. My participation activities included more than 1,200 hours of direct engagement with the SCI program as a capacity builder over a four-year time span. Participant observation activities provided background context to assist in the design of this research.

Existing Evaluation Reports and Materials: All final agency and capacity builder documents were gathered directly from a HUD database of SCI program materials.

Grantee Final Reports, Regional Plans and Fair Housing Equity Assessments: All final grantee documents were gathered directly from a HUD database of grantee- produced materials.

Grantee Interviews: In 2015, working on behalf of the Kirwan Institute and with collaborators at the Minnesota Housing Partnership, I conducted an early evaluation assessment of the Fair Housing Equity Assessment process for rural grantees. Evaluation activities included interviews with smaller and rural grantee regions from the 2010 and 2011 cohorts of grantees. Grantee interviews were conducted by Minnesota Housing Partnership and me through the Kirwan Institute for twenty regional grantees. These grantees are identified below:

- Smart Valley Places CA
- Heartland 2060 FL
- The Tomorrow Plan: Partnering for a Greener Greater Des Moines IA
- Brilliant. Bright. Community Project. IL
- Regional Plan for Sustainable Development IN
- Flint Hills Frontiers KS
- Sustainable Berkshires: Community Strategies for a Sustainable Future MA
- Sustainable Franklin County: Regional Plan for Sustainable Development MA
- Grand Vision to Grand Action: Regional Plan for Sustainable Development MI
- Mid-Michigan Program for Greater Sustainability MI

- The Central Minnesota Sustainable Development Plan MN
- Plan for Opportunity: Miss. Gulf Coast Sustainable Communities Initiative MS
- Vibrant Futures: Regional Planning for Local Prosperity MT
- FOCUS: Lower Cape Fear Regional Plan for Sustainable Development NC
- Vision West North Dakota ND
- Viva Dona Ana: Building A Sustainable Future NM
- New River Valley Livability Initiative VA
- East Central Vermont: What We Want VT
- Sustainable Thurston WA
- Capital Region Sustainable Communities WI

The qualitative interview data generated from this process was made available and utilized for the Fair Housing and Equity Assessment component of this research. Grantee interview outcomes are synthesized in the case study of rural FHEA implementation included in section 4.1.3.

3.7. Analytical Approach

The analytical approach to each data source varied due to the unique nature of the various types of data collected for this research. Thematic analysis was utilized to analyze participant observation data, interviews and HUD/grantee narrative reports. This supplemental data provide context for the analysis in Chapter 4 and discussion in Chapter 5. Thematic analysis involved standard methodological techniques of coding qualitative

data and developing themes through six phases of analysis. The six phases of thematic analysis include: familiarization with data, development of codes, theme identification with codes, review of themes, definition of themes, and thematic report production.

Plan evaluation methods were utilized to analyze Grantee Final Reports, Grantee Final Regional Plans and Grantee Fair Housing Equity Assessments. The evaluation of final plans and final progress reports documents included a review of analysis, policies and recommendations identified in sustainability plans. Evaluation also looked at the “framing” and language used to engage equity issues in the plan. Overarching evaluation criteria were informed by the criteria identified by Berke and Godschalk. These general criteria include the items identified in Figure 6.

Detailed coding criteria are modeled after protocols from the American Planning Association’s “Comprehensive Plan Standards for Sustaining Places” (American Planning Association, 2015). These detailed criteria were directly adapted from the APA’s criteria and include criteria from the categories of: Interwoven Equity, Authentic Engagement, Responsible Regionalism, Accountable Implementation, and Coordinated Characteristics. These criteria were narrowed from the broader set of plan criteria in the APA’s “Sustaining Places” plan evaluation criteria. Criteria that were selected were the most consistent with social equity goals in the planning process and the regional nature of the plans. Additional criteria were developed to gauge compliance with the HUD Fair Housing Equity

Assessment, the U.S. Fair Housing Act, and language or framing. The detailed evaluation criteria for the plan evaluation are provided in Figures 7 to 11.

Figure 6: General plan evaluation criteria.

| | |
|-------------------|--|
| Internal Criteria | <p>Issue Identification & Vision: Description of community needs, assets, trends and future visions related to equity concerns</p> <p>Goals: Reflection of public values that express equity goals of the SCI program.</p> <p>Fact Base: Analysis of current and future conditions related to equity issues.</p> <p>Policies: Principles to guide public and private actions or policy to address equity issues.</p> <p>Implementation: Commitment to carry out policy actions related to equity policies.</p> <p>Internal Consistency: Mutually reinforcing visions, goals & policies for equity, environment and economic goals.</p> <p>Persuasiveness: Ability to persuasively communicate and justify why planning equity goals and outcomes are necessary.</p> |
| External Criteria | <p>Compliance: Consistency with purpose of planning mandates in the Fair Housing Equity Assessment, Title VI of the Civil Rights Act (disparate impact) and the Fair Housing Act.</p> |

Figure 7: Detailed plan evaluation criteria - Issue Identification, Vision, Goals, Fact Base, and Policies

| Source: | Principle/Practice: | Concept Definition: |
|---------------------------|--|--|
| SCI Livability Principles | 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. |

Continued

Figure 7 continued

| | | |
|--|---|---|
| <p>SCI Livability Principles</p> | <p>Support existing communities.</p> | <p>Target federal funding toward existing communities—through such strategies as transit-oriented, mixed-use development and land recycling—to increase community revitalization, improve the efficiency of public works investments, and safeguard rural landscapes.</p> |
| <p>American Planning Association Sustainability Criteria (Interwoven Equity)</p> | <p>Provide a range of housing types</p> | <p>A range of housing types is characterized by the presence of residential units of different sizes, configurations, tenures, and price points located in buildings of different sizes, configurations, ages, and ownership structures. Providing a range of housing types accommodates varying lifestyle choices and affordability needs and makes it possible for households of different sizes and income levels to live in close proximity to one another.</p> |
| <p>American Planning Association Sustainability Criteria (Interwoven Equity)</p> | <p>Plan for jobs/housing balance</p> | <p>A jobs/housing balance is characterized by a roughly equal number of jobs and housing units (households) within a commuter shed. A strong jobs/housing balance can also result in jobs that are better matched to the labor force living in the commuter shed, resulting in lower vehicle miles traveled, improved worker productivity, and higher overall quality of life. When coordinated with multimodal transportation investments, it improves access to employment opportunities for disadvantaged populations.</p> |
| <p>American Planning Association Sustainability Criteria (Interwoven Equity)</p> | <p>Plan for the physical, environmental, and economic improvement of at-risk, distressed, and disadvantaged neighborhoods</p> | <p>At-risk neighborhoods are experiencing falling property values, high real estate foreclosure rates, rapid depopulation, or physical deterioration. Distressed neighborhoods suffer from disinvestment and physical deterioration for many reasons, including (but not limited to) the existence of cheap land on the urban fringe, the financial burdens of maintaining an aging building stock, economic restructuring, land speculation, and the dissolution or relocation of anchor institutions. A disadvantaged neighborhood is a neighborhood in which residents have reduced access to resources and capital due to factors such as high levels of poverty and unemployment and low levels of educational attainment.</p> |

Continued

Figure 7 continued

| | | |
|--|---|---|
| <p>American Planning Association Sustainability Criteria (Interwoven Equity)</p> | <p>Plan for improved health and safety for at-risk populations</p> | <p>An at-risk population is characterized by vulnerability to health or safety impacts through factors such as race or ethnicity, socioeconomic status, geography, gender, age, behavior, or disability status. These populations may have additional needs before, during, and after a destabilizing event such as a natural or human-made disaster or period of extreme weather, or throughout an indefinite period of localized instability related to an economic downturn or a period of social turmoil. At-risk populations include children, the elderly, persons with disabilities, those living in institutionalized settings, those with limited English proficiency, and those who are transportation disadvantaged.</p> |
| <p>American Planning Association Sustainability Criteria (Interwoven Equity)</p> | <p>Provide accessible and quality public services, facilities, and health care to minority and low-income neighborhoods</p> | <p>A public service is a service performed for the benefit of the people who live in (and sometimes those who visit) the jurisdiction. A public facility is any building or property—such as a library, park, or community center—owned, leased, or funded by a public entity. Public services, facilities, and health care should be located so that all members of the public have safe and convenient transportation options to reach quality services and facilities that meet or exceed industry standards for service provision. Minority and low-income neighborhoods are often underserved by public services and facilities and healthcare providers.</p> |
| <p>American Planning Association Sustainability Criteria (Interwoven Equity)</p> | <p>Upgrade infrastructure and facilities in older and substandard areas</p> | <p>Infrastructure comprises the physical systems that allow societies and economies to function. These include water mains, storm and sanitary sewers, electrical grids, telecommunications facilities, and transportation facilities such as bridges, tunnels, and roadways. Upgrading is the process of improving these infrastructure and facilities through the addition or replacement of existing components with newer versions. An older area is a neighborhood, corridor, or district that has been developed and continuously occupied for multiple decades. A substandard area is a neighborhood, district, or corridor with infrastructure that fails to meet established standards.</p> |

Continued

Figure 7 continued

| | | |
|---|--|---|
| <p>American Planning Association Sustainability Criteria (Interwoven Equity)</p> | <p>Plan for workforce diversity and development</p> | <p>Workforce diversity is characterized by the employment of a wide variety of people in terms of age, cultural background, physical ability, race and ethnicity, religion, and gender identity. Workforce development is an economic development strategy that focuses on people rather than businesses; it attempts to enhance a region's economic stability and prosperity by developing jobs that match existing skills within the local workforce or training workers to meet the labor needs of local industries.</p> |
| <p>American Planning Association Sustainability Criteria (Interwoven Equity)</p> | <p>Protect vulnerable populations from natural hazards</p> | <p>A natural hazard is a natural event that threatens lives, property, and other assets. Natural hazards include floods, high wind events, landslides, earthquakes, and wildfires. Vulnerable neighborhoods face higher risks than others when disaster events occur. A population may be vulnerable for a variety of reasons, including location, socioeconomic status or access to resources, lack of leadership and organization, and lack of planning.</p> |
| <p>American Planning Association Sustainability Criteria (Authentic Engagement)</p> | <p>Engage stakeholders at all stages of the planning process</p> | <p>Engaging stakeholders throughout the planning process—from creating a community vision to defining goals, principles, objectives, and action steps, as well as in implementation and evaluation—is important to ensure that the plan accurately reflects community values and addresses community priority and needs. In addition, engagement builds public understanding and ownership of the adopted plan, leading to more effective implementation.</p> |
| <p>American Planning Association Sustainability Criteria (Authentic Engagement)</p> | <p>Seek diverse participation in the plan development process</p> | <p>A robust comprehensive planning process engages a wide range of participants across generations, ethnic groups, and income ranges. Especially important is reaching out to groups that might not always have a voice in community governance, including representatives of disadvantaged and minority communities.</p> |
| <p>American Planning Association Sustainability Criteria (Authentic Engagement)</p> | <p>Promote leadership development in disadvantaged communities during the planning process</p> | <p>Leaders and respected members of disadvantaged communities can act as important contacts and liaisons for planners in order to engage and empower community members throughout the planning process. Participation in the process can encourage development of emerging leaders, especially from within communities that may not have participated in planning previously.</p> |

Continued

Figure 7 continued

| | | |
|--|---|---|
| <p>American Planning Association Sustainability Criteria (Authentic Engagement)</p> | <p>Provide ongoing and understandable information for all participants</p> | <p>Information available in multiple, easily accessible formats and languages are essential for communicating with all constituents, including non-English speakers. Such communication may involve translating professional terms into more common lay vocabulary.</p> |
| <p>American Planning Association Sustainability Criteria (Authentic Engagement)</p> | <p>Use a variety of communications channels to inform and involve the community</p> | <p>Communications channels that can be used throughout the planning process include traditional media, social media, and Internet-based platforms. Different constituencies may prefer to engage through different channels.</p> |
| <p>American Planning Association Sustainability Criteria (Responsible Regionalism)</p> | <p>Promote regional cooperation and sharing of resources</p> | <p>Regional cooperation and sharing of resources covers any situation where multiple jurisdictions coordinate the provision of public services and facilities. This includes instances where separate jurisdictions share equipment or facilities, where jurisdictions consolidate service or facility provision, and where jurisdictions share a tax base. The latter is a revenue-sharing arrangement whereby local jurisdictions share tax proceeds from new development for the purposes of alleviating economic disparities among constituent jurisdictions and/or financing region-serving infrastructure and facilities.</p> |
| <p>American Planning Association Sustainability Criteria (Responsible Regionalism)</p> | <p>Coordinate local and regional housing plan goals</p> | <p>A regional housing plan is any officially adopted plan assessing current housing conditions and describing or depicting desirable future housing conditions across a multijurisdictional area. If applicable, these plans include state-mandated regional “fair share” plans establishing target affordable housing unit allocations among constituent jurisdictions. Local communities should provide for affordable housing in a manner consistent with the needs and targets defined in regional housing plans.</p> |

Figure 8: Detailed plan evaluation criteria - Implementation (commitment to carry out policy actions related to equity)

| Source: | Principle/Practice: | Concept Definition: |
|--|---|---|
| American Planning Association Sustainability Criteria (Accountable Implementation) | Indicate specific actions for implementation | Accountable implementation begins with identification of recommended policy, regulatory, investment, and programmatic actions that indicate the responsible agency, the recommended timeframe, and possible sources of funding. These actions are often provided in a matrix or similar format in the implementation section of the comprehensive plan. |
| American Planning Association Sustainability Criteria (Accountable Implementation) | Connect plan implementation to the capital planning process | Capital improvement plans guide and prioritize investments in facilities and infrastructure. A comprehensive plan can be connected to the capital planning process by ensuring that comprehensive plan goals and recommended action strategies align with capital improvement plan priorities and programs. |
| American Planning Association Sustainability Criteria (Accountable Implementation) | Connect plan implementation to the annual budgeting process | Plan objectives linked to budget categories and the timeframe of the community's annual budgeting process facilitates decision-making by elected and appointed officials concerning desired planning outcomes. |
| American Planning Association Sustainability Criteria (Accountable Implementation) | Establish interagency and organizational cooperation | Coordinating the activities and schedules of internal departments and external agencies and organizations increases implementation effectiveness and can leverage resources. |

Continued

Figure 8 continued

| | | |
|---|---|--|
| <p>American Planning Association Sustainability Criteria (Accountable Implementation)</p> | <p>Identify funding sources for plan implementation</p> | <p>Coordinating public and private funding sources—including federal, state, and foundation grant programs—facilitates implementation of priority plan items. A comprehensive plan that has consistent, clearly presented goals, objectives, and action priorities, backed by demonstrated community support, puts the community in a strong position to secure external funding for implementation.</p> |
| <p>American Planning Association Sustainability Criteria (Accountable Implementation)</p> | <p>Establish indicators, benchmarks, and targets</p> | <p>Indicators allow quantitative measurement of achievement of social, environmental, and economic goals and objectives. Benchmarks are measurements of existing conditions against which progress towards plan goals can be measured. Targets are aspirational levels of achievement for a specific goal or objective often tied to a specific timeframe. Establishing these metrics allow for the monitoring of progress in plan implementation.</p> |
| <p>American Planning Association Sustainability Criteria (Accountable Implementation)</p> | <p>Regularly evaluate and report on implementation progress</p> | <p>A process for evaluating and reporting plan implementation status and progress to both the public and elected officials following adoption ensures accountability and keeps the community informed about plan implementation progress. Such evaluation is typically done on an annual basis.</p> |

Continued

Figure 8 continued

| | | |
|---|---|--|
| <p>American Planning Association Sustainability Criteria (Accountable Implementation)</p> | <p>Adjust the plan as necessary based on evaluation</p> | <p>A process for adjusting plan goals, strategies, and priorities over time as conditions change or targets are not met keeps the plan current and in line with present conditions. This process should be tied to evaluation of and reporting on implementation progress.</p> |
|---|---|--|

Figure 9: Detailed plan evaluation criteria - Internal Consistency (mutually- reinforcing visions, goals and policies for equity, environment and economic goals)

| Source: | Principle/Practice: | Concept Definition: |
|--|--|--|
| <p>American Planning Association Sustainability Criteria (Coordinated Characteristics)</p> | <p>Be comprehensive in the plan’s coverage</p> | <p>Comprehensive means covering a range of traditional planning topics (e.g., land use, transportation, housing, natural resources, economic development, community facilities, natural hazards), as well as topics that address contemporary planning needs (e.g., public health, climate change, social equity, local food, green infrastructure, energy). It is important to address the interrelationships among these various topics.</p> |
| <p>American Planning Association Sustainability Criteria (Coordinated Characteristics)</p> | <p>Be consistent across plan components</p> | <p>A consistent plan frames proposals as sets of mutually- reinforcing actions in a systems approach linking the plan with public programs and regulations.</p> |

Figure 10: Detailed plan evaluation criteria – Persuasion (persuasively communicates and justifies why planning equity goals and outcomes are necessary)

| Source: | Principle/Practice: | Concept Definition: |
|---|---|--|
| American Planning Association Sustainability Criteria (Coordinated Characteristics) | Be persuasive in communicating the plan | A persuasive plan communicates key principles and ideas in a readable and attractive manner in order to inspire, inform, and engage readers. It uses up-to-date visual imagery to highlight and support its recommendations. |
| PolicyLink (SCI capacity builder) | Framing equity goals and objectives | Frames benefits of equity goals or objectives for the entire region. |

Figure 11: Detailed plan evaluation criteria – External Compliance (consistency with purpose of planning mandates in the Fair Housing Equity Assessment and the Fair Housing Act)

| Source: | Principle/Practice: | Concept Definition: |
|-----------------------|--------------------------|--|
| HUD FHEA Guidance | “Bridge” of FHEA | Fair Housing Equity Assessment recommendations integrated into the final Sustainability plan. |
| U.S. Fair Housing Act | Protected classes | Includes reference to classes protected in the U.S. Fair Housing Act (race, religion, national origin, gender, disability, families with children) |
| U.S. Fair Housing Act | Affirmatively furthering | References obligation of HUD and entitlement communities to “affirmatively further” fair housing goals. |

A zero to three scale was utilized for each evaluation criteria and this scale is provided in Figure 12. The scale was adapted from the American Planning Association *Comprehensive Plan Standards*. Language was evaluated to differentiate between the strength of plan recommendations and requirements. Words such as “consider, could, encourage, and should” were utilized to identify less stringent recommendations and words like “must, require, shall and will” were identified as more stringent requirements (Evans-Cowley and Gough, 2009).

Figure 12: Plan evaluation scoring matrix

| | | | | |
|-----------------------|-------------------|-----------------------|--------------------------|------------------------|
| Not Applicable N/A | Not Present +0 | Low Achievement +1 | Medium Achievement +2 | High Achievement +3 |
|-----------------------|-------------------|-----------------------|--------------------------|------------------------|

In addition to plan analysis, word and term searches were conducted with each plan to identify references to equity issues, tracking the number of substantive references to equity concerns in the plans. Reference searches were conducted to track the number of discussions pertaining to potentially marginalized populations (primarily focused on race, ethnicity and class). Reference searches of “poverty” and “equity” discussions in the plan, and references to multiple equity planning terms (fair housing, mixed- income, inclusive or inclusionary, and FHEA), were also conducted. Plans were coded by number of substantive references (e.g. use of the term in plan discussion, analysis, definitions or recommendations). To avoid double counting references, references were not counted if

the same term was used twice in the same discussion. Grantees with more than ten references to a particular term were all coded as “10 or more.”

3.8. Research Limitations

No methodology is perfect and all research design has limitations, including the research design for this analysis. It should be noted that this research is evaluating a program which was recently completed, with the earliest planning processes completed in 2014, followed by a second round of grantees completing their planning efforts in 2015. The 2010 cohort of grantees were the focus of this research because most completed their plans in 2014 or early 2015. The 2011 cohort of grantees would provide additional data to better understand SCI, but given the relatively recent completion date of their planning efforts, evaluation of their plans could not be integrated at this time. Future plan evaluations and outcome data collection will be needed to fully understand the outcomes of the SCI planning process.

Additionally, the inconsistency between planning processes and final planning products (in this case final regional plans) among grantees makes plan evaluation challenging. Grantees produced a large number of planning documents in addition to the regional plan and the Fair Housing Equity assessment. These additional documents could not be fully evaluated using plan evaluation methods. For example, the Capital Region CT grantee included twelve additional planning documents (topical plans and sub areas plans) in addition to the regional comprehensive plan and FHEA. Further evidence of efforts

pertaining to equity planning could be in supporting documents, but are not incorporated into the final comprehensive plan. These supplementary documents were not fully evaluated and are not included in the plan evaluation results. Future case studies focused on all materials produced by particular regions could be used to address this shortcoming.

Chapter 4. Analysis and Results

The following chapter provides analysis of the various sources of data and methods described in Chapter 3. The analysis triangulated multiple sources of data, including emerging literature pertaining to the SCI program, grantee reported data, government reported data, grantee case study interviews pertaining to the FHEA, and planning documents produced by grantees.

4.1. SCI: Grantee Perspectives

4.1.1. Thematic Analysis of Grantee Reflection Reports

A thematic analysis of final grantee narrative reports provides another vantage point of grantee perspectives on the SCI experience. Final narrative grantee reports were reviewed for all grantees in the 2010 SCI regional planning grantee cohort. In these narrative reports, grantees were able to provide their perspectives on the process, plan, and outcomes. A thematic analysis of content, with an emphasis on equity issues identified by grantees, was conducted with narrative report content. As described in Chapter 3, thematic analysis involved standard methodological techniques of coding qualitative data and developing themes through six phases of analysis. The six phases of thematic analysis includes: familiarization with data, development of codes, theme identification with codes, review of themes, definition of themes, and thematic report production.

4.1.1.1. Overview of Narrative Reports:

Final narrative reports were a required submission for all grantees. Reports followed a generally consistent outline, focusing on activities accomplished, progress related to grant deliverables, and administrative processes. Additionally, HUD requested grantees reflect and respond to several questions in the final reports. These questions pertained to overall lessons learned through the SCI process, engagement experiences and implementation. The following questions provided by HUD field staff and were the most frequently answered by grantees in final narrative reports:

- What lessons were learned during the period of performance that will improve the implementation of the plan developed during your grant process? What assumptions about planning for sustainability are being confirmed and which are being challenged as you move forward? What evidence do you have that this plan will translate to concrete impact and actual implementation in the months and years to come?
- What evidence do you have that this plan will translate to concrete impact and actual implementation in the months and years to come? Has the quality of the implementation taken on a different character because of the approach that you have taken in the planning process (e.g., emphasis on engagement and equity, sustainability framework, etc.)?

- How did the federal partnership support or advance your planning effort? What opportunities were missed? What more could be done? How can federal agencies be helpful in implementation?
- What do you think it will take to succeed in effective implementation of your plan? If money, please be specific about the type of money that would be most helpful. If other resources, please describe how they could support your work.
- Please describe progress with outreach, engagement, and decision-making activities targeting populations traditionally marginalized in the planning process (include costs spent on these activities).
- What are the key milestones that should be tracked as your plan moves to implementation?

Grantees responded with some consistency in narrative reports, but reports varied substantially in respect to questions answered, length and the volume of detail in the response. Report lengths ranged from two pages to more than seventy pages, and the majority of reports were five to ten pages in length. The thematic analysis identified several major themes that were common in final grantee narratives submitted to HUD.

4.1.1.2. Theme: Regional relationship- building was a primary outcome of SCI planning

Many grantees identified the SCI process as the first planning effort to foster dialogue and relationship- building among regional stakeholders. Fresno State, the regional

grantee for the Central Valley of California, noted the SCI process has allowed for collaboration, which had never happened before at this scale. This was a common statement among grantees in their reports. As illustrated by the New York Regional Plan Association, the New York grantee, SCI was a “unique” and unprecedented process in their region:

“Three years of collaborative planning by the New York-Connecticut Sustainable Communities Consortium, a partnership of nine cities, two counties and six regional planning organizations, has resulted in an agenda to create more sustainable and equitable economic growth...This level of consensus on sustainability among a broad level of state, regional and local actors focused in various areas of planning in the two- state planning area is unprecedented.”

(Regional Plan Association, Narrative Report, 2014)

Grantees noted the strengthening of relationships and addition of new stakeholders to support planning efforts. As described by the Met Council in Minneapolis-St. Paul.:

“The new relationships that have been built are felt by almost all partners to be promising of ongoing collaborative work on important issues. The new relationships are across jurisdictions within the public sector; among leaders of different sectors; between community members and public agency staff; and between philanthropy and public officials. The Wilder Research final evaluation found that lead stakeholders of COO (Corridors of Opportunity) widely felt that leaders from one sector better understand the leaders from other sectors and are

more willing to listen. This in turn leads to more willingness to take risks in the pursuit of innovation.” (Metropolitan Council, Narrative Report, 2014)

4.1.1.3. Theme: The SCI process created a new emphasis and understanding for addressing social equity in regions

Most grantees identified the SCI process as building community capacity, depth of analysis, shared understanding and shared vision with regards to social equity. Only a minority of grantees reported no reflections on social equity, or no reference to social equity concerns in their final reports.

The Sacramento region identified the SCI process as an “inflection point to begin working with our members and low-income communities in new ways” (Sacramento, Narrative Report, 2014). Several grantees identified that the housing aspect of the SCI plan was the first time a regional vision and plan were created for housing. As described by the Sacramento, Puget Sound, Metropolitan Area (Boston) and Metropolitan Council (Twin Cities) regional grantees:

“The grant funding in particular allowed us to produce a first-ever report assessing the region’s housing market and programs, and federal and state policy shifts that could help facilitate a more regional approach to housing planning.” (Sacramento, Narrative Report, 2014)

“The project was able to elevate topics – such as social equity and equitable development – into a regional conversation that had not yet occurred.” (Puget Sound, Narrative Report, 2014)

“The Sustainable Communities grant...enabled a much more focused and deliberate emphasis on equity – both the issue content and planning approaches...the grant also brought diverse organizations together to learn from one another, and to expand the breadth and reach of equity-focused organizations. Creating a more equitable region was a major goal that underscored the entire body of work from Sustainable Communities.” (Metropolitan Area, Narrative Report, 2014)

“...the final evaluation found that COO has “teed up” a conversation that is critical to the region: one about the impacts of gentrification on neighborhoods and the quality of life. More than just raising the issue...it has developed several inter-related strands of work to mitigate the effects.” (Metropolitan Council, Narrative Report, 2014)

The Regional Plan Association (representing the NY, NY region) identified the FHEA process as the first to build cohesive vision among stakeholders in regards to regional fair housing. The process also was the first opportunity to build relationships between the community development and fair housing stakeholders in the region. This

engagement and the FHEA model enabled the development of a nuanced strategy addressing both in- place redevelopment needs and housing mobility:

“The resulting regional conversation on fair and affordable housing was the first in memory for most participants and established both concepts and relationships that will extend past the immediate FHEA outcomes. Expert knowledge and perspective from the advisory committee helped to develop and refine strategies around fair housing. The result was a set of well-documented recommendations that promote investment and revitalization of racially and ethnically concentrated areas of poverty, and strategies to improve mobility and access to areas of opportunity. The FHEA process and advisory committee elevated fair housing to the forefront of the Sustainable Communities Initiative as a critical issue and catalyzed the formation of new relationships between housing coalitions.”
(Regional Plan Association, Narrative Report, 2014)

The Berkshire grantee found the FHEA process built awareness regarding equity concerns that had not previously existed in the region:

“The FHEA analysis was eye-opening to those involved and has led to a clearer understanding across the region that different communities face very different housing challenges, and that housing efforts need to accommodate those differences.” (Berkshire, Narrative Report, 2014)

Several rural (and less diverse) grantees identified their initial frustrations with the FHEA model, which was primarily urban- oriented, yet were surprised to find that the FHEA process was still valuable for expanding their understanding of equity and housing needs in their communities. The southwestern Wisconsin grantee discussed the challenges and opportunity in utilizing the FHEA process in a rural community that was 97% White. Despite initial frustration, they found the model to be helpful as a flexible framework to identify significant housing affordability barriers in the region:

“One of the more challenging elements of the Grow Southwest Wisconsin planning process was our Fair Housing Equity Assessment (FHEA). This was to be somewhat expected, as it was a program developed by the Department of Housing and Urban Development that focused on racial disparities, and we are a region that is neither urban or racially diverse. Ultimately, however, this became one part of the project where we place particular pride...we were able to delve deeper into the housing- related disparities of our region and identify three potential contributing barriers to quality housing, namely poverty, age, and access to a vehicle.” (Southwest Wisconsin, Narrative Report, 2014)

Two Rivers, VT described the challenges and surprising opportunities produced by the FHEA process in their rural White community. While initially challenging, the process assisted in building understanding of equity issues pertaining to disabled households, and deepening the understanding of rural White poverty in Vermont:

“We, like others in rural areas, struggled to make the FHEA a useful tool. In certain respects, we struggled more than others, in that we have no racial or ethnic concentrations of poverty as defined by HUD. Segregation is essentially nonexistent (notwithstanding the reality that we are 99% White in this part of the state). But in truth, until we conducted this exercise, we did not know the answers to the questions posed by the FHEA process. So in the end, it was an excellent exercise and we learned about other issues beyond those specified.” (Two Rivers, Narrative Report, 2014)

Data was seen as a critical element for building conversations around social equity concerns. The value of data for building regional planning consensus was identified by the South Florida grantee:

“The importance of data. The availability of trusted, unbiased data that is communicated well has the ability to cut through the preconceptions that people and organizations have about existing conditions and future trends and productively impact policy discussions. People are oftentimes not fully aware or appreciative of the challenges and opportunities facing the region and its communities.” (South Florida, Narrative Report, 2014)

Multiple grantees noted the utility of the opportunity analysis as useful in building understanding around equity concerns. The Lane County, OR grantee utilized opportunity mapping to build analytical tools that could be shared with multiple regional stakeholders

(Lane County, Narrative Report, 2014). The Capital Area, WI grantee identified multiple direct outcomes from the opportunity assessment, with consortium members utilizing the analysis to frame and foster various equity- oriented activities and influencing policy decisions:

“Some outcomes (of the Geography of Opportunity report deliberation) include: United Way of Dane County using results to communicate with key funders the reasons for focusing on under-resourced neighborhoods, as demonstrated by FHEA; City of Madison incorporating FHEA analysis into Common Council resolution advancing their equity agenda; City of Madison using FHEA analysis to evaluate location recommendations for a new community center; Movin’ Out, a non-profit affordable housing developer using FHEA to include location efficiency criteria in their project selection process; and, planned for Fall 2014, using FHEA findings as a framework for a workshop at the YWCA’s Racial Justice Summit.”

(Capital Area, Narrative Report, 2014)

The Capital Area, WI grantee consortium also utilized the opportunity assessment to directly inform capacity-building and engagement efforts in the SCI planning process:

“(The consortium) Established and implemented Community Building Grant program that awarded six small grants, totaling \$75,000, to non-profit organizations in low-income communities of color identified in Geography of Opportunity. The grant program was designed by consulting with the Equity Work

Group to foster leadership and increase resident capacity to organize and advocate. Projects included place-making events, neighborhood gatherings, front-yard gardens, leadership trainings, formation of a community co-op, and asset-based community development. Proposed grant activities were successfully completed.” (Capital Area, Narrative Report, 2014)

South Florida reflected deeply on the community and leadership divide in regards to social equity in the planning process, more explicitly detailing the divergence in perspectives that make consensus difficult:

“The equity discussion is a difficult one. As a society, our ability to address issues of equity, fairness and justice is made more difficult due to the decline of social capital and shared community identity. The ability to support, empathize, sympathize and connect to others who we many not know or who are different from ourselves is a critical aspect of this discussion. Because “equity” is a politically and emotionally charged word that means different things to different people, the equity conversation fits the frame of the “wicked problem” that is unstructured, cross-cutting, and relentless. Some work within a frame of “givers” and “takers.” It will be difficult to get past that frame unless they are open-minded, intellectually curious, and willing to revisit their current impressions and beliefs. On the other hand, the equity “choir” needs to be equally open-minded and willing to listen and work with others who may not sync with their beliefs to move this discussion

forward. Data will continue to be very important as it provides a factual basis for discussion....It will be equally difficult for some to accept that treating everyone the same is not the same as treating everyone fairly.” (South Florida, Narrative Report, 2014)

Equity issues referenced were primarily identified in the context of housing affordability, fair housing or housing mobility, and concerns regarding implementation. Other grantees focused on references to traditional community development, blight elimination, health efforts, and food security projects. Small business development and minority contracting were also identified as topics of focus in equity planning. The inter-relationship between Transit Oriented Development (TOD) and gentrification was a focus for larger urban grantees.

Salt Lake County, UT focused intently on the relationship between zoning barriers and affordability or fair housing challenges:

“Zoning practices and development approvals have a greater impact than any other factor on fair housing choice. If the higher income cities in Davis County do not allow increased levels of affordable housing, particularly rental housing, protected classes will become more highly concentrated and segregated by 2020, thereby further limiting and impeding fair housing choice.” (Salt Lake County, Narrative Report, 2014)

These challenges not only impacted housing choice but effectively concentrated low-income students and students of color into poor performing schools, impacting regional educational outcomes:

“Lack of housing price diversity in several non-entitlement cities, due in part to zoning, has led to concentrations of low-income minority and ethnic groups in some neighborhoods in Clearfield. The concentration of poor minorities and ethnic groups can have detrimental impacts on the performance of schools and students. Without mitigating strategies by Clearfield and the school district, the educational and employment opportunities of minority, ethnic and immigrant children will suffer disproportionately.” (Salt Lake County, Narrative Report, 2014)

4.1.1.4. Theme: SCI created new competency and perspectives on the value of engagement, particularly with traditionally under-represented communities

A common theme represented in grantee reports was a new organizational appreciation of the benefits of robust engagement with under-represented communities. As described by the Central Florida and Franklin regional grantees.

“Lessons learned throughout this project included valuable input from traditionally marginalized members of the community. These residents are typically not involved in the planning, visioning, or decision-making processes of their local

governments. Involving them in the conversation provided crucial input which was incorporated into the plan.” (Central Florida, Narrative Report, 2014)

“The second key lesson is the importance of an inclusive planning process to ensure that a variety of perspectives are brought to the table to help create the RPSD. With the assistance of our Consortium members and Project Partners we had broad participation in the planning process including low- and moderate- income residents and youth. They brought new perspectives and ideas for projects, and helped to identify strategies to become more sustainable in a way that benefits residents of all income levels.” (Franklin, Narrative Report, 2014)

“Multiple grantees utilized leadership academies to build the civic capacity of under-represented communities and technical skill of regional stakeholders. MARC in Kansas City made a tremendous investment in community capacity-building and leadership development, with a three- year MARC Academy of Sustainable Communities, which hosted 153 events, including nearly 8,000 attendees.” (MARC, Narrative Report, 2014)

Equity networks were developed by several grantees. Although there were some challenges in figuring out how to best use these groups and their role in the planning process, many have persisted beyond the planning process. Again, MARC (the regional planning entity for Kansas City) was a leader in utilizing an equity summit and equity network model for strengthening engagement. Although the establishment of the equity

network was an unintended consequence of engagement activities undertaken by MARC, this network has stayed active beyond the grand process, focusing on several planning and community development issues. As described in MARC’s final narrative report:

“The most significant accomplishment under this activity, one that had not been anticipated, was the formation of the Equity Network, and coalition of organizations far beyond the initial equity partners, that has as its goal the development of action strategies in eight key areas to an equitable region: housing, health, transportation, education, training, land use, development, and environment.” (MARC, Narrative Report, 2014)

A similar equity network was utilized in other regions (Puget Sound, Boston, Knoxville). As documented by the Knoxville, TN grantee, their network remains active beyond the end of the planning process:

“A group has emerged out of our work specifically focused on equity and access to opportunity. This group has continued to meet and evolve to form a coalition that seeks to further the discussion around equity throughout the region.” (City of Knoxville, Narrative Report, 2014)

Grantees routinely noted the need to rethink traditional approaches to engagement. Quite simply, traditional public meetings are not very effective. Engagement needs to lean more heavily on “going to people,” providing resources to community members for

engagement, and engaging and analyzing community data in multi-faceted ways. As described by several grantees in their final reflections:

“Public workshops are just not as effective as they once were. We must go to where the people are and make it easy for them to engage. Online engagement tools and local/specific (meeting in a box) have proven to be effective tools to engage the general public.” (City of Knoxville, Narrative Report, 2014)

“We learned countless lessons during our period of performance. Not surprisingly, many of these relate to engaging a broader swath of the public. Going to where people already are gathered is one of the most effective ways to hear from the public. We also reaffirmed the importance of one-on-one and small group discussions. People want to share their ideas, but some are not comfortable with expressing them in large groups. While this was a bit more time-consuming, the final result is much stronger because of the time our team took to develop relationships and to genuinely listen.” (Des Moines, Narrative Report, 2014)

“We found that a diverse collection of outreach and involvement techniques were necessary to get meaningful feedback in a project of this scope. We created an innovative method for partnering with community organizations and individuals to assist us in gathering input, and we offered tangible resources (i.e. money) for their assistance. We hired a data analyst to ensure that the qualitative feedback we received was catalogued in a useful way and translated into input that we could

incorporate into the scenario planning and strategy development process. This helped us ensure we had someone on staff who could help manage all of the qualitative input, and who could develop creative and interesting ways to convey the input so that: (1) decision-makers connect with the input and use it to shape their decisions; and (2) individuals who gave of their time, energy, and sentiment to participate can see that their voices have been heard.” (Land of Sky, Narrative Report, 2014)

“Some of the innovative approaches and best practices included open houses, hybrid meeting designs, and meeting with groups at their standing meeting locations and times. We used music, food, and spoken word to bring people together...We used interpreters, translated documents, and provided childcare when needed.” (Metropolitan Area, Narrative Report, 2014)

The East West Gateway Council of Missouri noted a debate within their consortium between more technocratic views of engagement and more empowerment- oriented views of engagement. At the end of the SCI process, the agency identified the balance between more technical and empowerment- oriented engagement was essential for implementation efforts:

“While the technical team members wanted the public engagement session to serve as a data collection and distribution venue, the public engagement experts working on the project pointed out that members of the general public might not be as

engaged in sessions that were focused on highly technical data-driven information. EWG worked closely with both the technical and the public engagement experts to create a public engagement process that was data-driven and informative, but also that provided information that was easily understood and in a forum that allowed average citizens to freely express their ideas and opinions. This type of balanced approach must be carried forward into implementation.” (East West Gateway, Narrative Report, 2014)

Lane County, OR led a multi-faceted community participatory research process engaging Latino members of the community. The effort was to not only engage but also produce regional knowledge about how to best engage with the Latino community:

“The purpose of the Latino Participatory Research Project (Task 2.3), led by University of Oregon Professor Gerardo Sandoval in partnership with Sightline Institute, is to: 1) develop best practices and test outreach strategies to reach the Latino community; and 2) identify economic and social indicators of importance to the Latino community through outreach and participation with the Latino community. The project utilized a wide range of methods including individual interviews with Latino leaders and immigrants, small focus groups, and two interactive community planning workshops that engaged almost 100 people. Two local community-based organizations that serve the Latino Community, Huerto de

la Familia and Downtown Languages, helped organize and recruit participants for the community workshops.” (Lane County, Narrative Report, 2014)

The success of this work has changed the models for community engagement being utilized in the region. The grantee has followed up on this success to develop capacity-building tool kits from the engagement lessons learned through the experience.

Grantees acknowledged that these more robust engagement processes are more time, labor and resource intensive. To be effective, they also need to be integrated into processes at the beginning of planning efforts:

“Conducting meaningful outreach to under-represented populations is challenging. Sustainable planning processes need to consider these challenges at the outset, and develop a strategy for how to integrate these groups into the planning process in a substantive way.” (Salt Lake County, Narrative Report, 2014)

Smaller grantees who received fewer funds identified their struggles in devoting the resources needed to do effective engagement. These sentiments are reflected in the reflection of the Northern Maine grantee:

“We struggled (and continue to struggle) with engagement of under-represented communities in the primary discussions on the project work. We needed to have a much more refined outreach plan that would have included staff presence at food

banks, religious gatherings, retail stores, etc. and this would have been very expensive to accomplish given our geography.” (Northern Maine, Narrative Report, 2014)

The range of engagement and engagement specifically with marginalized communities among grantees was extreme, with some grantees considering a direct mailing of a meeting invitation to an under-represented group sufficient engagement (Portland, ME), while others engaged thousands directly and devoted substantial grant funds to leadership development, community organizing and capacity-building for community-based organizations. While many grantees acknowledged very substantive changes to their approach to community engagement, a minority of grantees primarily engaged with organizational stakeholders or clung to traditional engagement approaches. For example, Regional Plan Association and Northeast Ohio primarily described engagement through the lens of organizational stakeholder engagement, with limited community-based engagement activities.

4.1.1.5. Theme: SCI protest efforts from the Tea Party and Anti-Agenda 21 activists required a response from planning efforts

Several grantees acknowledged the activities of anti-sustainability groups and their efforts to disrupt the process. As described by the Des Moines grantee, staff was not even familiar with Agenda 21 prior to Tea Party protests:

“One of the most unexpected aspects of the process was the anti-Agenda 21 crowd. Going into the process, no one on our team was familiar with Agenda 21. At our first outreach event, though, it was mentioned, so we worked to quickly get up to speed on it. The anti-Agenda 21 proponents came out to each public event we hosted, and sometimes attempted to disrupt the entire event.” (Des Moines, Narrative Report, 2014)

Grantees noted the challenge of utilizing the language of “sustainability” in the context of fears and misinformation regarding Agenda 21 (for example, in Houston-Galveston). The Piedmont grantee described the language of sustainability as “toxic.” The Capital Region Regional Planning Commission described how sustainability was re-framed to be more palatable to the public, leaders and organizational stakeholders.

“Sustainability is a charged term for some. We were unprepared to deal with the public opposition and misinformation that we encountered at the beginning of the project. In the beginning of the grant period the opposition may have hampered effective public engagement.” (Houston-Galveston, Narrative Report, 2014)

“Prior to the regional planning effort beginning, there were local efforts underway that clearly fit under “planning for sustainability.” But they didn’t refer to themselves as sustainable or smart growth. Those words were deemed too toxic.” (Piedmont, Narrative Report, 2014)

“Another lesson learned relates to how we talk about sustainability. This concept, and how it relates to our bi-state action agenda, is still difficult for many people to grasp. This includes municipal officials and the general public. We made the decision to reframe the discussion of sustainability under the goals of building a connected, competitive, vibrant and green Knowledge Corridor region.” (Capital Region, Narrative Report, 2014)

Multiple grantees (Des Moines, East West Gateway, Piedmont) acknowledged the need to modify their approach to avoid disruption by tea party and anti-Agenda 21 activists. Community meeting and event structure modifications, communication, community input, and transparency were all effective strategies to counter anti-Agenda 21 and Tea Party protests:

“Consequently (in response to disruptions), we altered the format of our outreach events to prevent this from happening. We also worked to educate our elected officials and representatives from community organizations.” (Des Moines, Narrative Report, 2014)

“Despite the presence of Agenda 21er’s and Tea Party members, the project team avoided their influence...The project team employed three communication strategies. First, the point was consistently made clear that the resulting action items were not mandatory. They were solutions based in fact and research that could be used in each community. Second, the entire process was

transparent...Finally, while sound professional judgement shaped some of the plan, at the core everything was driven by the public input we received.” (Piedmont, Narrative Report, 2014)

4.1.1.6. Theme: Implementation activities were emerging but grantees expressed hope and frustration about keeping the momentum created by the SCI process

Multiple grantees have transitioned from planning into implementation of projects, including attracting or generating resources to fund implementation efforts. The Franklin regional grantee attributed implementation activities and new resources directly to the quality of the SCI plans:

“The significant number of follow-up projects that have occurred based on the recommendations of the RPSD, in some cases before it was even finalized, has been remarkable. The Plan’s combination of comprehensiveness and detail has been very helpful in securing funding for new projects and for advocating for others including enhanced food systems, improved passenger rail along the CT River Line, expansion of transit service, increased affordable housing, greater forest conservation, and many others.” (Franklin, Narrative Report, 2014)

The use of demonstration and pilot projects was a way to build community confidence in the planning process and ensure engagement was seen as authentic and valid.

For example, the Southern Bankcorp grantee focused on vacant property mitigation, playground and recreational space development for low-income youth, and storefront revitalization as demonstration projects. The grantee also focused on partnerships to address crime and promote safety. As described by the grantee, these partnerships were vital in building community trust and confidence in the process:

“A unique aspect of SBCP’s planning approach helped to address the skepticism that many residents hold about community-driven planning efforts. People are used to seeing strategic planning initiatives that stir residents to envision a better future, but result in plans that end up sitting on a shelf somewhere without any visible impact...Investing in several initial and highly visible projects is a vital component for ensuring ongoing community engagement in the planning effort.” (Southern Bankcorp, Narrative Report, 2014)

Re-granting SCI funds for multiple smaller planning demonstration projects across the region increased the likelihood of planning activities transitioning into implementation. MARC, the Kansas City grantee, dedicated \$1.5 million in HUD and U.S. DOT funds to supporting livable communities’ projects among local jurisdictions and other organizations. Grants funded multiple neighborhood plans across the region, including plans for affordable housing, which have already started implementation by then end of the planning process.

Relationship building, engagement of partners, and alignment of stakeholders were routinely identified as primary foundations for plan implementation:

“We have no evidence that implementation will translate to concrete impact. That will come in the months and years that follow this planning grant. But the level of engagement and alignment has been strong and the case studies we have looked at point to successful implementation if a strong foundation is in place.” (Rockford Regional, Narrative Report, 2014)

“Relationships are the foundation for all implementation efforts going forward. We are constantly reminded that one of the most important outcomes of the PlanET process has been the relationships that have been forged.” (City of Knoxville, Narrative Report, 2014)

“...we decided and discovered through the process that while tracking our progress through indicators is important, more important is establishing relationships between organizations so that we aware of each other’s efforts and can work together toward our common goals. Throughout the three years cross- sector relationships were established and will be long- lasting through establishing the ECOS Leadership Team beyond the life of this grant, partnering on implementation projects, shifting funding, and setting up work plans based on the 8 ECOS Strategies.” (Chittenden County, Narrative Report, 2014)

Grantees also noted that the pressure for implementation is increased as a by-product of the robust engagement from SCI. As described by the Des Moines grantee, post-plan interest and engagement continue due to effective engagement during the planning process:

“The outreach taken on for Mobilizing Tomorrow continues to be more robust because of the outreach taken on during the development of the plan. We now have strong relationships with the African American community, which have enabled us to reach populations we perhaps would not have in the past. At the same time, other groups that we perhaps did not expect to grab onto the plan so strongly also are seeking to implement it. This is a result of emphasizing engagement and truly writing a community plan.” (Des Moines, Narrative Report, 2014)

Grantees also identified frustrations, concerns and resource needs for continuing the momentum of the SCI process. Without resources, multiple grantees indicated that implementation will be challenging and the engagement built during the process will be undermined:

“The largest constraint to staying on target is the lack of resources to continue to host Consortium meetings and to continue to host the working groups meetings (both on a less frequent basis than during the planning process). Implementation tracking and monitoring requires the continued input of the wide range of existing

stakeholders, plus the identification, outreach, and involvement of constant new ones.” (Berkshire Regional, Narrative Report, 2014)

“The lack of funding for implementation is a missed opportunity. The work we have been doing at the regional level has not been without challenges, and it has been difficult to spur continued local government involvement without being able to come through on any promise of implementation funds.” (Land of Sky, Narrative Report, 2014)

“In particular, we are finding that securing an ongoing support for the Regional Equity Network will be a challenge. PSRC, as the MPO, has limitations on the types of activities that are eligible for support through the FHWA and FTA federal grants that fund the majority of our activities...If we cannot find ongoing funding, we are looking at a situation where the incredible support that we have built in the community through the activities that have been supported through the Sustainable Communities Initiative could be undermined if there is a perception that this was a “one-off” effort.” (Puget Sound, Narrative Report, 2014)

Grantees directly expressed frustration about federal policy support in the aftermath of the SCI process, especially. Particularly, since grantees reported expectations that future federal support would be provided for implementation of the SCI plans.

“Of equal concern is the federal HUD-DOT-EPA partnership, as our local implementation was dependent on resources from Washington. It does not appear that implementation dollars are going to be available to grantees any time soon. We are also concerned that the Rockford Housing Authority’s Choice Neighborhood grant was not among the announced awards in the most recent funding cycle. This is the type of assistance that we were depending on to drive transformative change.” (Rockford Regional, Narrative Report, 2014)

The need for a local “champion” to continue the SCI process moving forward for implementation was a commonly identified need among grantees. Concerns were also raised about the possibility of a local champion emerging without additional funds. As described by the Knoxville, TN grantee:

“Locally, we need to identify a champion, or set of champions, to continue moving this work forward. We no longer will have someone in a paid staff position who can shepherd the work forward. Ideally, grant funds could be made available to support staff in order to help keep the dialogue going and educate and inform the general public and other stakeholders in an effort to move towards implementation.” (City of Knoxville, Narrative Report, 2014)

4.1.2. Rural Fair Housing Equity Assessment Case Studies

Interview based case studies conducted by myself and the Minnesota Housing Partnership of rural SCI grantees identified both the challenges and opportunities with the FHEA model. Rural FHEA challenges included rural demographics and geography, lack of capacity or infrastructure and cost. The rural regions interviewed are described in Chapter 3.

The FHEA primarily utilized metrics for analysis most suitable for urban or larger metropolitan areas. Indices of segregation and concepts such as Racially Concentrated Areas of Poverty did not fit the typology, geography or demographics of rural regions. Rural poverty was far more dispersed and the traditional protected classes, which were the focus of the FHEA were often not demographically represented in rural regions. Additionally, the American Community Survey was less useful in rural areas, due to the larger margin of error found in small area geographic data for rural census tracts and block groups. Grantees supplemented HUD's data extensively to address these shortcomings, integrating locally generated data, such as data from administrative agencies and also qualitative data to their FHEA analysis.

Capacity and resource limitations were additional challenges for rural communities implementing the FHEA. Rural regions did not have the extensive nonprofit or community based organizational infrastructure found in urban regions. The limited engagement infrastructure required grantees to be creative in reaching underrepresented communities. Rural grantees generally received smaller SCI grants and therefore had more limited

resources to produce the FHEA. Rural grantees stated the FHEA process was time and labor intensive and grantees estimated costs ranged from \$50,000 to \$100,000 to produce the FHEA. Rural grantees relied heavily on capacity builders to counter capacity and resource challenges to complete the FHEA.

Despite the challenges, most rural grantees found the FHEA process beneficial to supporting equity concerns in their region. The majority of grantees interviewed indicated the FHEA did impact final planning outcomes and more importantly identified it as building regional knowledge and bringing attention to equity concerns. The FHEA also had led to some early implementation activities in rural grantee regions. Grantees noted the use of the FHEA to initiative pilot programs, influence policy change and support development of new funding to address housing and equity concerns in the region.

4.1.3. Thematic Analysis of HUD Evaluations

Several sources of documentation were consulted for this thematic analysis. The primary data reviewed were “Final GTR Performance Assessments,” the 2- to 5- page documents prepared for each grantee by HUD field staff, on the grantee’s performance and outcomes. Most of the assessments follow a very specific structure, beginning with basic administrative questions on performance, a rating of grantee performance (measures as good, fair or unsatisfactory), and a narrative report. Narrative reports focused on several issues, including administrative requirements and deadlines, engagement, equity, final deliverables, and implementation readiness. Field reports primarily produced for HUD

Region 5 (which primarily includes the Great Lakes states) were structured differently, largely written as a longer narrative, providing a much greater level of detail than the traditional reports. Thirty- six out of forty- five 2010 regional grantees had accessible evaluation reports. At this time, it is unclear if reports were prepared for the other nine grantees. Additional documents reviewed for this analysis included interim and final reports on SCI outcomes released by the HUD Office of Sustainable Housing and Communities (now named the Office of Economic Resiliency).

Summary of Grantee Performance

For the thirty-six evaluations reviewed for this analysis, no grantees were identified as “unsatisfactory” in performance. One grantee’s overall performance was not discernible from the evaluation (Northwoods NiiJii Enterprise Community, Inc), although the evaluation was primarily negative for this grantee. The remaining thirty- five grantees were rated “good” or “fair” for their overall performance. Thirty- one grantees were rated “good” in overall performance. It should be noted that narrative reports for these grantees were not exclusively positive, noting many challenges, even though overall performance was rated “good.” Four grantees were rated as “fair” in overall performance, including: East Alabama Regional Planning and Development Commission, Southeast Michigan Council of Governments, University of Kentucky Research Foundation, and Windham Region Council of Governments. Further discussion of grantees rated as “fair” is discussed below.

4.1.4. Evaluation Themes: Challenges with Grantees and Planning Processes

Capacity Challenges for Smaller Rural Grantees

A primary challenge, particular for smaller rural grantees, was lack of internal or local capacity to engage such a complicated, long-term planning process. The Northwoods NiJii and Southwest Wisconsin grantees exemplified this challenge, as described by HUD field staff:

“NNEC was a relatively low-capacity grantee given its small staff. Its executive director, however, is an experienced grant and project administrator but, for all intents and purposes, she runs a one-person operation. NNEC was an atypical regional grantee. Its work plan largely consists of a punch list of uncompleted projects identified in its 1999 strategic plan and it was not a good “fit” for the regional program. Because NNEC’s region is so small and discontinuous, it would have been a more appropriate candidate for a Challenge Grant rather than an SCI regional grant.” (HUD, Northwoods NiJii, 2014)

“SWWRPC was a low-capacity grantee. Its small and inexperienced staff was overwhelmed at times by its grant-related workload and, early on, did not receive the support it needed from SWWRPC’s leadership. SWWRPC was also at a serious disadvantage because it had sought in its grant application approximately twice the amount of funds it was ultimately awarded. It would have benefited greatly from the assistance of a good lead planning consultant but it could not afford to hire one.” (HUD, Southwest Wisconsin, 2014)

Political Challenges and Historical Legacies as a Barrier to Equity

Evaluations identified political challenges and the political influence of regional planning organization boards as a barrier to stronger equity performance in the planning process. These political pressures undermined consortium autonomy, fostered more conservative stances on equity concerns, and created barriers to challenging the status quo. Grantees that operated primarily “top down” planning processes also did not create opportunities for community voices to impact the planning process, particularly the voices of under-represented and marginalized communities. The historical legacy of discrimination in the regions also impacted equity outcomes. These concerns are described by HUD field staff:

“Although SEMCOG organized and convened a consortium in accordance with the grant requirements, it never operated as an independent entity and reported directly to SEMCOG’s Executive Committee that had ultimate decision-making authority.” (HUD, Southeast Michigan, 2014)

“That said, equity was not a major priority for this grantee. Their decision-making structure relied on a pre-existing agreement between the PDC, City, County, and University, with little room for community voices. They established a quarterly stakeholder meeting that was meant to fulfill this role, but that entity held little decision-making power.” (HUD, Thomas Jefferson Planning, 2014)

“We did not always find them to be receptive to suggestions about how to increase levels of inclusion. This may have been a product of the fact that everything had to be approved by their board of directors, a conservative body composed of elected officials.” (HUD, East West Gateway, 2014)

“This criticism, though, should be tempered by acknowledging that the Des Moines region, while growing more diverse, is historically overwhelmingly White and much of it is deeply uncomfortable with the idea of expanding access to opportunity for low-income families and people of color, which is manifested in the clearly-stated opposition to more greater access to affordable housing and public transportation. This meant that the grantee--like many others around the country--had to maintain a delicate balance between pursuing transformative change and maintaining the support of people who were not open to challenging the status quo when it comes to access to opportunity. This likely contributed to DMAMPO's cautious approach.” (HUD, Des Moines, 2014)

“Concurrent with this (plan) they sought to advance the conversation on social equity in a region with a storied history of discrimination and resistance to change.” (HUD, Gulf Coast, 2014)

Agenda 21 and Organized Resistance to SCI

HUD evaluations documented the significance of external challenges to the SCI process, particularly the impact of organized Tea Party protest and disruption of the planning process. Tea Party resistance emerged from fear that SCI was implementing the United Nations Agenda 21 framework. These concerns were more prominent in the Mid-Atlantic, Southeast and Western States, although they were documented to a lesser degree in other regions of the country as well:

“TJPDC was one of the first grantees to face criticism from local property rights activists who saw the project as an extension of UN Agenda 21.” (HUD, Thomas Jefferson Planning, 2014)

“Although a somewhat robust “Agenda 21” influenced group arose in opposition to NEOSCC’s efforts, which included an organized attempt to disrupt proceeding at one or two of the scenario planning sessions...” (HUD, Northeast Ohio, 2014)

Some grantees were able to counter the Tea Party resistance through modified engagement strategies, intended to diffuse larger group engagements. Tea Party and anti-Agenda 21 protests often attempted to disrupt the planning process through vocal disruption of public engagements. Thomas Jefferson Planning District and New River Valley were notable in productively modifying strategies to engage Tea Party resistance to the process:

“The PDC responded (to Agenda 21 concerns) by structuring their community meetings in an open house style rather than town hall style and having many one-on-one conversations with local activists.” (HUD, Thomas Jefferson Planning, 2014)

“New River Valley faced early opposition from project detractors raising property rights and other concerns. The grantee responded highly effectively, taking advantage of available capacity-building assistance and re-orienting their public engagement process to ensure an open and transparent process that did not allow any single voice to dominate.” (HUD, New River Valley, 2014)

Fair Housing Equity Assessment Resistance and Challenges

The 2010 grantees were informed of the Fair Housing Equity Assessment (FHEA) requirement in the first year of planning activities. Many grantees expressed frustration at this new obligation, with some grantees continually resisting the FHEA throughout the process. These grantees who did not “buy in” to the FHEA process or reluctantly produced an FHEA were documented as also struggling in connecting the FHEA to the plan. Illustrating these challenge are the evaluation of the East Alabama Regional Planning and Development Commission, Windham Region Council of Governments, and the University of Kentucky as described by HUD field staff:

“The grantee resisted initially, but then did complete a fair housing and equity assessment, as required by their cooperative agreement....It is unclear the degree to which these conversation shaped the recommendations in the FHEA, which are linked to the recommendations in the CLEAR plan and the implementation plan. What remained unclear is how serious the livability resource teams and municipalities in the region are about implementing these recommendations.” (HUD, East Alabama Evaluation, 2014)

“One issue that emerged during the last year of their grant had to do with their required fair housing and equity assessment. The grantee insisted that they did not realize that this was a required part of their grant. While they did complete an analysis that examined racial concentrations of poverty and access to opportunity, and fair housing issues in their region, they did not do the deliberation and decision-making pieces of the FHEA process that the office expected to see and the analysis does not have a strong link back to their regional plan.” (HUD, Windham Region Council of Governments, 2014)

“The grantee resisted but then did complete a fair housing and equity assessment, with substantial help from the HUD capacity-building intermediaries Minnesota Housing Partnership and local sub-consultants to MHP. It remains unclear how likely the municipalities in this region are to implement any of the recommendations from the FHEA.” (HUD, University of Kentucky, 2014)

The most extreme form of this resistance came from the Northwoods NiiJii Enterprise Community, Inc grantee who did not complete their FHEA. As described in their HUD evaluation:

“Despite receiving assistance from Chip Halbach of the Minnesota Housing Partnership, NNEC never developed a stand-alone FHEA document. The NNEC director resisted developing a FHEA stating that she did not receive adequate notice that NNEC was required to conduct an assessment under the terms and conditions of its cooperative agreement and that NNEC did not have sufficient funding in its budget to support the work.” (HUD, Northwoods NiiJii, 2014)

Other FHEA challenges included issues transitioning FHEA analysis to recommendations, and inability to successfully bridge engagement with the FHEA. As described by HUD staff:

“RVARC’s team produced many maps to highlight geographic disparities across a few key dimensions, but seemed to struggle in using the data to drive decision-making or community processes.” (HUD, Roanoke Valley, 2014)

“In early 2013 HUD notified SEMCOG that its FHEA, which SEMCOG considered complete in November 2012, did not meet HUD’s expectations because it appeared that SEMCOG had conducted little, if any, public engagement with the region generally and with residents of RCAP and ECAP areas specifically. The list of

people that served on the committee overseeing the housing and FHEA work was comprised almost exclusively of local government staff and had very little representation from outside groups. The relative lack of outside representation on the committee may explain the rather conventional and uninspired set of FHEA recommendations that focus mostly on promoting fair housing education.” (HUD, Southeast Michigan Council of Governments, 2014)

HUD staff also identified a lack of depth or “structural analysis” in the FHEA data. In particular, HUD evaluations noted some grantees did not discuss the factors driving segregation and isolation from opportunity for racial and ethnic communities. As illustrated in the Rockford Metropolitan Area evaluation:

“The document does not provide a history of the region indicating when African-Americans and other persons of color arrived in the area or any discussion or insight into how the RCAPs came into existence. Nor does it provide any historic information on why poverty, unemployment, educational outcomes, and other measures are lower for African-Americans when compared to other groups. The document does not map areas of opportunity.” (HUD, Rockford Metropolitan Area, 2014)

Grantees were also encouraged to expand their FHEA into a regional assessment that could be utilized as an AI (Assessments of Impediments). Grantees were informed that the additional requirements to complete the Regional AI would be offset by cost- savings

in not needing to produce future AI's for multiple entitlement communities. Few grantees undertook this challenge, and unfortunately, for at least one (Northeast Ohio), the regional assessment was not accepted by HUD's Office of Fair Housing and Equal Opportunity.

This challenge is fully articulated in the grantee's evaluation:

“The Columbus FHEO office reviewed the RAI and found it unacceptable for use in place of existing AIs. In a nutshell, creating an RAI for the 12-county polycentric NEOSCC region was much too ambitious a project given the time and resources that were at NEOSCC's and WES' disposal. I probably should have recommended to NEOSCC that it focus its efforts solely on the FHEA but, given that had HUD encouraged grantees to develop RAIs and that NEOSCC had good reasons of its own to produce one, I chose not to do so. Perhaps unsurprisingly, the RAI falls significantly short of meeting FHEO's criteria for acceptance as a regional document that could supplant existing AIs....few of the entitlement communities plan to use it in place of their existing AIs. However, Youngstown is using it and Warren may have adopted it as well. FHEO's plan is to work with those communities to modify the RAI so it can be used in place of their previous AIs.”
(HUD, Northeast Ohio, 2014)

The San Joaquin Valley grantee (Fresno Foundation and Cal State) also unsuccessfully attempted to transition the FHEA to the larger Regional AI. The lack of staff commitment and resources from multiple entitlement communities undermined the

effort (HUD, Fresno Foundation and Cal State, 2014). No successful Regional AI's were documented in the performance evaluations for grantees.

Grantees Needing Capacity Builder and HUD Interventions

HUD relied upon capacity builders and field staff to assist grantees who were experiencing challenges, particularly those challenged in supporting equity in the planning process. HUD grantee reports note numerous capacity builder and field staff interventions to strengthen the equity component of the planning process:

“HUD Capacity-building Intermediaries did the bulk of the engagement with traditionally marginalized populations associated with the plan and the Fair Housing and Equity Assessment.....The grantee resisted but then did complete a fair housing and equity assessment, with substantial help from the HUD capacity building intermediaries Minnesota Housing Partnership and local sub-consultants to MHP.” (HUD, University of Kentucky, 2014)

“Near the end of the period of performance, the grantee received rapid technical assistance from MHP to ensure that the FHEA analysis was embedded in the larger planning documents as initial drafts had only a cursory treatment of equity and FHEA dimensions.” (HUD, Roanoke Valley, 2014)

In some cases, the utilization of a capacity builder was essential to strengthening the outcomes of the planning process, as described in the following grantee evaluations:

“The grantee did not have a strong focus on equity until at least 20 months into their 40-month grant period, but they course- corrected and it’s become one of the strongest parts of their work, with the help of (capacity builder) Policy Link’s Sarita Turner. They engaged people from community groups, HBCUs, workforce development organization, and vocational and technical programs in a few capacities, all of whom attended a November 2013 Regional Equity Summit.” (HUD, Piedmont Authority, 2014)

“About three years ago when it appeared that the initiative was collapsing, (capacity builder) MHP stepped in and worked closely with the staff to resurrect the project and get it pointed in the right direction.” (HUD, Southwest Wisconsin, 2014)

Local capacity builders were also identified as critical to producing stronger outcomes for grantees, particularly in respect to community engagement:

“Public meetings were held with ample venues for in-depth discussion and the grantee demonstrated model practices for interactive public engagement. For example, the PDC contracted with Virginia Tech’s performing arts department around “Building Home,” a community engagement effort that used community members’ stories to formulate performances highlight challenges and strengths of the NRV area – particularly economically depressed areas with challenges related to drug use and teen pregnancy.” (HUD, New River Valley, 2014)

“Once achieved, a string of important deliverables [were completed], many of which resulted from significant engagement of partners in the project or the increased engagement of populations, often those marginalized from the planning process. One of the most notable of these, a university-driven (University of Oregon) investigation of the region's invisible populations (primarily undocumented newcomer Latinos), gained national recognition and formed the basis of one of the stronger FHEAs (or Opportunity and Equity Assessments) produced by the Regional Planning grantees.” (HUD, Lane County, 2014)

“CROG and PVPC created a bi-state Fair Housing and Equity Assessment that included strong engagement led by the Connecticut Fair Housing Center and recommendations for the bi-state region and each sub-region specifically. In addition, PVPC created a great video and a report and resource guide on their equity work, undertaken in collaboration with UMass Amherst Architecture students.” (HUD, Capital Region, 2014)

Unfortunately, capacity builder assistance could not successfully improve all grantees processes, as illustrated in the evaluation of Thomas Jefferson Planning and Development:

“Charlottesville, in particular, is a highly engaged community, with many resident experts on planning and environmental issues. That said, in general, the PDC struggled to engage low-income populations and communities of color, and made

few inroads into those communities, despite coaching from HUD and other entities.” (HUD, Thomas Jefferson Planning, 2014)

In the case of the Southeast Michigan Council of Governments, HUD directed the agency to hold an equity summit to address the shortcomings in the SEMCOG’s planning process. This engagement, in which I was directly involved as a capacity builder, was intended to force the engagement of equity advocacy groups who should have been engaged in the process from the beginning (from the perspective of HUD and capacity builders). Despite the involvement of two national capacity-building organizations, and top HUD senior staff, under SEMCOG’s leadership the outcome of the event did not meet expectations. The engagement did not produce any substantial commitment from SEMCOG to adopt or address the equity concerns raised by local advocacy organizations. This experience is captured in the HUD evaluation of SEMCOG’s performance:

“At HUD’s behest, SEMCOG organized a one-day fair housing equity summit in December 2013. I attended the summit along with former OSHC (Office of Sustainable Housing and Communities) Director Salin Geevarghese. Representatives of two fair housing and equity-focused organizations that should have been included on the original committee, MOSES and the Michigan Roundtable, were invited to participate and did in fact attend. HUD’s hope was that the one-day summit would, at least to some extent, fulfill SEMCOG’s second “D” obligation [deliberation] and perhaps even produce a more robust set of

policy recommendations. Unfortunately, the event did not go as well as planned and a crucial discussion scheduled at the end of the day did not work out as intended.” (HUD, Southeast Michigan, 2014)

As documented by HUD field staff with the Des Moines SCI grantee, the assistance and encouragement by HUD was not always well- received, respected or utilized:

“That all being said, there were concerns through much of their grant period about their depth of commitment to achieving equitable outcomes. HUD staff consistently counseled them to go deeper in their outreach and their thinking about regional outreach and equity, to which their response was often tepid; they gave the impression that they felt they were the experts and HUD’s input was something of an annoyance. Their confidence, though, was belied in several ways. They clearly viewed public outreach as a box-checking exercise, at least initially, and had to be pushed to reassess their approach even when concerns were raised by the community that their voices were not being heard.” (HUD, Des Moines, 2014)

Characteristics of Grantees Rated “Fair”

Only four grantees in 2010 cohort were rated as performing “fair” instead of “good.” Upon review of the content of the evaluations, common themes emerged for these grantees. All four grantees struggled with the Fair Housing Equity Assessment, with three of the grantees resisting the production of the assessment, and the fourth (SEMCOG) was

critiqued heavily for its lack of deliberation and decision-making components. Due to all of these challenges, HUD evaluations raised concerns about the appropriateness of these grantees being selected as recipients for regional planning grants.

Three of these grantees were primarily smaller or rural regions, and included East Alabama Regional Planning and Development Commission, University of Kentucky Research Foundation, and Windham Region Council of Governments. Capacity issues and other forms of organizational instability were commonly cited reasons for the under-performance of these grantees:

“East Alabama PDC struggled to meet administrative requirements and deadlines throughout the life of their Regional Planning Grant cooperative agreement with HUD. They routinely missed monthly calls without warning, were a month or two months late in submitting their semi-annual reporting, and took months to submit required budget, work plan, and key personnel amendment requests to their agreement. They did not complete their closeout reporting one full year after their period of performance ended, so HUD proceeded with administrative closeout. The grantee had repeated staffing changes, with much of the programmatic and administrative tasks associated with the grant falling on the same staff member. The grantee indicated that this workload issue was the cause of their difficulty complying with administrative requirements in a timely manner and meeting deadlines.” (HUD, East Alabama, 2014)

“Almost 3/4 of the way through the grant period, the state of Connecticut restructured its regional planning entities and geographies; the Windham Regional COG was eliminated and the area for which the regional plan was developed was split among two different regional planning entities. This means that the partner organizations have a lot of work on their hands trying to get the recommendations in the plan incorporated by their regional planning entities.” (HUD, Windham Region, 2014)

The Kentucky grantee was led by the University of Kentucky, and the lack of relationships and standing by the university in the planning region was identified as a major factor undermining the planning process:

“The grantee team struggled to do meaningful engagement in the region. Because of the community's perception of UK as an outsider to the four-county region, it was difficult for the grantee's POC to have productive conversations with local elected leaders about economic realities and making changes for the future. This was further compounded by the fact that the POC was in Lexington, hundreds of miles away from the region.” (HUD, University of Kentucky, 2014)

Southeast Michigan Council of Governments (SEMCOG) was the only major metropolitan grantee to receive a fair rating. The Detroit region's grantee's poor performance was juxtaposed with the tremendous need in the Detroit region, a region that

has not only struggled historically and contains some of the nation's worst racial disparities, but was also devastated by the 2008 housing crisis and recession:

“The Detroit region desperately needs a new vision to guide it towards a more prosperous future over the next several decades that would provide all of its residents a good quality of life. Sadly, SEMCOG’s three-year HUD-funded initiative did not produce such a vision.” (HUD, Southeast Michigan, 2014)

SEMCOG’s challenges were under- girded by political challenges in supporting regional planning and addressing sprawl in Southeast Michigan:

“SEMCOG seems to want to avoid engaging in a direct regional conversation about sprawl and its costs. Given that the County Executive of one of the suburban counties is a national proponent of suburban sprawl and would oppose any initiative intended to limit it, SEMCOG, perhaps wisely, approaches the issue very carefully. SEMCOG’s approach seems to be focused on leading the “horse” (key elected officials) to water (the hard facts: Deteriorating infrastructure and insufficient resources to fix it) with the hope that the horse will drink (decide to stop funding sprawl-inducing infrastructure investments, etc.).” (HUD, Southeast Michigan, 2014)

4.1.5. Evaluation Themes: Characteristics of Strong Grantees and Planning Processes

HUD evaluations also focused on those grantees with strong outcomes. Several themes are evident in HUD's evaluations of grantees and planning processes that were applauded for their outcomes and performance.

High- Capacity Grantees were Often High- Performing Grantees

The relationship between high capacity and high performance was a common theme in evaluations of grantees identified as strong performers. These grantees primarily were large metropolitan planning organizations, with a track record of success and significant staff capacity. For example, the Boston region's MPO (Metropolitan Area Planning Council) was exalted for its ability to utilize SCI to leverage ongoing planning activities and the technical skill and capacity of its staff:

“Metropolitan Area Planning Council (Boston region) fulfilled the potential of the SCI grant program that resulted from a high-capacity grant recipient that was able to build on the momentum of an existing planning process while prioritizing equity as a frame for its work and creating a broad, representative table that acknowledged the diversity of the region. The high planning acumen of staff was paired with experienced community-based partners who knew how to activate their engaged resident base to productive purpose.” (HUD, Metropolitan Area, 2014)

The Capital Area Regional Planning Commission, which represents the Madison, WI region, was similarly rated as a top performer:

“CARPC was an exceedingly competent and high- performing grantee. I rate CARPC as one the three top performers among all my metropolitan area regional grantees and have nothing but praise for its overall performance...CARPC’s FHEA is among the strongest and most sophisticated produced by any Region V grantee.”
(HUD, Capital Area, 2014)

The Chicago Metropolitan Agency for Planning (Chicago’s MPO) received a national award for its planning process, and was also identified as a top performer of the cohort:

“CMAP (Chicago region) was an exceedingly competent and high- performing grantee. It received a prestigious first- of- its- kind award from the American Planning Association (the “National Excellence Award for a Planning Agency”) for its GO TO 2040 plan, and its implementation of the LTA program continues its reputation for excellence and best practices. I rate CMAP as one of the best performers among all 17 of my metropolitan area regional grantees and have nothing but praise for its overall performance.” (HUD, Chicago Metropolitan, 2014)

The Sacramento MPO (SACOG) was not only identified as a high performer, but also as a cohort leader in supplying technical expertise and guidance to other West Coast grantees:

“SACOG entered the SCI cohort as an anticipated high-performer based on its recent history in advancing urban planning and it did not disappoint. The grantee worked through numerous challenges to fulfill its grant obligations while generating new content for the field at large. They strengthened the integration of housing, transportation, and related long-range planning issues in the state with the most complex policy framework for doing so. They provided support to fellow grantees in their immediate vicinity as their own knowledge base about the project grew.” (HUD, Sacramento Area, 2014)

The most extensive praise was directed toward the Seattle Tacoma Region grantee, Puget Sound Regional Council. PSRC was described as elevating the potential for the SCI program, when high capacity, commitment to equity and robust engagement intersect. PSRC’s evaluation offered a glowing appraisal of the region as a national leader among all grantees:

“Puget Sound Regional Council (Seattle Tacoma Region) demonstrated the potential of the SCI grant program when a high-capacity grant recipient was able to couple solid analytical and planning acumen with an engaged resident base, prioritize equitable development as a frame for action, mobilize jurisdictional and elected partners, and commit to absorbing and addressing feedback to strengthen its outputs. The grantee consistently brought high focus and attention to detail to its outreach, analysis, and idea generation. They continued to maintain the

principles of engagement throughout the grant period, even extending their period of performance to ensure that equity groups had adequate time and resources to conceptualize and realize their strategy for extended engagement and participation in the implementation of the grant.” (HUD, Puget Sound, 2014)

Documentation of Robust Engagement Improving Equity Outcomes

Grantees who excelled with engagement processes were identified as strong performers by the HUD field staff in evaluations. Prolonged engagement and multi-faceted engagement processes, particularly those who could reach under-represented groups, were applauded in HUD evaluations:

“Civic engagement took place consistently through three years of the grant's period of performance. They used a combination of civic leadership labs, stakeholder interviews, web-based tools like Metroquest, Twitter, Facebook, Survey Monkey, focus groups, meetings, shared meals, workshops, visioning sessions, and traditional media outreach to engage a broad cross-section of residents in the region, including special efforts to reach traditionally marginalized populations.” (HUD, Capital Region, 2014)

“GroWNC use a plethora of methods to engage the public, including large public meetings, a survey, a virtual meeting, and smaller group conversations. They partnered with individuals and community organizations that had the trust of and

access to traditionally marginalized populations in order to find out more about the values and needs of those residents, offering tangible resources (money) for their participation. They were able to engage a Russian-speaking population that reported never being engaged in a public process before. The qualitative data from this effort led directly to their scenario planning process. While the grantee encountered significant organized opposition to their work by some members of the community, this approach to engagement was a clear move forward for the region.” (HUD, Land of Sky, 2014)

“They continued to maintain the principles of engagement throughout the grant period, even extending their period of performance to ensure that equity groups had adequate time and resource to conceptualize and realize their strategy for extended engagement and participation in the implementation of the grant.” (HUD, Puget Sound, 2014)

HUD evaluations also identified the role of engagement in influencing and strengthening grantee outcomes, particularly equity outcomes. Thurston Regional Planning Commission’s evaluation highlighted the benefits of the grantee making a strong commitment to engagement:

“From the onset, the staff team put a priority on community engagement as a way to make sure that the final product had sufficient momentum to move to implementation. It was an emphasis that paid dividends as a highly active

constituency began to exert heavy influence throughout the process; at one point the community challenged the staff team to go back to the drawing board and be more radical in their thinking. Ultimately, this level of engagement contributed to the early adoption of the plan in December 2013.” (HUD, Thurston Regional, 2014)

HUD also highlighted the work of grantees who made significant financial investments to engagement processes, particularly those that built the capacity for engagement in the region. These engagement efforts were described as transformational in building capacity for the regions. The Twin Cities Metropolitan Council and Puget Sound Regional Council were given praise by HUD field staff for their significant financial and organizational commitment to engagement:

“The Met Council committed a significant amount of its grant, \$750,000, to fund community organizations working mostly in the Central, Southwest and Bottineau LRT corridors. The Community Engagement Team (CET) was led by Nexus Community Partners, the Alliance for Metropolitan Stability, and the Minnesota Center for Neighborhood Organizing. Twenty-three separate organizations received funding. Met Council reports that, among other things, at least 40,000 people residing in the corridors were made more aware of the projects and their potential impact, and that at least 250 people increased their capacity for leadership in their communities.” (HUD, Metropolitan Council, 2014)

“Building on significant momentum in the region with regards to the fundamental importance of equitable development and leveraging the political capital around progressive community development that has emerged in the previous half-decade, PSRC started by building a governance structure that committed a Co-Chair to be focused on equity issues, and dedicated more than 20 percent of the grant resources to engaging marginalized communities and supporting investments in those place. As a consequence, the OER priorities to advance equity, sustainability, and resilience were strongly reflected in much of the work plan and product produced by the consortium.” (HUD, Puget Sound, 2014)

Characteristics of Strong FHEAs

Consistent themes pertaining to depth of analysis, strong engagement, and detailed and actionable recommendations were highlighted for those FHEA’s identified as “strong.” For example, analysis that contextualized the impacts of equity issues, or analysis that built an evidence base to support equity- oriented actions, were lifted up in HUD evaluations:

“The Met Council’s FHEA contains perhaps the most sophisticated analysis of racial concentration, inequality, and poverty of any FHEA I reviewed. It contains many layers of useful data, an in-depth analysis of that data, and a series of regional and area maps that paint a very clear picture of a region where a minority population that is growing at a fairly rapid rate is becoming even more

concentrated geographically than it was 10 or 20 years ago.” (HUD, Metropolitan Council, 2014)

“CMAP cites...the consequences of segregation include economic instability, educational inequities, housing market distortions, unsustainable development patterns, and disinvestment in certain areas of the region. Chapter 3 of the FHEA contains a sophisticated analysis of the negative impacts of the high degree of residential segregation in the Chicago area and the benefits that could be gained if the region were to reduce it, again citing several studies.” (HUD, Chicago Metropolitan, 2014)

Not all grantees fit the traditional urban geography that the FHEA analysis and metrics were focused on. HUD evaluations complemented efforts by grantees who were creative in thinking broadly about equity concerns, both for issue and for unique or special populations. This creativity is exemplified by the experience of Lane County, Oregon (who focused on “invisible” populations) and the New River Valley:

“While the PDC conducted data analyses in line with the FHEA goals, they faced challenges because most of the identified racial minorities were clustered around Virginia Tech and likely students. However, the PDC made great efforts to unpack the lived experiences of other marginalized communities, like those living in areas affected by the meth trade, or in generally economically distressed areas, as well as seniors. An analysis of the future needs of the region given the rising population

of seniors, along with associated recommendations, was a great strength of their work.” (HUD, New River Valley, 2014)

Those grantees with robust FHEA’s also were more likely to have strong, multi-faceted recommendations, offering a host of strategies to support equity. These grantees went above and beyond the traditional fair housing strategies to think holistically about interventions needed to support equity:

“Nonetheless, I find the Met Council’s FHEA Section 8 Thrive MSP 2040 commitments to be rather refreshing and creative when compared to the recommendations contained in the majority of FHEAs I reviewed. Where many FHEA recommendations tend to focus on standard fair housing measures such as enforcement and buyer, renter, realtor, local government, and landlord education on fair housing laws, the Met Council’s commitment to use equity considerations “as a lens to evaluate its operations, planning, and investments” goes beyond that of most Region 5 regional grantees.” (HUD, Metropolitan Council, 2014)

“The grantee’s FHEA was strong and innovative. They developed a typology of RCAPs and ECAPs and made recommendations based on the type of area, rather than specific areas, since they had so many in this large, populous region. The content of the plan and strategy playbook is strong, particularly considering the political backlash they faced early on and have worked through during their grant period.” (HUD, Houston-Galveston, 2014)

“As to the FHEA’s recommendations, once again CMAP’s are among the most robust I have encountered among all of my regional grantees...Among other things, the FHEA also recommends investing in disinvested communities (in consultation with existing residents), increasing transit-oriented development while providing affordable housing within such developments, investing in cargo-oriented development that would provide employment opportunity in the largely disinvested minority communities on Chicago’s south side and the south suburbs, and improving public transit generally to provide better access to job and educational opportunities to those residing in RCAP and ECAP areas.” (HUD, Chicago Metropolitan, 2014)

Grantees who clearly specified who should implement recommendations and set up performance metrics for equity were positively acknowledged in HUD evaluations:

“All in all, the FHEA may not be the strongest element of SEAC’s Millennial Plan and may not be the most creative in its approach to concentrated poverty. However, it does address the key issues and, more importantly and unlike some other FHEAs I have reviewed, assigns specific responsibility to the agencies and bodies for implementing the recommendations, some of which will require zoning revisions and other actions.” (HUD, Evansville, 2014)

“CARPC’s FHEA recommendations are too numerous to summarize here. CARPC developed a framework to promote equitable access to opportunities and a set of

metrics and measures to gauge progress towards meeting the goals that were identified. The FHEA recommends investments in improving public transit service (the proposed BRT system would include a route through South Madison and another to the northeast), investment in the RCAP communities, both human and capital (specific projects were identified), and other robust measures. The FHEA identifies the entities that have responsibility for implementing the proposed actions.” (HUD, Capital Area, 2014)

4.1.6. Evaluation Themes: Outcomes, Implementation and Impact

Evaluations explicitly focused on the potential for post- plan implementation and identification of early implementation outcomes. Several themes emerged in HUD evaluation of early impacts and potential for implementation.

Capacity-building and Early Implementation Activities/Projects

Capacity-building or relationship (social capital) development between regional stakeholders was a primary theme of early planning process outcomes. HUD evaluations noted the importance of relationship- building to forming a foundation for implementing regional planning goals. Capacity-building was also identified as a positive outcome (and progress) in regions where not all outcomes were achieved. As described by HUD field staff in discussion of the Gulf Coast Regional Planning Commission:

“Gulf Regional Planning Commission entered into its cooperative agreement with HUD facing some substantial challenges in advancing equitable planning and development in the region. While they were not able to overcome all of those challenges in creating their plan, the work of the Commission did represent a significant step forward for regional planning in the area. A number of new partnerships were established between public agencies and community-based organizations, a crucial step in building a stronger regional constituency for equitable development.” (HUD, Gulf Coast, 2014)

HUD evaluations also noted the role of SCI in expanding existing regional conversations, as illustrated in the example of equity dialogue in the Twin Cities:

“The regional dialogue on equity that occurred during the development of the FHEA did not mark the beginning of the conversation. Equity groups in the Twin Cities region began the conversation before HUD awarded the grant and, given the strength of the equity community in the region, it will continue to push the Met Council and local elected officials to be more aggressive in tackling the region’s widening inequality.” (HUD, Metropolitan Council, 2014)

Despite the recent completion of plans, early implementation activities were documented throughout the cohort of grantees. Demonstration projects tied to the planning process were identified in multiple evaluations, particularly of high- performing grantees.

The Capital Region Council grantee (Hartford, CT) illustrates the variety of early demonstration projects undertaken in a successful SCI planning process:

“Many specific items from the regional plans and catalytic projects started to be implemented before the end of the grant period.

a. The New Britain Complete Streets Master Plan, a catalytic project in CT, won an additional \$4 million for the construction of those improvements.

b. CRCOG was able to use New Freedom funds to help Enfield launch its Magic Carpet shuttle bus service, a recommendation of the Transit Enhancement Bus Study catalytic project, which brings new transit service to two neighborhoods with large low-income populations (Thompsonville and Hazardville), linking them together and providing access to retail corridors.

c. PVPC's Depot Square Redevelopment and Revitalization project in Holyoke has secured a \$2.4million MassWorks grant for the construction of a rail platform on the strength of the planning and design work the HUD grant funded.

d. CRCOG's Hartford Downtown North/West Master Plan laid the groundwork for a major redevelopment project and now zoning approvals have been granted, allowing the work of finalizing a public-private partnership for financing the development to proceed.

e. Several recommendations from PVPC's Food Security Plan are being implemented, including a web-based mapping tool of all meal sites and food pantries in Hampden, Hampshire, Franklin, and Berkshire Counties, as well as a \$2 million grant from the CDC to implement recommendations on improving healthy food access.”

HUD evaluations also acknowledged grantees who were successful in spurring new programs and funding from philanthropy as a result of the planning process, an example of which is provided in the New River Valley planning outcomes:

“Despite the early challenges, the NRV project ended on a high note, with the local community foundation stepping up to carry the work forward into the future. In addition, through a solar installation initiative recommended in the Energy plan, over a million dollars of new investment has already occurred in the region.”
(HUD, New River Valley, 2014)

Concerns and Optimism about Post- Planning, Long- Term Outcomes

Given the significant investment by HUD in the SCI plans, potential for long- term implementation was discussed in most evaluations. The potential for implementation was an assumed outcome for high- capacity and high- performing grantees. The tone of implementation expectations for the Sacramento region grantee was common for the 2010 cohorts' high performing grantees:

“There are high expectations for this grantee with regards to its ability to implement the work ahead that was clarified through the grant effort.” (HUD, Sacramento Area, 2014)

But for the many grantees within the cohort, HUD expressed a cautious optimism for outcomes, due to implementation challenges or lack of implementation infrastructure. For example, implementation concerns were identified regarding staff capacity after plans were completed (and funds were expended):

“GroWNC is well-poised to implement their plan, but listed a number of needs that need to be filled to maximize this readiness from an operational standpoint—dedicated staff, for instance.” (HUD, Land of Sky, 2014)

Concerns were consistently raised about the implementation challenges, or lack of implementation process and infrastructure, for the FHEA. This shortcoming with the FHEA process was a reoccurring concern identified by field staff:

“It remains unclear how likely the municipalities in this region are to implement any of the recommendations from the FHEA.” (HUD, University of Kentucky, 2014)

“Qualitatively, the FHEA meets HUD’s basic requirements in that it identifies RCAP areas, of which there are only a few, and identifies opportunity areas. It also proposes strategies that, if implemented, would significantly address the inequities

that were identified. However, TCRPC has little if any authority to implement its proposed actions. A significant weakness of the FHEA is that although it identifies actions that could be undertaken and agencies that would need to take ownership and responsibility for implementing them, there appears to be no mechanism in place to follow-through.” (HUD, Tri County, 2014)

Identification of implementation responsibility and strategy challenges were not just isolated to the FHEA, but are an ongoing concern for regional plans as well. This was particularly challenging within the regional plan framework because of the large number of stakeholders and domains implicated in the plan:

“However, the plan has some shortcomings. While it lists many specific goals and outcomes for each topic area, it does not identify entities or organizations that would be responsible for taking action to achieve the goal or outcome although in many cases the entity or organization that would need to take “ownership” is easily identifiable. For example, local school districts would need to align their efforts with the goals listed in the Education section. However, none of the local school districts appear to have participated in the initiative and there is no indication as to whether they are committed to the visions and goals of the plan. Although this is a significant weakness, it is not a particularly unusual one among my FY 2010 Category 1 regional grantees.” (HUD, Rockford Metropolitan, 2014)

The HUD evaluation for the East West Gateway region also reflected upon recent racial unrest in Ferguson, Missouri (located with the St. Louis region grantee's planning area) as a warning about the depth and scale of racial equity challenges in that region. Despite this forewarning, the HUD evaluation ends on a positive and optimistic note, a theme found in most evaluations:

“Recent events in Ferguson, Missouri, a small suburb in St. Louis County, drive home the fact that the results of the planning process can only do so much, as the problems they hope to address are partially the product of long-standing and deep-seated racial inequities and animus. Although their final plan, “OneSTL: Many Community, One Future” is an excellent product that establishes a framework for making progress on a variety of factors that contribute to the region's environmental sustainability, economic health and social equity, one gets the impression that this elides the more pernicious problems epitomized by the events in Ferguson. Hopefully, the plan and the OneSTL Network which will ensure it is carried out will result in greater empowerment and access to opportunity, which in turn will create the foundation for a more prosperous, equitable region.” (HUD, East West Gateway, 2014)

4.2. SCI: Plan Review of Comprehensive Regional Plans

Plan evaluation was conducted on twenty-six of the forty-five 2010 cohort grantees of the SCI. Grantees produced numerous planning documents, and all documents were

reviewed, but for the purpose of this analysis only the regional comprehensive plan was scored for the plan analysis. The production of this regional plan was mandated for all Tier 1 grantees (Tier 2 grantees were regions with existing regional plans). Plans for Tier 2 grantees were only reviewed when an updated version of the regional plan was produced.

4.2.1. Scoring and Evaluation Grades

Plan evaluation and scoring utilized the criteria and techniques identified in Chapter 3. Plan evaluation focused on social equity aspects of the plan, and did not include review of other sustainability elements, such as mobility. Plans were scored on a 0 to 3 scale for each criteria element. Points were tallied for each grantee by each sub- criteria (and for the overall score all criteria). The percentage score represents the percentage of total criteria points earned by the grantee.

Plan scores were graded based on the grading rubric suggested for the American Planning Association for their “Sustaining Places” criteria. Grantees scoring less than 70% of all total points were graded “non-attainment,” grantees scoring 70 to 80% of all points were graded “basic,” grantees scoring 80 to 90% were graded “medium” and plans scoring higher than 90% were graded “advanced.”

The planning review methodology is intended to compare comprehensive regional plans that were consistent in scope. Given the wide breadth of planning products and inconsistencies among grantees, this analytical approach was not possible with all grantees.

Many grantees emphasized sub- area plans as the primary output of the SCI process; due to this some regional plans are very sparsely developed and others do not have a concrete regional plan for review. Also, some grantees did not produce one regional plan, but produced a series of sub-topical plans, making a full regional plan review challenging and inconsistent. These differences were most pronounced with Tier 2 grantees who were funded for implementation projects..

The following grantee plans were reviewed but not included in the analysis. Many of these grantees produced very strong planning documents, but their final deliverables were not consistent with other comprehensive regional plans, which are the emphasis of the plan review in this research. The following identifies why particular grantees were excluded from the plan evaluation analysis and scoring. HUD evaluation data for these grantees was analyzed to better understand their overall performance, but they were not given formal plan evaluation scores.

- CMAP: The Chicago region (CMAP) did not have a regional plan in its deliverables; its emphasis was on sub- area plan updates, including more than sixty sub- area jurisdictional plan updates.
- MAPC: Metropolitan Area Planning Commission (MAPC) in Boston, MA which produced multiple sub- deliverables but not a comprehensive regional plan. MAPC's deliverables primarily focused on sub- area plans, topical tool kits, and a separate equity analysis and policy document.

- Evansville: Evansville, IL was not in the analysis due to the structure of its plan. The Evansville Plan was broken into 5 topical parts or volumes, totaling over 1,300 pages in length.
- Berkshires: Berkshires, MA produced only a regional snapshot and executive summary, but included sub- topical plans. Although Berkshires' plan was not included, its housing plan and strategy were incredibly strong and did an excellent job of connecting neighborhoods and social capital.
- SEMCOG: Southeast Michigan Council of Governments (SEMCOG) produced sub- topical plans and documents for specific planning projects.
- Northern Maine: Northern Maine produced sub- topical plans and did not produce a comprehensive regional plan.
- Portland: Greater Portland, ME produced a 15- page regional goals document and other sub- topical plan, but no comprehensive regional plan.
- Region 5: Region 5 Regional Council, MN produced multiple topical plans and a regional vision statement, but not a comprehensive regional plan document.
- MARC: MARC, (Kansas City, MO) produced a regional planning document, but this plan only identified broad implementation focus areas and provided reference to the multiple recommendations for demonstration project areas.
- RPA: Regional Plan Association (NY, NY region) focused primarily on sub- area plans and topical plans, and did produce a regional implementation plan, but not a regional comprehensive plan.

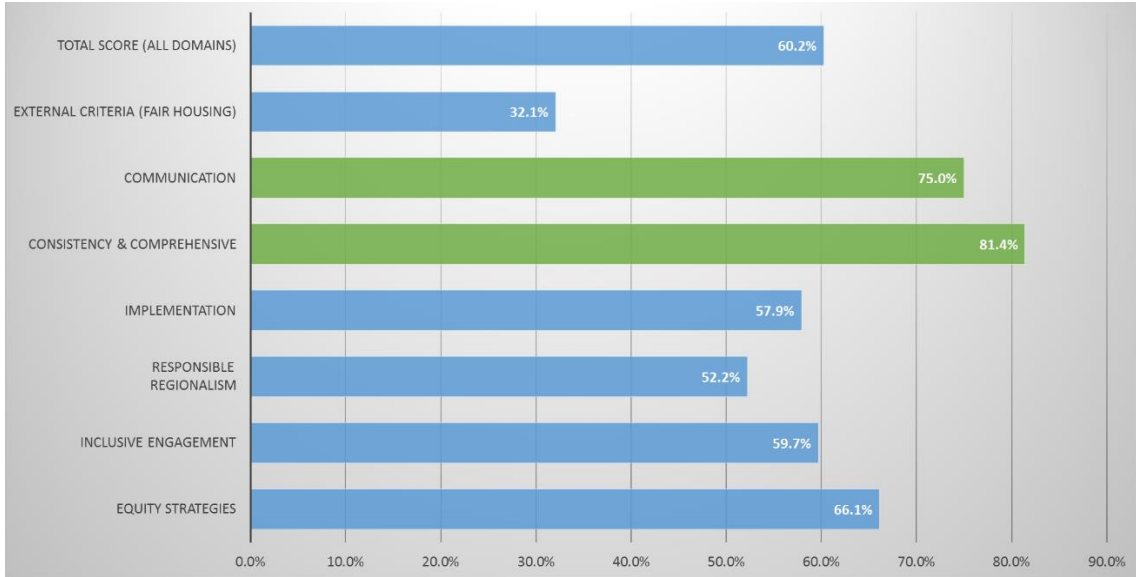
- NE OH: Northeast Ohio produced scenario planning analysis and a regional vision and policy framework, but did not produce a regional comprehensive plan.
- Lane County: Lane County, Oregon produced multiple sub- topical plans, an investment strategy, and an updated alignment document for the metro plan, but no new regional comprehensive plan.
- Knoxville: City of Knoxville, TN produced a regional vision document and a recommendation framework document, but no identifiable regional plan.
- CRCOG: Capital Region COG (Austin, TX) focused exclusively on scenario planning tools and demonstration projects, and did not produce a regional plan.
- H-GAC: Houston Galveston Area Council produced a regional vision document with recommendations, but not a full regional plan.
- Salt Lake: Salt Lake County, UT focused primarily on demonstration projects, form- based code, a community development guidebook for the region, and a regional analysis of impediments to fair housing.
- TJPD: Thomas Jefferson Planning District (VA) worked to integrate sustainability principles into three existing plans in the region and provided other planning tools, but did not produce a comprehensive regional plan.
- SW WI: Southwestern Wisconsin Regional Planning Commission produced sub- topical plans but no comprehensive regional plan.

- Madison WI: Capital Region (WI) developed multiple sub- area, topical and demonstration project plans, in addition to other sustainable planning tools, but the final deliverables did not include a regional comprehensive plan.

4.2.2. Analysis: Summary of Results Across the 26 Regions Analyzed

The total percentage of all available points scored across all grantees analyzed in plan evaluation was 60.2% (Figure 13). This score falls 9.8% points short of meeting “basic” status on the APA’s plan evaluation grading scale, indicating that the plans failed to meet the minimum scoring criteria. Among the sub- criteria, the score for all grantees ranged from a low of 32.1% (for “external criteria – fair housing”) to 81.4% (plan content having “consistency” and being “comprehensive”). The only other category to meet the basic status was “communication” (average score of 75%). (Scores for individual grantees can be found in Figures 14 and 18 for all sub- criteria).

Figure 13: Final % Score (% of Total Points Scored for all grantees) by Major Domains.
 Criteria meeting 70% APA minimum threshold identified in green. (n=26)



4.2.3. Plan Analysis: Equity Strategies

Plan analysis outcomes for equity planning strategies criteria scores ranged from a low of 16% of total points available (in Roanoke Valley, VA) to 91.7% of total points available (a score achieved by the East West Gateway (St. Louis), Gulf Coast MS, Chittenden County VT, and Thurston WA.) The East West Gateway grantee illustrates the characteristics of a grantee meeting the high standard of “advanced” for its diverse “equity strategies.” The grantee focused an entire chapter of the plan’s recommendations on equity concerns. The plan focused on infrastructure, workforce development, economic development for distressed areas, educational improvements and various affordable housing strategies (East West Gateway, 2014). The “inclusive” chapter of the plan

identified numerous objectives and recommendations to meet strategies of embracing cultural and racial diversity, eliminating and improving areas of concentrated poverty, encouraging integrated communities, improving access to opportunity across a variety of different needs, and improving the quality of life in low-income neighborhoods through redevelopment and civic engagement.

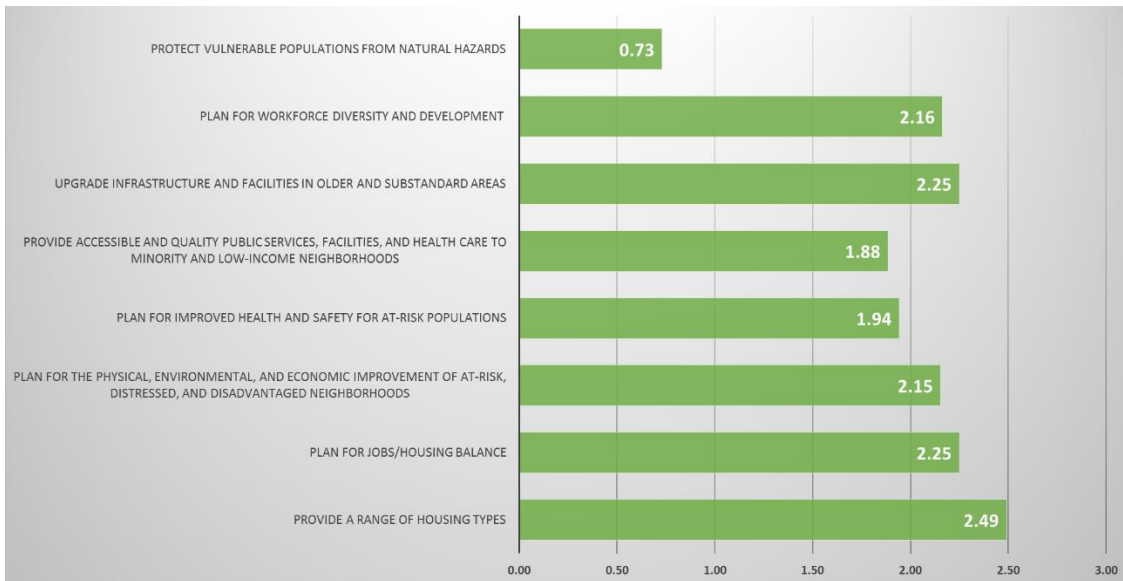
Among all regions, the average equity strategy score was 66% of all possible points earned. This figure still is just 4% points under meeting “basic” status for the APA’s plan evaluation grading scale. In total, out of twenty-six regions, thirteen (50%) did not meet “basic” status; five met “basic” status; five met “moderate” status; and only four met “advanced” status (Figure 14).

Figure 14: Plan Analysis Scores & Achievement Levels for Grantees & Domain (Part I)

| Region | Score: Equity Strategy | Achievement: Equity Strategy | Score: Inclusive Engagement | Achievement: Inclusive Engage. | Score: Responsible Regionalism | Achievement: Resp. Regionalism | Score: Implementation | Achievement: Implementation |
|----------------------|------------------------|------------------------------|-----------------------------|--------------------------------|--------------------------------|--------------------------------|-----------------------|-----------------------------|
| East Alabama AL | 36.5% | Non-Designated | 53.3% | Non-Designated | 33.3% | Non-Designated | 55.6% | Non-Designated |
| Apache County AZ | 62.5% | Non-Designated | 60.0% | Non-Designated | 66.7% | Non-Designated | 61.1% | Non-Designated |
| Capital Region CT | 87.5% | Medium | 20.0% | Non-Designated | 50.0% | Non-Designated | 50.0% | Non-Designated |
| Southern Bankcorp AK | 79.2% | Basic | 53.3% | Non-Designated | 33.3% | Non-Designated | 88.9% | Medium |
| Windham CT | 62.5% | Non-Designated | 40.0% | Non-Designated | 66.7% | Non-Designated | 94.4% | Advanced |
| Central Valley FL | 41.7% | Non-Designated | 0.0% | Non-Designated | 66.7% | Non-Designated | 55.6% | Non-Designated |
| Central Florida FL | 12.5% | Non-Designated | 0.0% | Non-Designated | 16.7% | Non-Designated | 5.6% | Non-Designated |
| Des Moines IA | 82.3% | Medium | 60.0% | Non-Designated | 66.7% | Non-Designated | 50.0% | Non-Designated |
| Sacramento CA | 74.0% | Basic | 80.0% | Medium | 16.7% | Non-Designated | 83.3% | Medium |
| Ken Ten KY/TN | 41.7% | Non-Designated | 20.0% | Non-Designated | 50.0% | Non-Designated | 22.2% | Non-Designated |
| Franklin MA | 58.3% | Non-Designated | 66.7% | Non-Designated | 50.0% | Non-Designated | 77.8% | Basic |
| Tri County IL | 33.3% | Non-Designated | 33.3% | Non-Designated | 33.3% | Non-Designated | 16.7% | Non-Designated |
| East West Gateway MO | 91.7% | Advanced | 63.3% | Non-Designated | 91.7% | Advanced | 38.9% | Non-Designated |
| Rockford Metro IL | 83.3% | Medium | 60.0% | Non-Designated | 66.7% | Non-Designated | 66.7% | Non-Designated |
| Gulf Coast MS | 91.7% | Advanced | 80.0% | Medium | 50.0% | Non-Designated | 94.4% | Advanced |
| Piedmont VA | 76.0% | Basic | 88.3% | Medium | 50.0% | Non-Designated | 33.3% | Non-Designated |
| Land of Sky NC | 59.4% | Non-Designated | 66.7% | Non-Designated | 66.7% | Non-Designated | 50.0% | Non-Designated |
| Met Council MN | 75.0% | Basic | 86.7% | Medium | 100.0% | Advanced | 100.0% | Advanced |
| South Florida FL | 54.2% | Non-Designated | 93.3% | Advanced | 50.0% | Non-Designated | 11.1% | Non-Designated |
| Roanoke Valley VA | 16.7% | Non-Designated | 40.0% | Non-Designated | 16.7% | Non-Designated | 16.7% | Non-Designated |
| Chittenden County VT | 91.7% | Advanced | 100.0% | Advanced | 50.0% | Non-Designated | 61.1% | Non-Designated |
| New River Valley VA | 79.2% | Basic | 80.0% | Medium | 50.0% | Non-Designated | 61.1% | Non-Designated |
| Northwoods NIII WI | 62.5% | Non-Designated | 53.3% | Non-Designated | 50.0% | Non-Designated | 77.8% | Basic |
| Puget Sound WA | 86.5% | Medium | 86.7% | Medium | 83.3% | Medium | 94.4% | Advanced |
| Thurston Regional WA | 91.7% | Advanced | 73.3% | Basic | 50.0% | Non-Designated | 77.8% | Basic |
| Thunder Valley SD | 87.5% | Medium | 93.3% | Advanced | 33.3% | Non-Designated | 61.1% | Non-Designated |
| All Regions | 66.1% | Non-Designated | 59.7% | Non-Designated | 52.2% | Non-Designated | 57.9% | Non-Designated |

Among specific equity strategy criteria, average scores (on a scale of 0 to 3) were highest for housing strategies and infrastructure strategies (Figure 15). “Provide a range of housing types” had the highest average score of 2.49. The criteria of “plan for jobs/housing balance” was tied with “upgrade infrastructure and facilities in older and substandard areas” for second highest average score with 2.25. The lowest score for specific equity strategy criteria was for “protect vulnerable populations from natural hazards” with an average score of 0.73.

Figure 15: Average Score for Equity Strategy Criteria for All Grantees (0 = Lowest Score; 3 = Highest Score; N=26)



The Capital region grantee (Hartford, CT) was an “advanced” scoring grantee for the primary affordable and fair housing criteria. The grantee identified five strategies and thirty-two policy recommendations to support the affordable housing and fair housing

goals. The policy recommendations focused on providing a range of housing choice for all demographics, better enforcement of fair housing laws, better affordable rental housing production in opportunity areas, preservation of affordable housing in redeveloping areas, and aligning transportation with affordable housing investment (Capital Region, 2014).

Infrastructure strategies were heavily focused on transportation infrastructure and improvements, particularly for grantees looking to expand multimodal infrastructure in distressed areas. Infrastructure- oriented strategies were not just focused on new infrastructure, but also recommended better alignment of development and existing infrastructure assets. The Sacramento grantee exemplifies this, calling for intensifying densification of existing communities and redevelopment, in order to maximize the utility of existing infrastructure:

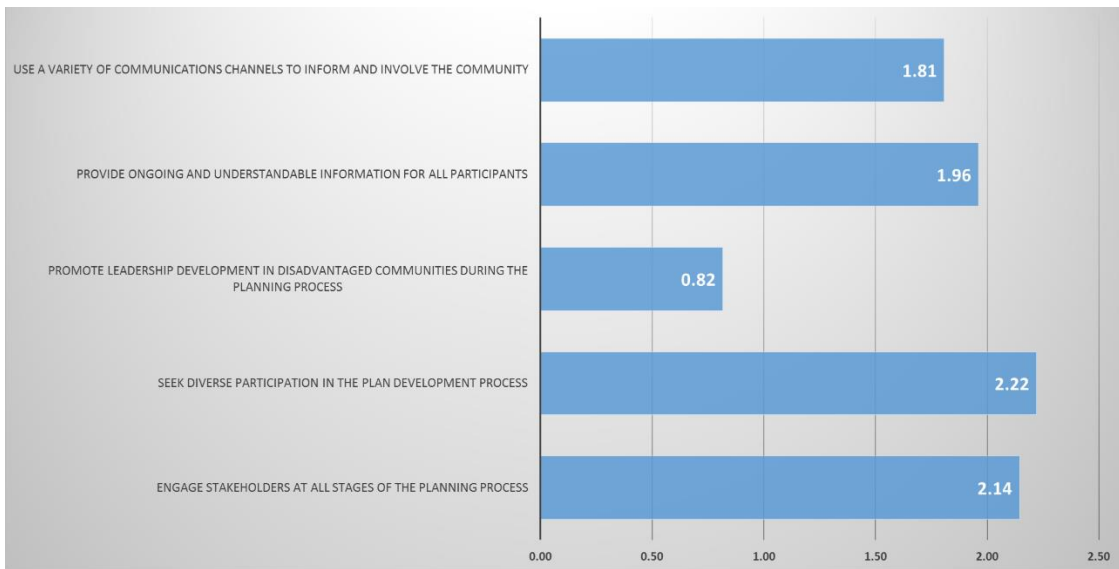
“Use Existing Assets: In urbanized areas, development on infill or vacant lands, intensification of the use of underutilized parcels (e.g., more development on the site of a low-density retail strip shopping center), or redevelopment (e.g., re-using existing vacant buildings or lots) often makes better use of existing public infrastructure.” (Sacramento, 2014, Pg. 38)

4.2.4. Plan Analysis: Inclusive Engagement

Based on the APA criteria inclusive engagement seeks to actively bring stakeholders into the planning process, making materials available through multiple

mediums and languages, and at its highest levels, seeks to promote leadership development in the community. The average “inclusive engagement” score for all regions was 59.7%; scores for inclusive engagement among grantees ranged from 0% (grantees who specified none of their engagement activities in the final plan) to 100% (grantees who fully met the engagement criteria). The Central Valley (CA) and Central Florida did not reference any substantive engagement activity in their final plan. In total, seventeen out of twenty-six grantees analyzed did not meet “basic” attainment standards for engagement; one grantee met “basic” status; six grantees met “medium” attainment; and three grantees met “advanced” standards (Figure 14).

Figure 16: Average Score for Engagement Criteria for All Grantees (0 = Lowest Score; 3 = Highest Score; N=26)



Thunder Valley was an “advanced” scoring grantee in respect to engagement. The tribal grantee on the Pine Ridge reservation linked engagement to traditional Lakota practices of community dialogue, utilized regular tribal radio, Internet, social media and TV to communicate about the planning process, and had extensive direct community engagement with more than 600 tribal members. Thunder Valley held thorough youth engagement and leadership development activities and produced a bilingual plan, written in traditional Lakota language and English.

Thunder Valley focused intensively on youth engagement and leadership development. The plan’s vision articulated youth engagement as critical to building leadership for the plan’s implementation, stating in the vision that “*The Oyate (People), guided by our Youth, are empowered to lead the way to this sustainable future*” (Thunder Valley, 2014, Pg. 43). Youth engagement activities ranged from youth leadership development and a youth leadership tribal summit. Efforts also included visioning sessions held with elementary students, who used art to produce a vision for their community.

It should be noted that just because engagement activity was not included in the final plan, it does not necessarily mean engagement activities did not occur. Given the heavy emphasis on engagement required for SCI grantees, it is most likely these activities were just not documented in the final plan. Additionally, engagement scores varied significantly among the engagement sub- criteria from APA’s plan evaluation methods. The criteria of “promote leadership development in disadvantaged communities during the

planning process” received an average score of 0.82 (on a scale of 0 to 3), while “seek diverse participation in the plan development process” and “engage stakeholders at all stages of the planning process” had average scores of 2.22 and 2.14, respectively (Figure 15).

4.2.5. Plan Analysis: Post Planning Implementation

APA’s criteria for implementation focus on the degree to which the plan identifies actions for implementation, as well as key factors in supporting implementation such as funding and inter-organizational cooperation. “Implementation” criteria also ranged widely for grantees. Implementation elements of the plans varied substantially from plan to plan, with some plans detailing extensive strategies for implementation activities, while others spoke only briefly about implementation. Implementation scores among grantees were lowest for Central Florida (5.6%), South Florida (11.1%) and Roanoke Valley (16.7%). The highest implementation score was recorded for the Met Council of Minneapolis (100%) (Figure 14).

In total, eighteen of twenty-six grantees analyzed did not meet “basic” status on the APA grading scale. Three grantees met “basic” attainment status, including Franklin MA, Northwoods NiiJii and Thurston WA. Two grantees met “medium” attainment status (Southern Bankcorp AR and Sacramento CA), and four met “advanced” attainment status (Windham CT, Gulf Coast MS, Met Council MN and Puget Sound WA).

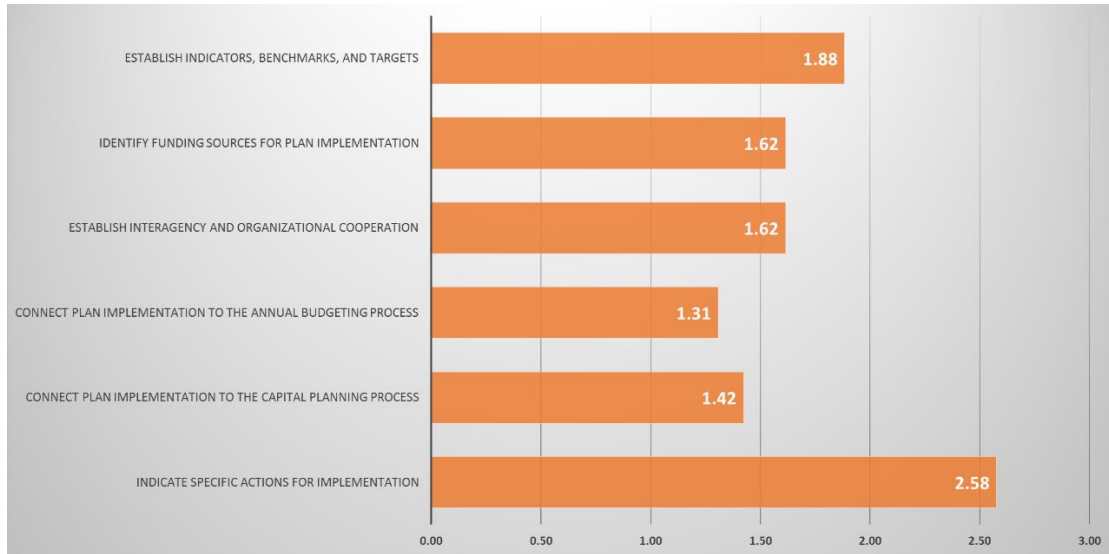
As an example of “advanced” attainment status, the Plan for Opportunity for the Mississippi Gulf Coast identified baseline data and set targets. In the case of food security, the plan identified metrics for current food insecurity and then set the following target:

“Target: That, at a minimum, the decrease of all percentages is proportional to the decrease in the total population with low access. The goal would be to see a one-fourth to one-sixth reduction in each of the measures at 5 year intervals” (Gulf Coast, 2014, Page 158)

The plan then goes on to identify priority implementation actions, such as a fresh corner store program, and identifies potential partners for implementation and grants that could support the action (Gulf Coast, 2014, Pages 145-146).

Among all grantees for individual implementation criteria, grantees’ average scores were highest for “indicate specific actions for implementation.” (2.58 on a 0 to 3 scale). But average scores were lowest related to “identification of various funding strategies” and “development of implementation organizational infrastructure” (Figure 17). Average scores for all of these sub- criteria were between 1.3 and 1.6 (on a 0 to 3 scale).

Figure 17: Average Score for Implementation Criteria for All Grantees (0 = Lowest Score; 3 = Highest Score; N=26)



4.2.6. Plan Analysis: Responsible Regionalism

Two criteria were utilized for the “responsible regionalism” domain in the plan evaluation. APA criteria utilized for “responsible regionalism” included “recommendations to share resources and revenues regionally” and “efforts to foster regional housing plans.” Overall, grantees score poorly on responsible regionalism criteria. Twenty three out of twenty-six plans evaluated did not meet “basic” attainment status for this domain (Figure 14). Among all grantees, sub- criteria scores for the two criteria included an average score of 1.47 (on a 0 to 3 scale) for “promote regional cooperation and sharing of resources” and 1.66 for “coordinate local and regional housing plan goals.”

The only grantees to meet “attainment” status were East West Gateway (St. Louis), Met Council (Kansas City) and Puget Sound (Seattle). Both the Met Council and East West Gateway met “advanced” attainment status.

The East West Gateway plan included an entire chapter titled “Collaborate” that called for multiple regionalism strategies. These included better regional collaboration, coordination of funding across the region, and joint fund raising activities. The plan also calls for regional coordination in respect to regional issues, such as fair housing. The plan calls for regional “strategic” resource allocation. As described in the plan:

“Strengthen the OneSTL network of regional leaders to enable collaboration and strategic allocation of resources.” (East West Gateway, 2014, Pg. 49)

It should be noted that even though these grantees called for these responsible regionalism actions in the plan, they may not have the authority or capacity to implement these strategies given the weak state of regional governance. This is particularly true for the East West Gateway grantee in St. Louis.

4.2.7. Plan Analysis: Coordinated Characteristics, Comprehensive Scope and Communication

Overall, plans scored highest based on the strength of their communication characteristics (particularly in discussing equity challenges) and their “consistency” and

“comprehensive scope” (Figure 18). The APA criteria for consistency focus on the identification of mutually- reinforcing actions.

Figure 18: Plan Analysis Scores & Achievement Levels for Grantees & Domain (Part II)

| Region | Score: Consist. % Compr. | Achievement: Const & Comp | Score: Communication | Achievement: Communication | Score: External Criteria | Achievement: External Criteria | Score: Total Final Score | Achievement: Total Final Score |
|----------------------|--------------------------|---------------------------|----------------------|----------------------------|--------------------------|--------------------------------|--------------------------|--------------------------------|
| East Alabama AL | 66.7% | Non-Designated | 50.0% | Non-Designated | 11.1% | Non-Designated | 43.8% | Non-Designated |
| Apache County AZ | 66.7% | Non-Designated | 83.3% | Medium | 11.1% | Non-Designated | 58.3% | Non-Designated |
| Capital Region CT | 66.7% | Non-Designated | 83.3% | Medium | 11.1% | Non-Designated | 54.8% | Non-Designated |
| Southern Bankcorp AK | 100.0% | Advanced | 83.3% | Medium | 11.1% | Non-Designated | 67.9% | Non-Designated |
| Windham CT | 83.3% | Medium | 83.3% | Medium | 22.2% | Non-Designated | 64.3% | Non-Designated |
| Central Valley FL | 50.0% | Non-Designated | 66.7% | Non-Designated | 0.0% | Non-Designated | 36.9% | Non-Designated |
| Central Florida FL | 33.3% | Non-Designated | 33.3% | Non-Designated | 0.0% | Non-Designated | 10.7% | Non-Designated |
| Des Moines IA | 100.0% | Advanced | 83.3% | Medium | 22.2% | Non-Designated | 65.2% | Non-Designated |
| Sacramento CA | 83.3% | Medium | 66.7% | Non-Designated | 33.3% | Non-Designated | 68.8% | Non-Designated |
| Ken Ten KY/TN | 50.0% | Non-Designated | 33.3% | Non-Designated | 66.7% | Non-Designated | 36.9% | Non-Designated |
| Franklin MA | 100.0% | Advanced | 50.0% | Non-Designated | 66.7% | Non-Designated | 66.7% | Non-Designated |
| Tri County IL | 83.3% | Medium | 50.0% | Non-Designated | 66.7% | Non-Designated | 38.1% | Non-Designated |
| East West Gateway MO | 100.0% | Advanced | 100.0% | Advanced | 44.4% | Non-Designated | 71.4% | Basic |
| Rockford Metro IL | 100.0% | Advanced | 100.0% | Advanced | 100.0% | Advanced | 78.6% | Basic |
| Gulf Coast MS | 100.0% | Advanced | 100.0% | Advanced | 66.7% | Non-Designated | 85.7% | Medium |
| Piedmont VA | 100.0% | Advanced | 100.0% | Advanced | 11.1% | Non-Designated | 63.7% | Non-Designated |
| Land of Sky NC | 100.0% | Advanced | 66.7% | Non-Designated | 55.6% | Non-Designated | 62.2% | Non-Designated |
| Met Council MN | 100.0% | Advanced | 100.0% | Advanced | 44.4% | Non-Designated | 83.3% | Medium |
| South Florida FL | 50.0% | Non-Designated | 50.0% | Non-Designated | 0.0% | Non-Designated | 45.2% | Non-Designated |
| Roanoke Valley VA | 33.3% | Non-Designated | 16.7% | Non-Designated | 0.0% | Non-Designated | 20.2% | Non-Designated |
| Chittenden County VT | 100.0% | Advanced | 100.0% | Advanced | 66.7% | Non-Designated | 82.1% | Medium |
| New River Valley VA | 100.0% | Advanced | 66.7% | Non-Designated | 0.0% | Non-Designated | 65.5% | Non-Designated |
| Northwoods NIII WI | 66.7% | Non-Designated | 83.3% | Medium | 0.0% | Non-Designated | 58.3% | Non-Designated |
| Puget Sound WA | 83.3% | Medium | 100.0% | Advanced | 100.0% | Advanced | 90.2% | Advanced |
| Thurston Regional WA | 100.0% | Advanced | 100.0% | Advanced | 22.2% | Non-Designated | 76.2% | Basic |
| Thunder Valley SD | 100.0% | Advanced | 100.0% | Advanced | 0.0% | Non-Designated | 71.4% | Basic |
| All Regions | 81.4% | Medium | 75.0% | Basic | 32.1% | Non-Designated | 60.2% | Non-Designated |

Grantees were very consistent in thinking about the mutually- reinforcing strategies for focus areas of development. For example, the Puget Sound grantee emphasized a variety of reinforcing strategies to ensure equitable “transit communities” in Transit-Oriented Development areas in the region:

“Attract more of the region’s residential and employment growth near high-capacity transit. Provide housing choices affordable to a full range of incomes near high-capacity transit. Increase access to opportunity for existing and future community members in transit communities.” (Puget Sound, 2014, Pg. 5)

The Rockford Metro, IL grantee focused on the intersection of complementary strategies in redeveloping “opportunity areas” in the region. These diverse and multi-faceted strategies were intended to foster equitable redevelopment in these distressed communities;

“Neighborhood revitalization plans and redevelopment initiatives are needed to transform concentrated and distressed neighborhoods into viable and sustainable mixed-income neighborhoods. The planning process can provide guidance for linking housing improvements, diversification of housing types, and reductions in public and assisted housing with appropriate services that improve the quality of life in neighborhoods including, schools, public assets, transportation, and access to jobs. Revitalization plans and reinvestment strategies should be created for defined areas and areas experiencing disinvestment in an effort to transform these neighborhoods into Opportunity Areas. Planning efforts should focus on both the de-concentration and improvement of public and assisted housing and the housing and neighborhoods surrounding such developments.” (Rockford Metro, 2014, Pg. 139)

APA criteria for comprehensiveness identifies a comprehensive plan as covering traditional planning topics (e.g. land use or transportation) and emphasizing unique community needs (e.g. public health or workforce development). Only nine grantees out of twenty-six did not meet “basic” attainment status for plan consistency and comprehensiveness. Thirteen met “advanced” attainment status for this domain. The

Mississippi Gulf Coast demonstrates an “advanced” grantee for comprehensiveness. The plan covers a wide range of topics ranging from traditional planning issues, such as land use and infrastructure, to more locally- specific concerns, such as Gulf Coast food systems because of the importance of seafood to the local economy. The comprehensiveness of the Gulf Coast plan was aided by a structure that mirrored the comprehensive SCI “livability” principles (Gulf Coast, 2014) including:

1. Provide more transportation choices
2. Promote equitable, affordable housing
3. Enhance economic competitiveness
4. Support existing communities
5. Coordinate policies and leverage investment
6. Value communities and neighborhoods

Communications criteria included plan “persuasiveness” from the APA and integration of “equity framing” discussion in the plan (tying equity goals to regional economic health and well-being). Only eleven grantees did not meet communication criteria “basic” attainment status, and nine met “advanced” attainment status. The average communication criteria scores were both more than 2.0 (on a 0 to 3 scale) for “be persuasive in communicating the plan” (2.46) and “framing equity goals and objectives” (2.04).

The Des Moines grantee was a high- attainment grantee for the “persuasiveness” sub- criteria. The grantee emphasized personal stories and narratives throughout the plan,

for example, including the story of a returning ex-offender who detailed his struggle in finding employment after prison. Des Moines also featured “local stewards” who were local community members whose work exemplified the goals the plan was pursuing (Des Moines, 2014).

The Met Council, MN grantee excelled at utilizing the “equity frame” to communicate the importance of equity efforts and reduction of disparities. The Met Council projected out the potential economic impact in lost income, lost jobs and higher poverty, if existing racial and ethnic disparities continued unabated (Met Council, 2014).

The Mississippi Gulf Coast grantee took a unique approach in communication by creating a series of videos telling the story of the plan. One example is a video produced in Spanish with English subtitles that explains the changing demographics of the region, and highlighting the story of a Puerto Rican family that moved to the region because of the weather, beaches and schools and serves at a military base. The final plan is highly interactive including these videos, links to background documents, and available in multiple formats including Kindle, iBooks, and PDF (Gulf Coast, 2014).

4.2.8. Plan Analysis: External Criteria (Fair Housing)

Among all sub- domains, grantees scored lowest on meeting “external criteria” that consisted of fair housing obligations. Fair housing criteria were focused on referencing the protection for “protected classes” and the “affirmatively further” mandate impacting HUD

investments and entitlement communities. An additional external criterion was integration or the “bridge” of the FHEA into the comprehensive plan. The overall score for meeting external criteria for all grantees was 32%, nearly 40% lower than the standard to meet “basic” attainment status. Of the twenty-six grantee plans analyzed, only two (Rockford Metro IL and Puget Sound WA) scored higher than “basic” attainment status (Figure 18).

These grantees both received “advanced” attainment status scores (Figure 18). In the case of Puget Sound, the grantee tied a primary recommendation strategy to HUD fair housing obligations. Puget Sound’s “*Strategy 18: Implement Recommendations of the Fair Housing Equity Assessment*” clearly defined fair housing, identified the “affirmatively furthering” mandate for entitlement jurisdictions, and the need to ensure fair housing for protected classes:

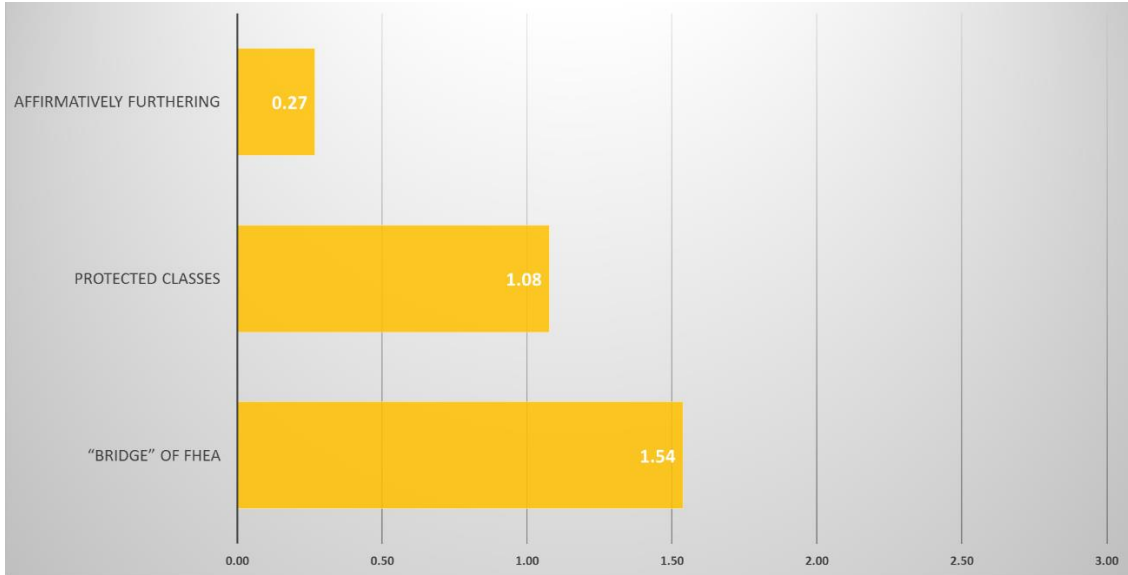
“Fair housing is housing that is available to anyone, regardless of race, color, religion, sex, family status, disability, or national origin, and free of barriers to housing choice in communities throughout the region. In order to foster compliance with the federal Fair Housing Act, communities receiving support from the U.S. Department of Housing and Urban Development (HUD) community planning and development programs are obligated to affirmatively further fair housing. This means identifying barriers to fair housing choice and carrying out action plans to overcome the effects of these impediments. The objective is to eliminate housing discrimination and provide opportunities for inclusive patterns of housing

occupancy. Communities must address fair housing for the “protected classes” listed above, and can choose to add in additional ones to this list and many corridor communities have chosen to do so. These policies need not be restricted to HUD-assisted communities, but should be focused in all transit station areas where diversity and inclusiveness are vital.” (Puget Sound, 2014, Page 39)

The grantee built upon identification of their fair housing obligations to introduce the FHEA, and integrated a detailed set of strategies from the FHEA. The FHEA recommendations focused on fair housing policy, enforcement, mobility strategies and zoning reforms.

The highest average score for external status for all grantees was for the “bridge of FHEA” criteria (directly referencing the FHEA outcomes in the plan). On the 0 to 3 score, the average score for this criteria was 1.54 (Figure 19). The average score for referencing the “affirmatively furthering” mandate for fair housing was the lowest of any sub- criteria (0.27 on the 0 to 3 scale). The score for referencing “protected classes” for the Fair Housing Act was 1.08 (on the 0 to 3 scale).

Figure 19: Average Score for External Fair Housing Criteria for All Grantees (0 = Lowest Score; 3 = Highest Score; N=26)

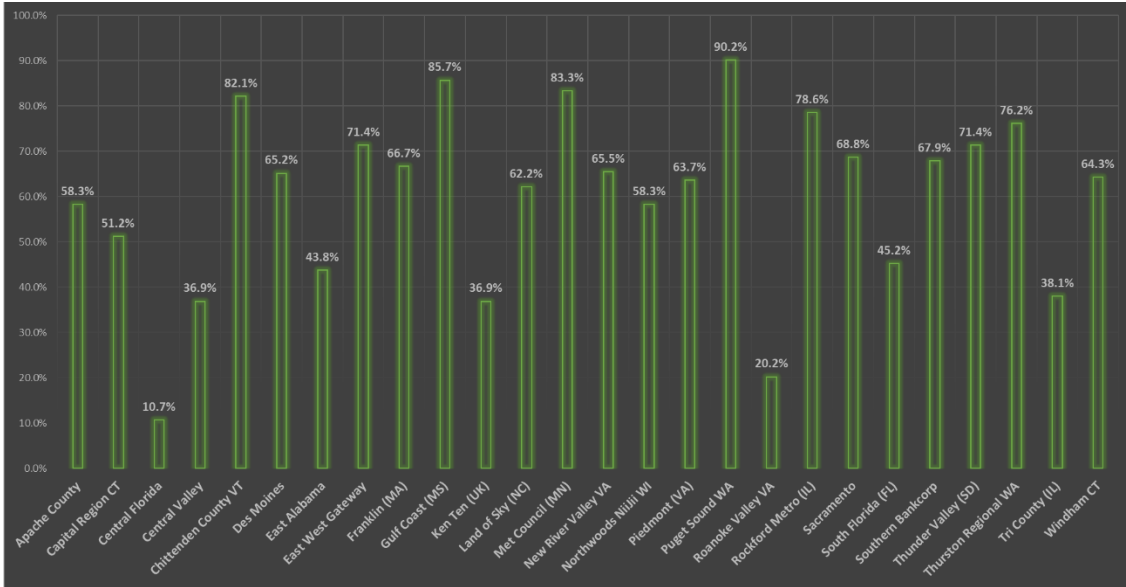


4.2.9. Plan Analysis: Overall Scores for Individual Grantees

As discussed earlier, the total average score for all grantees analyzed was 60.2%. The total scores for individual grantees ranged widely (Figure 20). The lowest scores were recorded for Central Florida (10.7%) and Roanoke Valley VA (20.2%). The highest score was earned by Puget Sound Regional Council in Washington (90.2%). In terms of the APA grading criteria, nineteen of twenty-six grantees scored lower than the standard for “basic” attainment status. Four grantees scored at “basic” attainment (East West Gateway, Rockford Metro IL, Thurston WA, and Thunder Valley SD). Three grantees met “medium” attainment including Gulf Coast MS, Met Council MN, and Chittenden County VT. Puget

Sound Regional Council was the only grantee to earn “advanced” attainment status according to the APA’s scale.

Figure 20: Comprehensive Score (% of total points earned by grantee)



Through plan review, several themes among high- performing grantees are quantitatively identified. Grantees who firmly bought into the SCI framework (illustrating they understood and valued the structure of the planning process, its goals and its principles) produced better plans. Grantees who “bought in” and also were high- capacity, with strong regional readiness, were more likely to excel. Local and national Capacity builders made a difference. Grantees who clearly utilized the skills of capacity builders produced better plans, and this was very evident with lower capacity grantees. Finally, those grantees who were heavily invested in robust and inclusive engagement generally

performed better in plan outcomes. High- performing regions within the plan analysis met either one or multiple of these characteristics identified above.

4.2.10. Plan Analysis: Discourse on Equity Issues

4.2.10.1. References to Poverty and Equity

Poverty references and discussions were common in the plans. Twelve plans contained more than ten substantive references to poverty (Figure 21). Only one plan (Thurston WA) did not reference poverty directly in the plan. References to equity were much more polarized. Some plans utilized and discussed the term “equity” extensively-- eight plans referenced equity ten or more times in plan discourse. Plans with more than ten references to equity included Southern Bankcorp AR, Sacramento CA, Franklin MA, Gulf Coast MS, Piedmont VA, Met Council MN, Chittenden County VT, and Puget Sound WA. In contrast, seven plans made no direct reference to the term “equity” in their discussion, and an additional three plans made only one reference to equity. “Poverty” was referenced more consistently than “equity” (Figure 21). In total, the median reference score for all plans in regards to poverty was eight and the median reference score for equity was five.

Figure 21: Plan References (# of references) to Poverty and Equity

| Region | Poverty | Equity |
|----------------------|------------|------------|
| East Alabama AL | 2 | 1 |
| Apache County AZ | 3 | 0 |
| Capital Region CT | 5 | 5 |
| Southern Bankcorp AK | 10 or more | 10 or more |
| Windham CT | 8 | 0 |
| Central Valley FL | 3 | 8 |
| Central Florida FL | 4 | 0 |
| Des Moines IA | 8 | 9 |
| Sacramento CA | 10 or more | 10 or more |
| Ken Ten KY/TN | 10 or more | 0 |
| Franklin MA | 10 or more | 10 or more |
| Tri County IL | 10 or more | 5 |
| East West Gateway MO | 10 or more | 7 |
| Rockford Metro IL | 10 or more | 0 |
| Gulf Coast MS | 7 | 10 or more |
| Piedmont VA | 3 | 10 or more |
| Land of Sky NC | 3 | 0 |
| Met Council MN | 10 or more | 10 or more |
| South Florida FL | 10 or more | 1 |
| Roanoke Valley VA | 3 | 1 |
| Chittenden County VT | 10 or more | 10 or more |
| New River Valley VA | 10 or more | 0 |
| Northwoods Nijii WI | 10 or more | 4 |
| Puget Sound WA | 2 | 10 or more |
| Thurston Regional WA | 0 | 7 |
| Thunder Valley SD | 5 | 2 |

4.2.10.2. References to Race and Ethnicity

References to racial or minority communities was common in many plans-- seven plans had 10 or more substantive references to “race” or “minority” and another three had more than eight references (Figure 22). The only communities to not directly reference “race” or “minority” included Southern Bankcorp (a predominately African American community), Central Valley CA, Central Florida, and Thunder Valley SD (a predominately tribal community).

Figure 22: Plan References (# of references) to Race and Ethnicity

| Region | Race/Minority | Black/African Am. | Latino/Hispanic | Asian | Tribal/Native |
|----------------------|---------------|-------------------|-----------------|-------|---------------|
| East Alabama AL | 2 | 1 | 0 | 0 | 0 |
| Apache County AZ | 1 | 0 | 0 | 0 | 10 or more |
| Capital Region CT | 5 | 2 | 3 | 0 | 0 |
| Southern Bankcorp AK | 0 | 0 | 0 | 0 | 0 |
| Windham CT | 1 | 1 | 2 | 2 | 5 |
| Central Valley FL | 0 | 0 | 0 | 0 | 0 |
| Central Florida FL | 0 | 0 | 1 | 1 | 0 |
| Des Moines IA | 4 | 1 | 2 | 0 | 0 |
| Sacramento CA | 4 | 3 | 10 or more | 5 | 4 |
| Ken Ten KY/TN | 10 or more | 4 | 1 | 0 | 0 |
| Franklin MA | 3 | 1 | 1 | 1 | 0 |
| Tri County IL | 10 or more | 6 | 5 | 6 | 1 |
| East West Gateway MO | 9 | 9 | 3 | 3 | 0 |
| Rockford Metro IL | 10 or more | 10 or more | 8 | 0 | 2 |
| Gulf Coast MS | 8 | 6 | 4 | 4 | 0 |
| Piedmont VA | 1 | 1 | 1 | 0 | 0 |
| Land of Sky NC | 2 | 1 | 3 | 0 | 1 |
| Met Council MN | 10 or more | 4 | 0 | 0 | 0 |
| South Florida FL | 10 or more | 7 | 7 | 5 | 3 |
| Roanoke Valley VA | 1 | 0 | 0 | 0 | 0 |
| Chittenden County VT | 10 or more | 4 | 5 | 4 | 0 |
| New River Valley VA | 3 | 0 | 0 | 0 | 0 |
| Northwoods Nijii WI | 9 | 0 | 0 | 0 | 10 or more |
| Puget Sound WA | 10 or more | 0 | 0 | 0 | 2 |
| Thurston Regional WA | 2 | 0 | 0 | 0 | 10 or more |
| Thunder Valley SD | 0 | 0 | 0 | 0 | 10 or more |

Race was discussed in simple descriptive terms (describing distributions of the population or population characteristics) in all plans referencing race, but some plans provided a much more substantive discussion about race in the region. Grantees who spoke substantively of race and ethnicity spoke of leveraging the region’s diversity as an asset. For example, the Capital Region CT grantee noted that the growth in the region was tied to racial and ethnic groups and identified the assets associated with the region’s diversity;

“The growth in minority population can be credited with providing overall population growth in the Capitol Region...Increasingly, people of different backgrounds are our neighbors and our coworkers. The diversity that these

individuals bring to our communities expands the range of foods, cultural events and experiences available to Capitol Region residents. This racial, ethnic and cultural diversity strengthens and enhances the rich fabric of our region.” (Capital Region, Pg. 15)

The FHEA guidance required grantees to extensively analyze patterns of segregation, housing need, and opportunity isolation for protected classes, including racial and ethnic populations. Given the racial and ethnic diversity of most regional grantees and the FHEA requirement, my expectation was that all grantees would have some discussion of racial and ethnic populations or racial and ethnic disparities in the final comprehensive plan.

Analysis of racial and ethnic populations in final comprehensive plans was not as robust across all grantees as I had anticipated. References to specific racial and ethnic populations varied widely among grantees (Figure 22). Ten grantees made no reference to “African American” or “Black” populations. Grantees with the highest number of references to “African American” or “Black” populations included Rockford Metro IL (more than 10), East West Gateway (9), and South Florida (7). References to “Latino” or “Hispanic” were not made in eleven grantee plans. “Latino” or “Hispanic” was most referenced primarily in Sacramento CA (more than 10), Rockford Metro IL (8), and South Florida (7). Seventeen grantees made no reference to “Asian” populations; the highest number of references to Asian populations was found in Tri County IL (6), Sacramento

CA (5), and South Florida FL (5). References to “Tribal” or “Native American” populations were primarily referenced by tribal grantees in regions with larger tribal populations. “Tribal” or “Native American” was referenced more than ten times in four grantee plans (Apache County AZ, Northwoods NiiJii WI, Thurston Regional WA, and Thunder Valley SD).

4.2.10.3. References to Equity Planning Terms

Among the equity planning terms referenced, the most common terms in plan discourse were “fair housing” and “inclusionary or inclusive” (Figure 23). The median number of references to “fair housing” among all twenty-six plans reviewed was 3, and the median for “inclusionary or inclusive” was 2.5. “Inclusionary” was mostly utilized to reference inclusionary housing strategies; “inclusive” was predominately utilized to reference the planning process and community engagement. “Mixed- income” and “FHEA” or “Fair Housing Equity Assessment” were not as frequently referenced in the twenty-six plans reviewed (Figure 23).

Figure 23: Plan References (# of references) to Fair Housing, Mixed Income, Inclusive/Inclusionary and FHEA

| Region | Fair Housing | Mixed Income | Inclusive/Inclusionary | FHEA |
|----------------------|--------------|--------------|------------------------|------|
| East Alabama AL | 2 | 2 | 0 | 0 |
| Apache County AZ | 1 | 0 | 0 | 3 |
| Capital Region CT | 5 | 3 | 0 | 0 |
| Southern Bankcorp AK | 0 | 0 | 0 | 0 |
| Windham CT | 6 | 1 | 2 | 1 |
| Central Valley FL | 0 | 0 | 0 | 0 |
| Central Florida FL | 0 | 0 | 0 | 0 |
| Des Moines IA | 10 or more | 0 | 3 | 0 |
| Sacramento CA | 1 | 0 | 5 | 0 |
| Ken Ten KY/TN | 10 or more | 0 | 0 | 1 |
| Franklin MA | 8 | 2 | 10 or more | 4 |
| Tri County IL | 10 or more | 0 | 4 | 0 |
| East West Gateway MO | 7 | 2 | 10 or more | 3 |
| Rockford Metro IL | 10 or more | 6 | 5 | 4 |
| Gulf Coast MS | 10 or more | 0 | 4 | 5 |
| Piedmont VA | 4 | 2 | 4 | 0 |
| Land of Sky NC | 2 | 2 | 3 | 0 |
| Met Council MN | 4 | 3 | 0 | 3 |
| South Florida FL | 1 | 1 | 5 | 0 |
| Roanoke Valley VA | 0 | 0 | 1 | 0 |
| Chittenden County VT | 6 | 0 | 10 or more | 3 |
| New River Valley VA | 0 | 0 | 0 | 0 |
| Northwoods Nijii WI | 0 | 0 | 0 | 0 |
| Puget Sound WA | 8 | 2 | 10 or more | 1 |
| Thurston Regional WA | 2 | 1 | 10 or more | 2 |
| Thunder Valley SD | 0 | 0 | 2 | 0 |

Chapter 5. Discussion

5.1. Reflecting on Research Questions

The following chapter reflects upon the initial research questions for this study discussed in Chapters 1 and 3, providing responses based on the analysis presented in Chapter 4.

Research Question: 1) Did the SCI's unique federal guidance (and equity mandate) promote the integration of social equity in regional sustainability plans and planning processes?

It is clear from the various sources of data analyzed for this research that the additional guidance, the FHEA mandate, and capacity-building assistance fostered an equity component to regional sustainability plans. The depth of the equity component in the planning processes and plan recommendations varied substantially among grantees within the 2010 cohort. Figure 24 presents performance groups or “performance cohorts” for SCI grantees. I grouped grantees based on their performance into four categories: Extending, Achieving, Developing, and Emerging. Figure 25 cross- references an identification of grantee capacity with performance cohorts.

Figure 24: Equity planning integration among SCI grantees (Performance Cohorts)

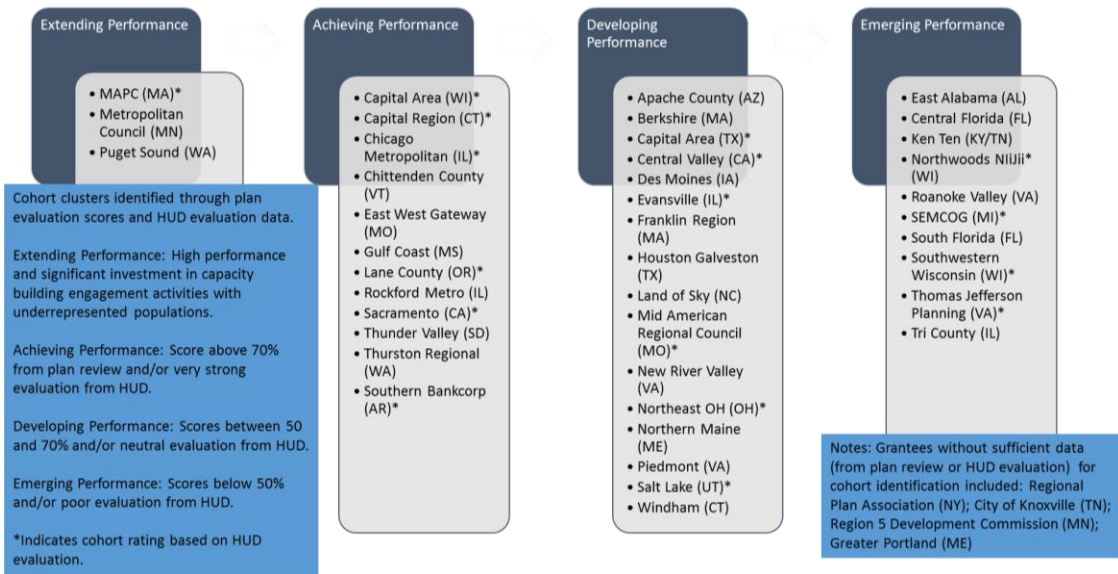
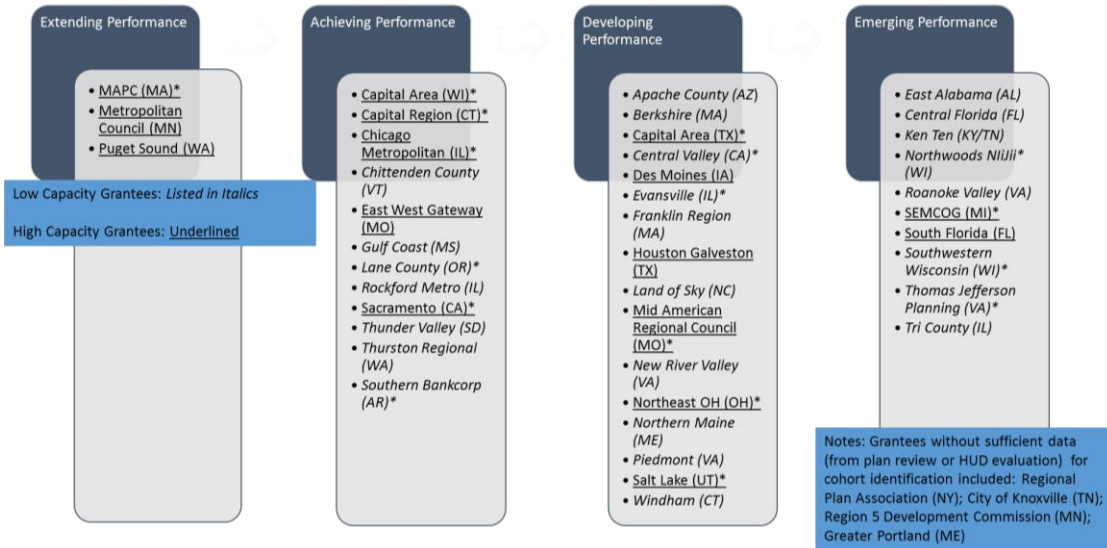


Figure 25: Performance cohorts and capacity (High or Low) of grantees



Grantees were grouped based on their plan evaluation results and HUD grantee evaluation data. Extending and Advanced grantees scored greater than 70% on plan evaluations or received very positive evaluations from HUD. “Extending” grantees are differentiated because of their substantial investment in leadership development or capacity-building for under-represented groups as part of their SCI planning efforts. “Developing” grantees scored between 50 and 70% on plan evaluations or received neutral (not overly positive, not overly negative) evaluations from HUD. “Emerging” grantees scored lower than 50% on plan evaluations or received negative evaluations from HUD. Four grantees were not grouped according to this methodology due to insufficient data.

Extending and Achieving grantees excelled, developing analysis and policy frameworks that were sophisticated and grounded in data, best practices and community input. These grantees represented 36% of 2010 grantees and had strong equity components to their plans, and were able to improve local capacity, readiness or the potential to engage equity issues. Thunder Valley SD, Mississippi Gulf Coast, and Chittenden County VT are illustrative of these regions. “Extending” grantees (Met Council, MAPC and PSRC) are differentiated due to their extremely robust equitable engagement efforts and leadership development or capacity-building activities. These were the only 2010 grantees who devoted substantial portions of their SCI funding to supporting community-based organizations and leadership development in under-represented areas.

Many grantees fell into the Developing category, producing moderate plan evaluation scores or neutral HUD evaluations. These grantees represented 39% of the 2010 cohort. For a smaller set of Emerging grantees, the equity component was missing or poorly developed, despite HUD assistance and requests to improve outcomes, and capacity builder guidance. These grantees represented 24% of the 2010 cohort, and included primarily smaller metropolitan areas or rural areas, with the exception of SEMCOG in Detroit.

Although plan analysis results illustrate modest outcomes (not meeting APA's standards or HUD's expectations) in the context of plan content for many grantees, even these modest outcomes are positive given the contextual factors of SCI, which were barriers to equity planning. These contextual factors include the following: the poor track record of sustainability planning to include equity; the poor relationships between marginalized groups and MPOs (who typically led the planning process); the lack of experience working on equity issues for MPOs (e.g. fair housing, community development); the relatively new nature of consortium relationships; the long historical nature of equity challenges (particularly those rooted in race); and the MPOs' lack of regional influence or power beyond transportation.

Research Question: Did equity planning become a clearer and more concrete concept, or did it remain a "fuzzy concept"?

The definition of equity planning also varied substantially among grantees. Some clearly articulated and conceptualized equity as a regional goal and the identification of

equity principles relevant to policy and practice. Eight of the twenty-six grantees reviewed in the plan analysis had ten or more explicit references to equity in the plan (Figure 21). Inclusive decision-making, fairness and reduction of disparities were common themes in defining equity, as described by the Capital Region plan for Connecticut:

“Equity — Sustainable development promotes equity between generations and among different groups in society. It recognizes the necessity of equality and fairness, and it reduces disparities in risks and access to benefits.” (Capital Region, 2014, Pg. 2)

The Mississippi Gulf Coast discussed the intersection of social equity and inclusive engagement efforts. The grantee also introduced geographic “access to opportunity” as an additional representation of social equity:

“Often forgotten, social equity can be represented by one’s access to opportunity defined as a “situation or condition that places individuals in a position to be more likely to succeed or excel.” Social, cultural, and physical characteristics of the environment profoundly influence a person’s access to opportunity. Opportunity has a geographic footprint in the Mississippi Gulf Coast, which highlights the inequities that exist among systems and structures across the region.” (Gulf Coast, 2014, Pg. 11)

The Arkansas grantee, Southern Bankcorp, clearly articulated the distinction between traditional economic development and equitable economic development practice. Equitable economic development efforts focused on building up existing assets and being “people” focused:

“Traditional economic development plans focus on attracting outside capital to a jurisdiction to create local jobs; however, to ensure more sustainable and equitable growth and opportunity, the economic growth strategies of the Economic Development Scenario emphasize opportunities to invest in local human capital and to maximize and build upon existing assets and entrepreneurial activity.”

(Southern Bankcorp, 2014, Pg. 25)

Puget Sound Regional Council defined social equity in the context of Transit Oriented Development (TOD) and “transit communities.” PSRC’s definition focused on accessibility of transit areas (through affordable housing) and provision of access to opportunity structures:

“Equitable transit communities are mixed-use, transit-served neighborhoods that provide housing and transportation choices and greater social and economic opportunity for current and future residents. Although generally defined by a half-mile walking distance around high-capacity transit stations, they exist within the context of larger neighborhoods with existing residents and businesses. These communities promote local community and economic development by providing

housing types at a range of densities and affordability levels, commercial and retail spaces, community services, and other amenities that are integrated into safe, walkable neighborhoods. Successful equitable transit communities are created through inclusive planning and decision-making processes, resulting in development outcomes that accommodate future residential and employment growth, increase opportunity and mobility for existing communities, and enhance public health for socially and economically diverse populations.” (Puget Sound, 2014, Pg. 5)

Recognition of historical injustices and discriminatory policy was another element of social equity articulated in some plans. Chittenden County VT, linked equity planning as an approach to “*correct past injustices*” (Chittenden County, 2014, Pg. 7). The Capital Region in Connecticut discussed the role of exclusionary housing and development policies in shaping equity issues today:

“Historic placement of subsidized housing, redlining, restrictive covenants and exclusionary zoning, zoning that has the effect of keeping out of a community or neighborhood certain groups or in some cases, additional population of any kind, are all aspects of the region’s history that have contributed to the extent of racial segregation that still exists today.” (Capital Region, 2014, Pg. 143)

Tribal grantees also often referenced historical injustices, particularly those committed by the federal government, in their equity discussions. SCI was presented as a

historically unprecedented attempt by the federal government to atone for past transgressions. The language of the Apache County/Northeast Arizona plan captures this sentiment:

“The lives of all of the people of Apache and Navajo Counties count. But for too many years, the decisions affecting the lives of these people did not consider them. They were left on their own. Yes, they have the same desires for life, liberty and the pursuit of happiness. But there is power in numbers. And the numbers favor nearly everyone else. Then, along comes a program carefully designed to reach out to the traditionally marginalized. The United States government, a government that has a history of marginalizing Native Americans, was advancing a program that asks: How can we help you?” (Apache County, 2014, Pg. 10)

While a cluster of grantees did well on defining equity, for others this discussion was poorly articulated-- ten of the twenty-six grantees included in the plan analysis made only one or no explicit references to equity in the plan (Figure 24). For many of these grantees, equity concerns (such as disparities), and equity strategies (such as affordable housing or meeting the needs of marginalized groups) were more likely to be articulated around discussions of poverty (Figure 24). As illustrated by the East Alabama grantee, the only attention paid to marginalized groups was in discussing the plan as a poverty reduction strategy:

“As a planning consideration for the Clear Plan, the East Alabama Region should strive to increase educational and employment opportunities throughout the region in order to alleviate poverty situations.” (East Alabama, 2014, Pg. 36)

New River Valley, which included no explicit substantive discussion of equity in the plan, spoke of equity issues or concerns through the lens of poverty and health. The plan utilized the goal of supporting healthy communities to integrate the needs of social vulnerability and potentially marginalized populations:

“A healthy community extends well beyond adequately caring for those who are sick. A healthy community supports healthy choices and lifestyles, and proactively addresses health problems such as teen pregnancy, substance abuse and disease. Healthy communities also attend to the needs of those who are most vulnerable – people in poverty, babies and young children, the elderly and people with disabilities - making sure that all residents have the ability to live up to their potential.” (New River Valley, 2014, Pg. 19)

The variations in definitions of equity are not surprising given that HUD did not provide an explicit definition of equity. The Fair Housing Equity Assessment provided many benchmarks and metrics to analyze equity issues, but did not define equity explicitly. Capacity builders assisted in supplementing this lack of clarity, but it was left to the regions to interpret a definition of equity, which they did with more or less success.

Research Question: How did the SCI regional planning grantees incorporate equity concerns into regional plans and planning processes?

A review of the top equity strategies included in plans reviewed for the plan analysis demonstrates consistent themes in how equity strategies were integrated into the plans. The most consistent finding was an intense focus on equitable and inclusive engagement among most grantees. Numerous grantees expressed the role of inclusive engagement as a key element to incorporating equity into the planning process. The Gulf Coast plan demonstrates this consistent theme:

“Social equity was a cornerstone of the planning structure, and the Public Engagement Plan defined specific strategies to reach marginalized populations for involvement in the planning process.” (Gulf Coast, 2014, Pg. 6)

The Thunder Valley SD grantee described the engagement and deliberation aspects of SCI as a natural extension of Lakota culture and traditional decision-making:

“Listening is an important value shared by many of us on the Pine Ridge Reservation. It requires not just respectful silence but the ability to be open to what is being said. The work in our Oglala Lakota Plan is a re-telling of what was said by elders, youth, and everyone in-between. Including as many voices as possible helped us to provide a well-rounded set of recommendations and also is important to fueling necessary changes.” (Thunder Valley, 2014, Pg. 39)

The most common representations of inclusive engagement identified in plan analysis was meeting criteria of “seeking diverse participation” and “engaging stakeholders in all stages of the planning process” (Figure 20). The least common form of inclusive engagement activity were integration of efforts to “promote leadership development in the planning process in disadvantaged communities.” (Figure 16) The integration of inclusive engagement may have been directly influenced by direction from HUD (the original NOFA for the program emphasized engagement with under-represented groups), and the extensive capacity builder assistance provided to grantees to ensure inclusive engagement strategies. This inclusive engagement also helped to shape equity strategies. As an example, the Mississippi Gulf Coast developed a priority to create a grocery shuttle as a response to a focus group with people who are homeless who described the significant challenges with accessing affordable food (Gulf Coast, 2014, page 146).

The analysis of plan evaluation criteria for equity strategies provides insight into how equity was represented in planning strategies or recommendations. The primary equity strategies identified in plan analysis were related to housing, infrastructure, workforce development, and community reinvestment. The criterion for “providing a range of housing types” was the highest scoring criteria in plans. This criterion was followed closely by “plan for jobs/housing balance” and “upgrade infrastructure in older substandard areas” (Figure 15). The identification of affordable housing and infrastructure as the top elements for planning are not surprising given the influence of Fair Housing Equity Assessment (which was the most defined set of standards for SCI grantees), and the natural fit between

metropolitan planning agencies (MPOs) and infrastructure planning, particularly transportation infrastructure. The least- referenced equity plan criterion was “protecting vulnerable populations from natural hazards.”

Additional qualitative themes emerged in plan evaluation. Larger metropolitan regions such as MAPC, Met Council, Puget Sound, the Regional Plan Association, and the Capital Region focused on equity concerns (primarily risk of gentrification) in the context of transit-oriented development (TOD). Health was also a common theme in grantee plans, both focusing on health care but also social determinants of health impacting communities.

Tribal grantees placed a heavy emphasis on asset- based community development, looking internally to cultivate tribal assets and other internal resources for development. Asset- based community development emphasizes immediate action and self-empowerment of communities; it is intended to catalyze and inspire communities who have long been marginalized. The tenants of asset- based community development are evident in the language of the Thunder Valley regional plan for Pine Ridge reservation:

“How long are you going to let other people decide the future for your children, are you not warriors? It’s time to stop talking and start doing. A long time ago when our ancestors rode into battle they didn’t know what the outcome was going to be but they did it because they knew it was in the best interest of the children and people. Don’t operate from a place of fear, operate from a place of hope, anything

is possible but you need to take action, the movement is here, the time is now.”

(Thunder Valley, 2014, Pg. 25)

Research Question: Did regional equity goals translate into actionable policy recommendations?

Generally, plan evaluation scores were high for identification of equity strategies in plans. While the depth of actionable policy recommendations varied by grantees, grantees had actionable recommendations, particularly in the context of housing. The only exception to this would be outcomes for many of the “Emerging” performing grantees. As a cohort, the 2010 grantees scored, on average, 66% of all total points on “equity strategies” criteria, the third highest score among sub- criteria in plan evaluation. As an example, the Gulf Coast MS plan has an actionable recommendation to “Establish a Regional Housing Coalition” as a way to continue the collaboration between housing and housing-related service organizations.

While recommendations were evident in most plans, serious questions remain regarding implementation. Post- planning implementation varied widely, with most devoting scarce attention to implementation discussions. Most of the policy solutions presented required some aspect of regional implementation; unfortunately, the vast majority of grantees performed poorly on “responsible regionalism” criteria in plan reviews. These criteria included “regional resource sharing” and ‘regional housing plan coordination.” As a group, the 2010 cohort scores only 52% of total points available for

these criteria (the 2nd lowest sub- criteria score overall). Without a cohesive regional framework for implementation, many of the recommendations presented will be challenging.

Additionally, only a handful of grantees provided detailed suggestions on funding sources for recommendations. In contrast, four grantees Windham CT, Gulf Coast MS, Met Council MN and Puget Sound WA, provided extremely detailed implementation frameworks and responsible parties for implementation, and funding sources.

In part, this variation in approach to implementation is a result of limited direction and expectations from HUD about implementation. While the four grantees provided substantial detail on implementation, the participating consortium members have limited authority to implement the recommendations. Future research should focus on post-planning outcomes for all grantees to see the extent of implementation and whether there is a contrast between grantees with high implementation details versus those without implementation details.

Research Questions: How persuasive and communicative were equity planning components of regional sustainability plans quality? How was implicit communication and “framing” incorporated into equity components of the plan?

Research has demonstrated the benefit of framing equity concerns in the context of economic prosperity, choice and opportunity to counter resistance to equity issues.

PolicyLink, the primary social equity capacity builder, provided extensive capacity-building assistance in communicating the relationship between equity and economic prosperity. Their “equity as a superior growth model” framework and their engagement assistance were cited in multiple plans and grantee reports. While some grantees struggled in defining the concept of equity (e.g. fairness in policy and practice), most were able to adequately frame and communicate the importance of equity concerns (particularly disparities, segregation, housing need and poverty challenges).

Equity concerns (the issues identified above) were framed consistently in plans and generally communicated strongly. The cohort of grantees reviewed in the plan evaluation scored, on average, 75% of total points for the communication criteria, the second highest sub- category score among all plan sub- topic criteria (Figure 17). Grantees focused on communicating the relationship between equity and personal empowerment, choice, and economic development were the most consistent frames. The examples below provide illustrations of the common types of discourse used to justify attending to equity needs.

The relationship between economic competitiveness and equity was a clear focus for many grantees. The language used by the Mid-American Regional Commission in Kansas City built economic competitiveness into their definition of equity:

“EQUITY: Residents of all races, economic means and abilities are welcome and equipped to participate in all aspects of community life. A region is most likely to be sustainable, and nationally and globally competitive, if all its residents are

active participants in its economy, community and public life.” (MARC, 2014, Pg. 2)

South Florida communicated the importance of equity issues for the innovation-based, competitive 21st century economy:

“Given the diversity of the region, improving competitiveness will require a continued focus on education and innovation, and at the same time an environment that provides the tools for all residents in Southeast Florida to prosper, have access to affordable housing and jobs, an increased educational attainment, and a chance at leadership and participation in the decision-making process.” (South Florida, 2014, Pg. 32)

The Windham CT grantee emphasized the impacts of housing disparities on the economic well-being of families and the broader the community:

“The regional economy cannot thrive when too large a portion of household income is consumed by housing and transportation, leaving insufficient resources for childcare, education, recreation, health care, and other expenses. Equal access and choice in housing is directly related to educational and economic opportunity. Housing and neighborhood conditions impact health and a range of other outcomes including educational achievement.” (Windham Region, 2013, Pg. 4)

The Capital Region CT grantee focused directly on the impacts of segregation and isolation for communities of color and education outcomes:

“This increasing income disparity and isolation of poverty have serious implications for our region. Academic research has documented a strong correlation between school performance such as test scores, drop-out rates and other measures of achievement to the level of poverty in those schools. This research suggests that when we segregate students by race and income, the concentrated poverty that results in some schools limits students’ ability to compete for good jobs or higher education. This presents a challenge for the Capitol Region in which minority population is highly concentrated in our urban core and inner ring of suburbs.” (Capital Region, 2014, Pg. 20)

The Piedmont region grantee communicated the potential labor force challenges if existing economic disparities were to continue:

“In the United States the gap between rich and poor is growing wider, and significantly higher numbers of blacks and Latinos live in poverty. The same trend is evident in the Piedmont Triad. What will this mean for our region’s economy if this trend continues? What do these trends mean to our ability to host a prepared workforce that is attractive to businesses? What do these trends mean to our ability to produce world-class innovative thinkers that are needed to grow our economic

resilience and prosperity? What can be done to fix the deeply ingrained problems that are the root cause of these trends?” (Piedmont, 2014, Pg. 3)

The Met Council in Minneapolis-St. Paul expanded this argument further, quantitatively projecting out the implications of ongoing racial disparities and their impact on the region:

“By 2040, 43 percent of the population will be people of color, compared to 24 percent in 2010. If today’s disparities by race and ethnicity continue, our region would likely have 151,000 fewer people with jobs, 228,000 fewer homeowners, and 305,000 more people in poverty compared to what could happen with the gaps addressed.” (Met Council, 2014, Pg. 3)

Research Questions: 2) Was the HUD- mandated Fair Housing Equity Assessment (FHEA) effective in advancing equity in the SCI planning process?

The more concrete guidance provided by the FHEA (and the capacity-building assistance to support it) advanced the depth of equity analysis in SCI, particularly in the context of affordable housing and fair housing. Grantee reports, HUD reports, and case studies support this finding. In some regards, the lack of standardization between regional comprehensive plans, in comparison to the more standardized FHEAs, demonstrate the influence of this guidance. But, it was a resource- intensive activity, and was not a panacea for resolving conflict. Its relevance for implementation is questionable in some grantee

regions. Additionally, numerous rural grantees struggled with the FHEA model, which was designed for more urban metropolitan regions. Numerous rural grantees noted that the FHEA analysis did not fit the characteristics of their community, where poverty may be more dispersed, or where small towns are the primary centers of opportunity. As described by the Ken-Ten grantee in Eastern Kentucky and Tennessee:

“In conclusion, there are only a few communities where it appears that an inordinately high incidence of poverty and a relatively large (proportionately not in absolute numbers) concentration of minority persons (in this case, African Americans) converge in one community. These include Fulton County (although total numbers are relatively low in this rural county), Tiptonville, Union City, and to a lesser degree, Martin. But as described above, these latter two communities represent the greatest concentration of opportunity for those persons in poverty, and thus it may be beneficial, rather than a roadblock, to have such a concentration.” (Ken-Ten, 2014, Pg. 15)

Research Question: Did the outcomes of the FHEA translate (or “bridge”) to the outcomes of the final regional plans?

The research finds mixed results for the cohort of SCI grantees in regards to integration of the FHEA into their plan. Among all external plan review criteria, the FHEA mandate had the highest average score for grantee points given for external criteria for plan evaluation purposes (Figure 19).

The other external criteria pertaining to the Fair Housing Act, discussion of protected classes, and discussion of the affirmatively furthering requirement were referenced far less. Yet, fifteen of the twenty-six grantees reviewed in plan evaluation made no reference to the FHEA in their plan. When extenuating circumstances are considered, the number of grantees not referencing the FHEA shrinks to eleven (42%). Two of the grantees who did not reference the FHEA were tribal grantees (Thunder Valley and Northwoods Nijii). Not referencing the FHEA was not unusual in this context, as tribal entities were not mandated to produce an FHEA. Another two grantees produced the more rigorous RAI (regional analysis of impediments), and referenced those in place of the FHEA. Case studies of FHEA- production among rural grantees also support mixed results with integration into the final planning.

While the FHEA was not referenced directly in many of the plans, the strength of the fair housing and affordable housing component of plans suggests that many aspects of the FHEA findings did emerge in the plan, even if the FHEA was not directly referenced. Only five (19%) grantees (excluding tribal grantees) did not reference fair housing in their plan. The majority of grantees (19) referenced fair housing in the plans. Five grantees also made more than ten references to fair housing in the content of the plans.

Research Questions: Is the FHEA an effective tool for advancing the Affirmatively Furthering Fair Housing mandate of HUD? What are the implications for the AFFH rule from the experience of implementing the FHEA?

The FHEA framework has been integrated into HUD's revision to the Affirmatively Furthering Fair Housing (AFFH) rule announced in 2013 and implemented in 2016; thus, entitlement communities across the nation will need to follow a process similar to the FHEA. The experience from the FHEA process in the SCI program provides tremendous insight to the potential strengths and limitations of the revised AFFH rule.

The FHEA represents the continued evolution of fair housing thought and rigor to aid HUD in meeting its duty to "affirmatively further fair housing." The assessment integrates new ideas for fair housing analysis, bringing in recognition of areas of concentrated poverty and the geography of opportunity, while also expanding upon existing concepts such as regional fair share. The FHEA is an effective analytical framework that can build public will, and improve outcomes for equity.

SCI grantees routinely acknowledged the benefit of the FHEA process in engaging equity discussions and raising attention to equity issues in the grantee regions. The data analysis was useful for better understanding equity issues in the region and supporting the need for equity planning. These benefits derived during the SCI process are promising indicators of the utility of the FHEA framework.

But the FHEA also has limitations as a planning and fair housing tool. These limitations may re-surface as the entitlement communities attempt to meet the new AFFH requirement. SCI grantees identified the FHEA process as labor- and resource- intensive. Grantees leaned heavily on capacity builders to assist in FHEA development. The

conditions that made the FHEA successful also raise concerns about what would have happened without the capacity builder assistance and resources provided by SCI. Grantees also struggled in transitioning the detailed data analysis from the FHEA into policy actions and recommendations.

The revised AFFH will be a much better tool than the traditional analysis included in most traditional Assessments of Impediments (AI's) for fair housing. But, its utility will primarily be seen for those that "buy in" to the new framework. As SCI illustrated, those communities that produced strong and robust FHEAs found them to be very useful in supporting equity planning efforts and fair housing, while those that did not had poorly-developed equity recommendations.

The revised AFFH will have limitations for many entitlement communities. The AFFH will be more rigid than the FHEA because of its adherence to the limitations of focusing on protected classes enumerated in the Fair Housing Act, defined as race, color, religion, sex, handicap, familial status, and national origin. The FHEA was a broader "fair housing and equity assessment" than the AFFH, thus communities could engage equity issues and marginalized communities more broadly. Many high- need populations are not protected classes under the Federal Fair Housing Act, and grantees were able to focus on the unique needs of low-income populations who were not protected classes. For example, the New River Valley grantee focused on the needs of populations struggling with addiction.

The FHEA was resource- intensive, which raises substantial concern regarding how entitlement communities resource the process for AFFH compliance. Grantees estimated FHEAs could cost up to \$100,000 to complete, and the process was time- consuming. SCI grantees had the benefit of HUD grant funding for their FHEA. How will entitlement communities approach this resource and time constraint without additional funds from HUD? Will funds need to be diverted from other aspects of community development block grant budgets? Will the AFFH add additional strain to the resource limitations of entitlement communities?

The FHEA was most useful when utilized for a regional analysis-- the design of the analytical metrics for the FHEA and AFFH (such as regional dissimilarity scores and analysis of geographic areas of opportunity) are most relevant at the regional level. However, entitlement communities have no obligation to pursue a regional assessment process. Without an obligation, what is the incentive to support regional coordination?

HUD is encouraging grantees to pursue regionalization of assessments, and two incentives have been identified for grantees to consider this approach. Entitlement communities can save resources through collaboration, spreading the cost of assessment among multiple communities. And, entitlement communities who collaborate on regional plans also can gain extended time for completing and submitting their consolidated plans to HUD. Will these incentives be enough to encourage regional collaboration without additional financial resources? Those communities who are not entitlement jurisdictions

within regions have no requirement mandating their participation in the new process. Therefore, regions who may be significant contributors to regional patterns of housing segregation (through exclusionary zoning or other barriers to fair housing) have no obligation to take part in the assessment process.

Finally, HUD historically has not had a strong track record of AFFH enforcement. It is unclear if the agency will have the will or resources to thoroughly review or reject AFFH analysis and plans. The engagement process of the AFFH is supposed to build political support and influence political will to move the AFFH from an analysis to a plan to implementation. For this to occur, significant resources will be needed to conduct the extensive community engagement and leadership- building needed to create an equity “voice” to push for the AFFH assessment and, ultimately, implementation. These challenges are surmountable but will require resources, capacity-building and more research. The FHEA and SCI experience provide guidance to improve the implementation of the AFFH process, but more resources and research are needed.

5.2. Sustainability as a Framework for Equity

Sustainability has had a poor track record of engaging issues of social equity in U.S. planning practice. SCI demonstrated that sustainability can be a strong framework to engage issues of equity, but guidance and external incentive is needed to ensure this happens. Addressing equity through sustainability is not something that comes easily or naturally (given the context of the challenges in approaching equity in the U.S), nor is there

necessarily the capacity for many planning organizations to embrace equity without robust guidance.

As discussed in the findings, the overall cohort of SCI grantees had moderate outcomes for supporting equity in their plans, although the disparity in outcomes between grantees was substantial. These moderate outcomes were aided by the addition of HUD support, capacity builder support, and substantial HUD guidance for the FHEA requirement.

As many grantees expressed, the equity conversation was challenging and often fraught with conflict. All of the capacity-building resources were necessary to push along the difficult equity dialogue within grantee regions. It is challenging to imagine the SCI program producing the same equity outcomes without the addition of these capacity builders or under the guidance of another federal agency (such as EPA or DOT).

Equity efforts within sustainability are challenging because of the history of structural racism in the United States. SCI illustrated the United States' distinct political culture and the difficulty in remedying our long and conflicted history of racial and ethnic discrimination. The politicization of equity policies was also evident in the conservative and Tea Party resistance to SCI. Race has been a "wedge" issue utilized in political context throughout history, and has been particularly powerful in driving a wedge between groups and undermining solidarity in attempts to bolster labor and address class divides. Since the Nixon Administration's "southern strategy," race has played a substantial role in building

support for conservative causes, parties and political candidates. The political organizing against SCI should be interpreted through this political history.

Scholarship and historical evidence supports the argument that localism (the antithesis of regionalism) was a reaction to provide distance from the racialized “other” and to counter desegregation efforts. The concept of “White flight” to suburban enclaves was fueled by this desire to be separate from “the other.” Equity planning efforts will require significant time and energy to break down the development patterns, and policy or institutional structures created by nearly a century of pro-segregation values. Consequently, embracing equity (particularly racial equity) in the context of sustainability in the U.S. will require effort, intentionality and persistence. As experienced with SCI, these barriers are often too much for local agencies to surmount without resources, guidance, and sometimes regulatory pressure.

These challenges are exemplified by the experience of Southeast Michigan Council of Governments (SEMCOG), a grantee who received one of the worst evaluations of any grantees, and the only major metropolitan region to receive a “fair” rating in its HUD evaluation. The critique of SEMCOG is aided by additional contextual details about the conflicted history of SEMCOG in supporting equity in the Detroit region.

As one of the most racially segregated regions in the nation, Detroit has a complex and challenging history. Multiple race riots, a legacy of housing discrimination and resistance to integration has plagued Southeast Michigan (Sugrue, 2005). SEMCOG has

played a critical role in this complex history. Legal scholarship has identified the agency as an example of structural racism in planning practice, because of the agency's disengagement with urban communities and communities of color, and loyalty to Detroit's predominately White suburbs. These White suburbs were forged by the White flight from Detroit and are traditionally hostile to the needs of Detroit and Wayne County. These same suburban jurisdictions drive the SEMCOG board, creating a political disincentive for the agency to advocate for the equity needs of Southeast Michigan's largest city.

Civil Rights advocates sued SEMCOG in 2004 for its imbalanced political structure (Schneider, 2004). In Gary Benjamin's *SEMCOG's Business As Usual: A Failed Model*, the author documents the repeated resistance of SEMCOG to supporting racial equity concerns, particularly in respect to transportation and housing in the region (Benjamin, 2011). The author notes that the imbalanced political structure of SEMCOG was created and continues to support the racialized White flight and sprawl which has dominated the region:

“Not surprisingly, the governing structure of the Southeast Michigan Council of Government (SEMCOG), as it arises out of our regional racial history, is ill-equipped to deal with the problems presented by a region where the us versus them mentality is such a strong force. The decisions made on a regular basis by SEMCOG are made through a governance structure that reflects our regional racial history. Specifically, SEMCOG's governance structure is one that relies on

municipal units to participate using a “one government, one vote” philosophy. This philosophy is in itself unjust because many of the participating municipalities were created, or grew larger, because of racism.” (Benjamin, 2011, Pg. 156)

Given the structural and political challenges to support equity in Southeast Michigan and SEMCOG’s poor history, it is not surprising the grantee performed poorly. In the end, HUD’s efforts to improve the outcomes of SEMCOG (and all grantees) had limitations, as expressed in the final evaluation of SEMCOG:

“Although HUD never intended regional consortiums to be subservient to an MPO board or any other governmental or quasi-governmental entity, HUD’s efforts to resolve this situation were fruitless. At the end of the day, SEMCOG’s initiative was largely a top down, staff- and MPO-driven effort with little significant public input or engagement.” (HUD, Southeast Michigan, 2014)

Chapter 6. Implication and Conclusion

6.1. SCI: From Grand Vision to Complicated Reality

The inception of SCI would come at a time of economic and social crisis in the United States. As discussed in Chapter 1, SCI was launched with a grand vision and high expectations. SCI was a program forged quickly in a time of crisis within a new Presidential administration; SCI's implementation would present a more complicated reality.

Several immediate challenges would hamper the program's implementation. Guidance for SCI was initially vague and grantees were often frustrated with lack of clarity in implementation guidance and direction. HUD had to address capacity challenges with grantees. Some grantees did not have the organizational capacity or technical expertise to implement a complex and multi-faceted program such as SCI. Organized Tea Party resistance would challenge community engagement activities in some grantee regions. Many grantees also struggled with the complexity of addressing deep structural and societal inequalities impacting inequity in their regions.

Despite these many challenges, multiple sources of data indicate that equity planning efforts did improve in most SCI regions. More importantly, the SCI planning process

fostered dialogue, engaged under-represented communities, and built capacity to further equity goals in the regions. Given the inherent challenges and tensions in addressing racial and social equity in our nation, and the historical difficulties in promoting equity in sustainability planning, these positive outcomes should be applauded. SCI had many flaws in its design and implementation, but resilient grantees and HUD pushed the program forward toward many successful outcomes.

The SCI experience presents implications for planning theory, policy and practice. More specifically, this research has implications in respect to the role of HUD in equity planning and furthering our understanding of approaching equity planning in a diversifying 21st century America.

6.2. Policy Implications: The Federal Role in Equity Planning

SCI was catalytic in some regions and provided an example of what federal leadership can do to facilitate strong regional action. SCI demonstrates the potential for federal support to foster capacity-building to produce better planning outcomes in smaller regions, rural regions and tribal nations. SCI also illustrates the challenges in federal engagement, primarily consistency, interagency collaboration, prolonged commitment, and definition of roles.

Federal Support Producing Transformational Changes for Leading Grantees:

Several grantees clearly highlight a level of commitment to equity issues and engagement not seen in the rest of the cohort. For the largest of these regions, MAPC (Boston), PSRC (Seattle-Tacoma) and Metro Council (Minneapolis-St. Paul), the increased focus on robust engagement and equity was identified as transformational. HUD regularly utilized these grantees as cohort “leaders” to assist with peer- to- peer learning across the larger community of grantees.

Metropolitan Area Planning Council (Boston)-

The Metropolitan Area Planning Council (MAPC) is the regional planning agency for the Boston region. MAPC’s planning efforts emphasized planning and implementation activities for TOD areas, highlighting two recent affordable housing developments near Jamaica Plain and Fields Corner. MAPC did extensive work focusing on addressing affordable housing near gentrifying areas, documenting affordable housing needs, strengthening the “no snob” law in MA, working with cities to strengthen inclusionary housing measures, and advocating regionalized housing planning. MAPC’s engagement activities were also extremely intensive, particularly the emphasis on inclusive engagement models. As described by MAPC in their final narrative report:

“When developing projects, a lot of thought was given to figuring out how to engage groups that are traditionally under-represented in planning processes...Our steering committee always stressed the importance of reaching all stakeholders, especially people of color, low-income residents, small business

owners, and people with disabilities. Through the leadership of MAPC's Community Engagement Specialists and from our partners with existing relationships, we were able to design innovative and effective approaches for engaging all stakeholders." (Metropolitan Area, Narrative Report, 2014)

The consortium held 362 planning meetings involving 10,000 participants, 52 training and education sessions, engaging an additional 12,000 stakeholders. Local planning demonstration projects funded by the agency dedicated 30 to 50% of their budgets to community engagement. The consortium provided extensive documentation of the leadership development supported through engagement efforts.

MAPC's planning experience was described as creating institutionalized reforms in regards to approaches to engagement in the region and equity planning in the organization:

"The state of planning practice has advanced as a result of the HUD grant. We developed a scope template that requires managers to outline how projects will build-in inclusive engagement, advancing equity, and clear expected outcomes...In many ways, this focus on equity is also transforming MAPC. Our governing board endorsed the State of Equity Policy Agenda, which includes recommended actions on a range of issues that have not historically been in MAPC's wheelhouse (e.g. income inequality and youth jobs). We now include a discussion of equity and engagement in all scoping documents. And we are evaluating our projects on their

outcomes, including the extent to which equity goals were advanced. As we move forward, we intend to continue working with our allies on these issues – through policy and legislative work, as well as through place-based project work.”
(Metropolitan Area, Narrative Report, 2014)

Metropolitan Council (Twin Cities)-

The Metropolitan Council grantee was the only grantee to commission an official evaluation of its SCI planning process, engaging the University of Minnesota to conduct the evaluation. Met Council’s evaluation identified many outcomes from the SCI process, such as the development of pilot projects moving toward implementation around TOD. Additional impacts also included support for small businesses impacting TOD, affordable housing development near TOD sites, and new capacity for engagement with under-represented groups. The potential impact of the Met Council plan’s on equity considerations in the region is significant. The implementation of the plan is projected to create or preserve 500 affordable housing units along the new transit corridor, and generate \$18 million in contracts to minority contractors (Metropolitan Council, Narrative Report, 2014).

Additionally, the evaluation identified the increased capacity among consortium members as an example of impact. This capacity includes heightened technical skills among community organizations, stronger relationships between engineers and planners,

better alignment of funding among partners, and new knowledge development among stakeholders (Metropolitan Council, Narrative Report, 2014).

The Met Council's substantial commitment to equitable community engagement set it apart from most SCI grantees. As described in the final narrative report, the equity focus of the planning process required a robust strategy of community engagement:

“As equity began to emerge as a key outcome for the Thrive MSP 2040 plan, a related theme traveled with it: to achieve equitable outcomes and foster equity in this region, the Council must ensure the full range of voices participate in regional decision-making.” (Metropolitan Council, Narrative Report, 2014)

The consortium granted out \$720,000 of HUD grant funds to 19 community organizations, who led community engagement activities. Engagement activities directly communicated to 40,000 people, 12,000 people attended meetings and 250 stakeholders went through leadership training. For example, sub- grantees hired 12 local community organizers to engage East Side communities around pending transit development (Metropolitan Council, Narrative Report, 2014). The community engagement efforts directly impacted the planning process and planning decisions, as described by the Met Council:

“Direct outcomes from specific community engagement grants include changes in some plans that will have a high likelihood of making a difference to low-income

and under-represented groups, e.g. a potentially re-located station area in Eden Prairie, changes to Blake Road station to improve low-income community's access, planning on the Gateway Corridor that will include a more comprehensive perspective on low-income residents' transit needs and options, and the inclusion of an elevator in downtown Saint Paul to make a station accessible to users with disabilities.” (Metropolitan Council, Narrative Report, 2014)

The Met Council noted that the process worked to align stakeholders on a regional vision of equity and economic competitiveness, and to embrace new planning models:

“Along with the increased regional focus on development in corridors has come an equally elevated focus on the equity of that development. The number of organizations and cross-sector initiatives working on equity has extended well beyond COO and its successor initiative PRO. Though COO cannot claim to have caused the attention among all the other groups, it has helped to bring them into alignment....Strengthening the impact is the fact that these changes are operating hand- in- hand with an increase in regional thinking and hence the regional scale of application of these principles, by a coordinated partnership of regional organizations and leaders who are in support of each other's efforts.” (Metropolitan Council, Narrative Report, 2014)

Projects post- completion have transitioned from “corridors to opportunity” to “partnership for opportunity” and ongoing efforts utilizing other local funding sources. The

Met Council reported that the institutionalization of the SCI process planning principles by partner organizations substantially increases the likelihood of long- term implementation:

“The holistic view of development that has been championed by COO and adopted by so many partners is seen by many of the stakeholders as holding a high promise for improving the well-being of low-income residents of the region. The extent to which this vision of development has been adopted by a wide assortment of organizations, and has been institutionalized in the regional plan and in changes to some important funding streams, suggests a high likelihood that this vision will be sustainable even in case of changes in the economy or in elections.”

(Metropolitan Council, Narrative Report, 2014)

Puget Sound Regional Council (Seattle/Tacoma)-

Similar to MAPC and the Metropolitan Council, Puget Sound Regional Council’s (PSRC) SCI planning process heavily emphasized equity concerns and community engagement. PSRC reported substantial equity outcomes from its planning process. These outcomes included new affordable housing support activities, community capacity-building efforts and intensive community engagement. Additionally, an equity network was developed for the region as part of the SCI process. I assisted PSRC with their opportunity mapping analysis as part of the SCI process, and the grantee was one of the first to incorporate opportunity mapping into TOD planning, utilizing data tools to assess gentrification risk and community development needs. This substantial analysis was started

by PSRC, before HUD announced the FHEA. In many ways PSRC was a leader in the types of equity analysis HUD attempted to require all grantees to conduct.

PSRC awarded significant sub-contractor grants to community-based organizations to support community engagement. Community engagement and local leadership development was a primary goal of the SCI process. As described by PSRC in their narrative report:

“Meaningful community engagement and local leadership in planning and decision-making was recognized as a core component of the Growing Transit Communities work program. To support this, the Community Equity Grant Program provided small grants to nonprofit organizations located or working with the three transit corridors in Central Puget Sound...Grants to community-based organizations provided resources to organize and increase participation of under-represented communities to shape the future of transit station areas and surrounding neighborhoods.” (Puget Sound, Narrative Report, 2014)

More than a half million dollars in SCI funds were dedicated to these engagement capacity-building support grants, which reached dozens of communities across the region. A total of \$450,000 was awarded in 54 capacity-building grants given to 43 community-based organizations in the region. An additional \$125,000 was given to nonprofit organizations who assisted in building the capacity of community-based organizations.

PSRC documented the compelling activities and experiences generated by these various activities, as described by the grantee:

“These projects represent a wide variety of compelling stories, from organizing East African immigrant women for the first time to provide them a voice in local planning and decision-making, to increasing the participation of Tacoma youth from under-served communities in public processes.” (Puget Sound, Narrative Report, 2014)

HUD Investment as Catalytic for Change:

Top performing SCI grantees all noted that the emphasis on social equity and engagement made a lasting impact on organizations, with institutionalized reforms occurring as a byproduct of the SCI planning process. In the case of these grantees, the federal investment for SCI was catalytic and the relationship- building and policy or institutional reforms these grantees experienced may not have happened without SCI. These particular communities illustrate the value of federal investment in regions to be transformative leaders, building models of practice for other communities to emulate.

Readiness, regulatory environments and political climate also play a role in the potential success of federal investment in equity planning or regional planning efforts. It should be noted that these three regions are also very high- capacity regions, with more sympathetic policy infrastructure than many places across the nation. For example,

Massachusetts' anti-snob (affordable housing) laws have been in place for more than four decades, and the MPO already assists in coordinating Home consortiums in the Greater Boston area. The Metropolitan Council in the Twin Cities region is one of the most empowered regional metropolitan planning organizations in the nation; the Met Council holds more regulatory clout and influence than most regional planning entities can exercise (with the exception of Portland, OR's MPO). The region also has a long history of regional revenue-sharing and inclusionary zoning. Puget Sound also benefits from a more equity planning-friendly environment, including strong growth management policies, with inclusionary zoning already being utilized in the region. Additionally, all three regions are located within areas with a more progressive political climate.

HUD: Challenges in Administration and Political Conflict

Challenges arose as HUD took on a more active role in funding and implementing regional sustainability planning. The agency had little experience in issues of sustainable development prior to SCI. The agency itself had staff capacity challenges in overseeing and playing a direct role in so many complex regional planning processes across the nation.

HUD, like any large federal agency, has challenges of internal coordination, most importantly with how field offices and other divisions (such as the Office of Fair Housing and Equal Opportunity, FHEO) engaged with SCI grantees. For example, the Northeast Ohio grantee attempted a Regional AI (the more advanced and enhanced iteration of the Fair Housing Equity Assessment). Grantees were encouraged to perform this more robust

assessment, which could then be used to meet entitlement community regulatory obligations. HUD SCI field staff supported and encouraged all grantees to consider the RAI. The Northeast Ohio RAI was completed, but the final document had to be approved by the FHEO regional office. In this case, the Columbus regional office did not approve the document, thus eliminating the possibility for the incentive that HUD SCI field staff were encouraging the grantee to pursue (HUD, Northeast Ohio Evaluation, 2014).

Additionally, policy models, such as SCI and FHEA were so new, and launched so quickly that clear guidance could not be easily provided. SCI was policy-making in real time. As ideas transitioned to action, unexpected challenges and undefined guidelines would foster innovation but would also undermine consistency in the SCI process. HUD also had to play multiple roles in the SCI process, acting as a funder, but also a capacity builder, and occasionally a regulator. As a highly visible Obama Administration initiative with tremendous expectations, field staff had to both promote the planning process and support the grantees, and also attempt to regulate the quality of the planning processes and reports.

SCI also illustrated the conflict between the agency and a conservative Congress. When HUD attempted to become more proactive and engaged, both in SCI and with the recently enacted AFFH rule revision, Congress has continually challenged the agency. Efforts by the Tea Party and other conservative groups to lobby Congress for limiting SCI were apparent in the early years of the program. Bills were put forth in the U.S. Congress

to defund the program and to limit the ability of agencies within the federal partnership to collaborate. Congress's apprehension toward SCI (and many other Obama Administration programs) undermined any efforts to raise additional Congressional support to expand funding for SCI. At the state level, there were attempts with bills introduced to prevent states from accepting federal funding for sustainability initiatives and to stop the state from pursuing sustainability. For example, in Mississippi a statewide organization Stop Agenda 21 claims that "regionalism removes power from municipalities and states and the people to a minimal number of people who feel they are equipped to make the necessary decisions." (Stop Agenda 21 in Mississippi, 2016)

Post-SCI HUD: Commitment to Grantees and Continued Political Challenges

The lack of support from Congress eventually undermined HUD's ability to support its SCI grantees and meet the expectations raised of grantees in the planning process. As described in the analysis of grantee narrative reports, at the end of the SCI process, grantees expressed frustration that additional HUD funding was not forthcoming. This concern was fueled by expectations created by HUD field staff, that the "Preferred Sustainability" status provided to SCI grantees would be a major incentive for competitive federal funding opportunities. The Notice of Funding Availability stated:

"All applicants achieving a specified threshold score in their submission for the 2010 round of the Sustainable Communities Regional Planning Grant Program will qualify for Preferred Sustainability Status, which signifies that the region is ready

to advance planning that prioritizes sustainability and inclusion as core outcomes of community development. Applicants that meet this criterion will qualify for a broad spectrum of benefits, including access to capacity-building resources, and secure potential points in a number of funding opportunities managed by other federal agencies such as HUD, DOT, and EPA.” (HUD, 2010)

Grantees believed the federal partnership (DOT/EPA/HUD) would utilize the SCI plans for agency funding decisions in the regions after the plans were completed. Currently, it is unclear what impact “Preferred Sustainability Status” will have on any future funding decisions. At this time, no additional regional SCI implementation funding, which had been implied to grantees, has been provided by the agency. While many grantees are pursuing implementation resources independently, this lack of promised support does create the potential for an opportunity lost, if the capacity built and the momentum for plans developed within regions is stifled by lack of resources.

The AFFH represents the continued movement toward a more proactive and engaged HUD after the SCI experience. But the political sensitivity and debate in the U.S. Congress about AFFH, even with the rule’s relatively modest scope, illustrates the continuing political challenges to HUD. Political advocacy against the AFFH from conservative activist groups has plagued the new rule for some time. Conservative critiques of the new rule have framed the rule as another example of federal intrusion and overreach.

Even though the rule cannot force any local land use policy changes, conservative critiques have stated that the rule would override local zoning.

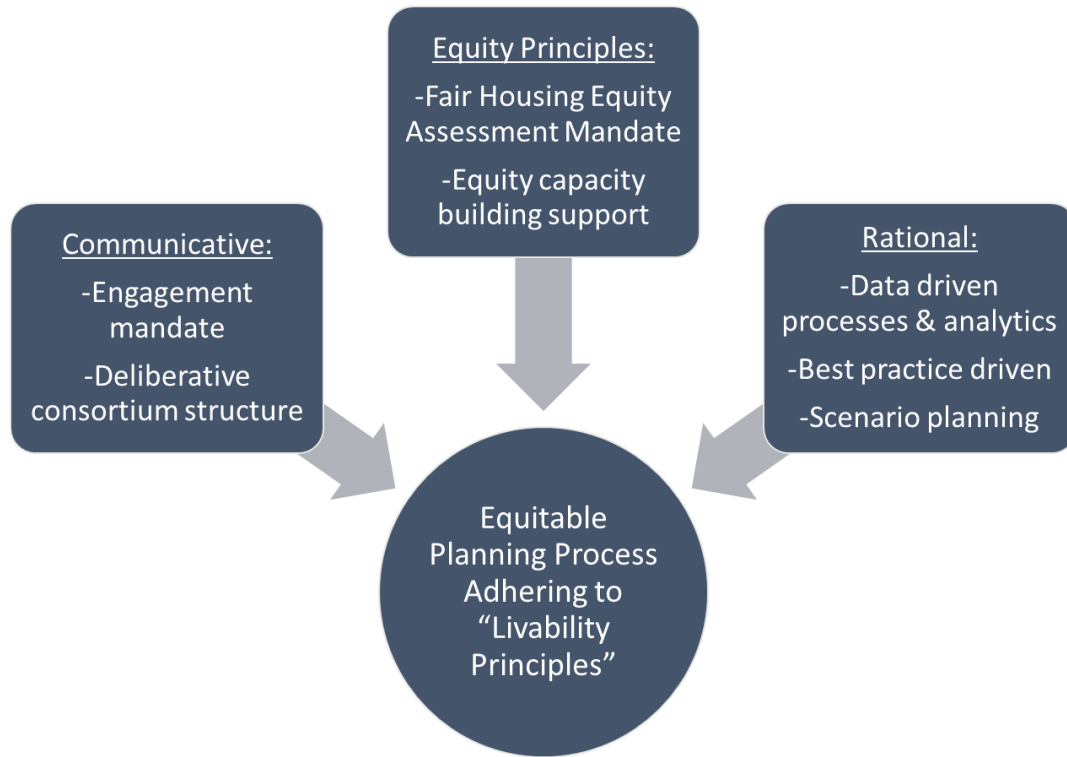
This unfounded concern became such an issue that a Congressional effort to effectively kill the revised AFFH rule occurred in May of 2016. Republicans in the House put forth legislation to defund implementation of the AFFH, citing the fear of HUD infringing on local land use authority. Although this concern was not a legitimate possibility given the existing limitations on HUD, the measure passed the House of Representatives and was debated on the Senate floor. The effort was stopped when a countering compromise measure, put forth by Senator Snow of Maine, provided funding for AFFH and clearly stated that HUD cannot use the rule to override local land use regulations. Senator Snow noted in her Senate remarks that the fear of HUD over- turning local land use control was not warranted.

If HUD is to stay more proactive and engaged in equity planning efforts, particularly efforts to strengthen fair housing among entitlement communities, these political conflicts and retaliations should be expected to continue. Time will tell if the next presidential administration entering office in 2017 will continue the agency along this path, or if HUD will once again undergo a period of transition and a change in policy direction. Based on the agency's history, we can anticipate any future attempt to further HUD's reach, influence and impact will be countered by the conservative movement and office holders.

6.3. Research Implications: The Limitations of Communicative Rational Planning for Complex Regional Plans

The SCI model of producing regional comprehensive plans and even the Fair Housing Equity Assessment can fall short when viewed simply as a communicative rational planning activity. Both Communicative Planning and Rational Planning are beneficial models, but SCI exposed the limitations with Communicative Rational Planning in addressing complex regional planning processes. The structure of the initial design for SCI (and even the Fair Housing Equity Assessment) adhered to a Communicative Rational Planning model--intensive analysis and data would produce a road map of strategies and decisions for the region's growth. Data and analysis would be conjoined with consortium deliberation and intensive community engagement. Advocacy or equity planning also was evident in the process, via the HUD equity mandate (the FHEA) and significant equity capacity-building assistance. In the end, the model for SCI was a Communicative Rational approach (Figure 26). The regional plan (or the FHEA) would be the articulation of this dialogue, analysis and recommendations, and foster implementation. But transitioning from the plan content to implementation is where this equitable Communicative Rational approach falls short.

Figure 26: The theoretical framework for SCI



The Communicative Rational Planning Model can be beneficial in developing regional sustainability plans that are equitable, complex, multi-sector and multi-partner. The communicative aspect of SCI was also essential to the equity component of the regional planning process. The power of dialogue and engagement built a foundation for better outcomes and empowerment. Engagement and deliberation with under-represented and marginalized groups was a foundational element of SCI. Most grantees leveraged these engagements to build better institution-community relationships. The intense (rational) analytics of the FHEA and other analytical components of the regional plans were helpful in providing a base of knowledge to inform and help “make the case” for equity solutions.

Equity issues such as fair housing or environment justice are harder to attack as top down federal, state or regional intrusion when there is a strong foundation of community voices calling for them and data justifying them.

The Communicative Rational approach falls short in fostering implementation. Viewing cities and regions as complex systems means having the ability to influence change among multiple stakeholders, with minimal authority. The Piedmont grantee articulated this complexity in their discussion of implementation:

“However, no single investment or isolated strategy will fully address the economic, social and environmental challenges we face. Our best road to inclusive prosperity requires multiple local and regional actions meeting both local and regional interests. Successful implementation of the many strategies proposed by Piedmont Together will require audacious leadership that is willing to take calculated risks and pursue new, transformative approaches. This will require collaboration amongst local and regional planning agencies, and engagement with community and private sector leaders.”

(Piedmont, 2014, Pg. 2)

Most of our regional planning infrastructure across the U.S. is not structured in a way to provide impact through the equitable Communicative Rational planning approach. Outside of developing the Transportation Improvement Plan, most metropolitan planning organizations (MPOs) have limited authority. MPOs act as a facilitator, convening some regional stakeholders (primarily local governments), and provider of data and analysis.

Fostering regional change in this setting of fractured local governance and weak regional governance is challenging, and change within this context is more likely to be incremental and organic.

The research also demonstrates limitations to plan evaluation methods utilizing the American Planning Association's plan evaluation criteria (Sustaining Places: Best Practices for Comprehensive Plans), for reviewing these complex regional plans. APA's plan evaluation criteria is grounded in a rational planning perspective, in which plans are judged solely based on their demonstration of analysis and content. The Communicative Rational model of SCI should be suitable for evaluation with this evaluation tool, based on a rational planning foundation (and including measures of communicative planning).

The plan evaluation criteria provide some insight into the elements of the plans represented, but this "check the box" approach to evaluation misses much of the critical context of SCI planning efforts. Thus, a rational plan evaluation method alone would have not sufficiently analyzed the SCI experience with accuracy.

For example, the East West Gateway grantee, the MPO for the St. Louis region, produced a well-constructed plan with very strong equity outcomes in the strategies identified. For the plan evaluation analysis of equity strategies, the grantee was one of four who scored "advanced" in their plan's strategies identified. Despite the strength of the plan, the grantee has no real authority to implement many aspects of the plan.

The East West Gateway Council represents eight counties in two states, and within those eight counties are hundreds of local governments who have significant autonomy and control of land use and development policies. The St. Louis region is the third most politically fragmented region among major metropolitan areas in the nation (Hendrick and Shi, 2015), and St. Louis County alone has 150 local governments. Given the lack of authority and the extreme fragmentation of the region's decision makers, the ability for the East West Gateway Council to effectively implement its regional plan will be challenging.

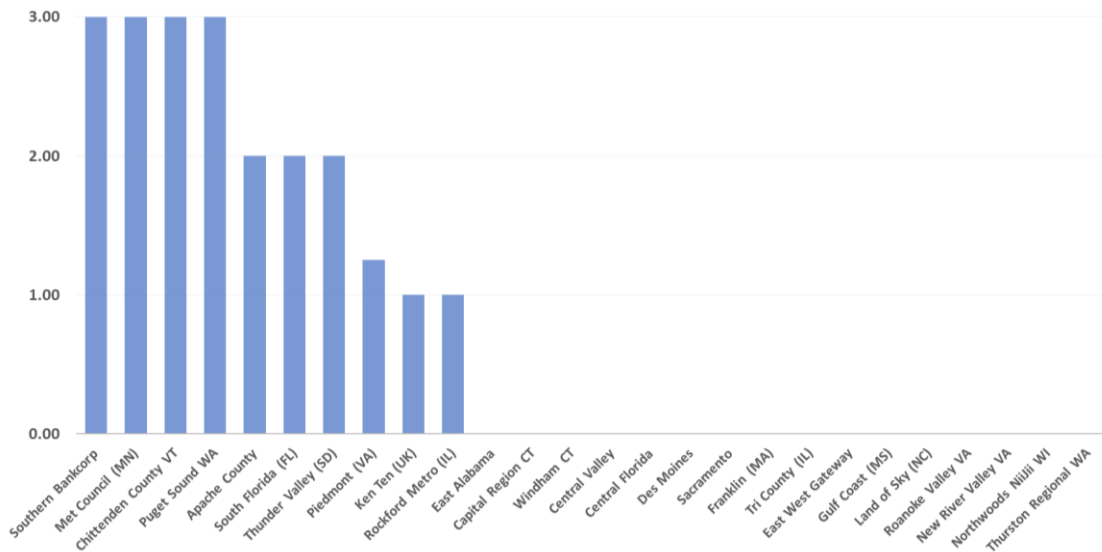
Even in describing the function of the Council, the MPO notes its principal role is communicative and that it works to “set the table for cooperative planning and problem-solving” (East West Gateway Council, 2016). This concern and apprehension was acknowledged in HUD's evaluation of the Council, as described by HUD field staff “the results of the planning process can only do so much” (HUD, East West Gateway Evaluation, 2014). This is a challenge not limited to one grantee, but experienced to some degree in all of the regions working on comprehensive sustainability plans.

Plan evaluation criteria also treat all planning activities and outcomes as equally valuable, which is questionable. For example, APA criteria utilize a number of community engagement measures, ranging from “communicate through a variety of channels” to “promoting leadership development in disadvantaged community in the planning process.” These two different activities are viewed and graded equally, even though the latter

(leadership development) is much more resource- and skill- intensive and should lead to deeper impact.

In the SCI example, a handful of regions supported leadership development efforts (Figure 27), and only three regions invested significant funds into leadership development efforts (MAPC, Met Council and Puget Sound). These grantees were some of the most successful in their community engagement processes (and were recognized by HUD for their efforts), yet from the perspective of the plan evaluation criteria, these resource-intensive and impactful activities were viewed the same as all other engagement criteria.

Figure 27: Grantee scores (0 to 3) for engagement criteria (Promote leadership development in disadvantaged communities during the planning process)



The normative evaluation criteria can also inadvertently undercut the value of engagement. For example, equitable engagement processes were supposed to shape areas of focus for the regional SCI plans. A region could adhere strongly to the input from marginalized or under-represented communities, which would be a positive outcome, but would be penalized through the plan evaluation criteria method if their areas of intervention do not match APA's criteria.

6.4. Research Implications: Addressing Deficiencies in Communicative Regional Planning by Integrating Collective Impact Theory

Theoretical constructs and models of social change from external fields or disciplines can bring insight into understanding programs, such as SCI, that do not adhere neatly to existing theoretical frameworks in planning. In this case, Collective Impact Theory provides a better model for approaching the complex SCI regional planning implementation. The Model of Collective Impact is a theory and social change model that better suits the structure and potential of the SCI approach.

Collective Impact Theory is a relatively new theory developed for social policy and to address “deeply entrenched and complex social problems” (Collaboration for Impact, 2016). The first scholarship for Collective Impact Theory emerged in 2011 and quickly caught the attention of philanthropy and policy makers (Bernholz, 2011 and White House Council, 2012). Collective impact is focused on collaboration and coordination, but differs from traditional collaboration in that it requires the development of organizational

infrastructure to push along collective efforts in a strategic way (Collaboration for Impact, 2016).

Collective Impact Theory's five key elements of collective impact work include: development of a common agenda; utilization of data-based benchmarks for accountability; an action plan that produces mutually-reinforcing activities between stakeholders; ongoing communication between stakeholders; and the development of a backbone organization that is resourced to serve the collective impact effort and stakeholders (Kania and Kramer, 2011). Collective impact efforts have traditionally focused on social policy issues, such as education or poverty reduction, but now have expanded to aspects of community development and issues such as homelessness.

The Sustainable Communities Initiative: Collective Impact in Practice published by the U.S. Federal Reserve, was the first recognition of SCI as a collective impact model (Marsh, 2014). Author Dwayne Marsh notes that the activities of the Federal Partnership for Sustainable Communities “mirrors the growing movement toward collective impact strategies.” (Marsh, 2014) The article notes the role of collective impact efforts within grantee regions among stakeholders, but also the unique role of the federal government as an additional collective impact partner.

In the context of SCI, it is easy in retrospect to see some of the five elements of collective impact. The regional plan acted as the vision for collective impact efforts, data benchmarks were encouraged for grantees (and mandated in the case of the FHEA), and

the consortium provided the mechanism for constant communication and trust- building, while the lead grantee (usually the MPO) acted as the backbone organization.

Marsh posits that the SCI grantees who followed collective impact practices were the most likely to succeed in their planning processes:

“Early evidence points to three key determinants of grantee success as communities and regions put their plans into motion....cross-sector partnerships are core to nearly every grantee – they are the only way that grantees can develop solutions to match the complexity of the issues facing local communities...those who developed governance structures that capitalized on the power inherent in collective strategy development and discourse are now poised to move into action with significant implementation momentum.” (Marsh, 2014, Pg. 36)

“Cross- sector partnership” are the heart of collective impact models. The “governance structure” noted as the third determinant of success is referencing the use of the collective impact infrastructure model. Collective impact infrastructure always includes a backbone organization, which provides infrastructure for convening, engaging and implementing collective strategies. This ongoing infrastructure allows collective impacts to transition into strategies, and visions among multiple stakeholders into incremental implementation.

Unfortunately, it should be noted that the recognition above regarding collective impact was made after the planning process was completed. Also, grantees were not given direct guidance on embracing collective impact models and approaches from the federal government. In hindsight, grantee plans are calling for a collective impact solution in many of their implementation discussions, such as the articulation of a need for “new methods” and “new decision-making tables” as described by Chittenden County, VT:

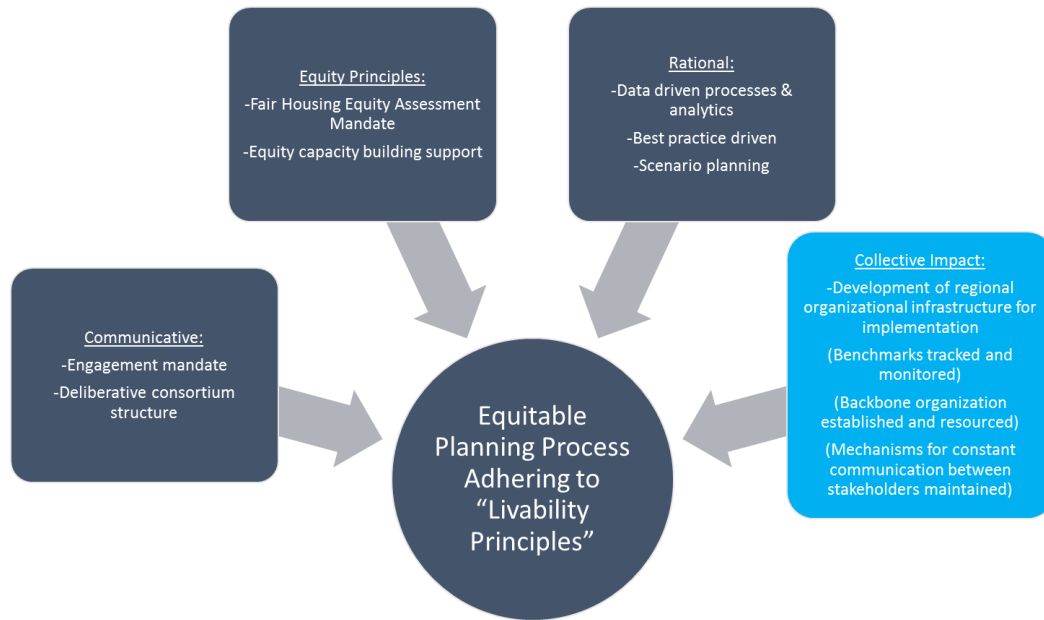
“Ensuring equity so that all residents can access and take advantage of the region’s economic, social, and environmental assets requires new networks of relationships, new problem-solving methods, and new, inclusive decision-making tables...New tools need to be created by a diverse group of equity stakeholders in order to ensure meaningful community engagement, identification and tracking of disparities, and decision-making that weighs the burden placed on different groups. By bringing together diverse and disparate interests while developing new leaders, ECOS projects can be the seeds for an equitable, prosperous and healthy future for Chittenden County.” (Chittenden County, 2013, Pg. 109)

If this framework had been identified prior to the planning processes and capacity-building support and guidance provided to grantees, it could have potentially assisted grantees in developing a cohesive infrastructure for plan implementation. Additionally, HUD provided funding for the planning process, but no resources for plan implementation. Thus, the critical “infrastructure” to support collective impact implementation (post- vision

development) was not supported financially by HUD. Ultimately, this guidance and resources for post- planning implementation may have strengthened outcomes and the potential for implementation by grantees.

The SCI experience demonstrates the utility of the collective impact model, particularly in the context of complex regional sustainability planning. The inter-connected and multi-sector issues being addressed through SCI required intensive coordination and collaboration among multiple stakeholders. While community development practice is just beginning to embrace collective impact models, planning theory has not integrated this emerging model. The experience from SCI provides an opportunity to illustrate how to incorporate collective impact into planning theory and practice, and to provide a model to address the complex implementation challenges faced by communities and regions (Figure 28).

Figure 28: The proposed modified theoretical framework for the SCI
 (Addition of collective impact approach)



6.5. Research Implication: Leveraging Socioeconomic Challenges as a Point of Transformative Change

Our nation is facing two powerful external factors at this time, climate change and significant demographic shifts (growing diversity and growing inequality). SCI grantees focused intently on these issues, as SCI plans reflected these changes consistently in their vision and purpose. These factors were routinely presented both as a call for change (a challenge to the status quo), and as an opportunity to engage and consider new practices and visions for the future.

Grantees presented growing diversity as an opportunity and a challenge. Grantees reflected upon the entrepreneurial spirit and energy brought by immigrants, while also raising concerns about ensuring planning efforts reflect these new communities and calling for efforts to support community cohesion. Grantees regularly raised the implications of growing poverty and growing inequality in their respective regions, illustrating the long-term consequences of these trends in preparing the future labor force and economic prosperity. These factors were provided as evidence to support the region acting and planning differently, more specifically making the case for supporting equity planning efforts.

Equity planning efforts have historically been catalyzed by challenge or crisis. The deplorable conditions of the tenements catalyzed the work of urban reformers in the late 19th and early 20th century. The Great Depression fostered the inception of public housing and federal promotion of home ownership during the New Deal. The race riots of the 1960's and the social pressure, or as Dr. King described social "tension" produced through the Civil Rights movements, were responsible for Civil Rights laws and the inception of the advocacy planning movement. Even the SCI program was a response to crisis, an Obama Administration effort triggered by the economic recession and housing crisis.

Does SCI provide an example of leveraging another point of societal challenge or looming crisis to bring renewed energy to equity planning? The demographic and economic shifts presented by SCI grantees are not unique or specific to just their regions.

America is rapidly diversifying and also experiencing a growth in income inequality, persistent poverty, enhanced racial disparities, and lower social mobility. More specifically, we see growing marginalization of a larger segment of our nation's population, particularly among youth, who represent our future labor force and leaders.

Could this current socioeconomic challenge (or potential crisis) offer a transformational moment for the planning profession? More importantly, should the planning profession be more focused on these issues, not only to "make the case for equity" but to better understand societal changes that can significantly impact the sustainability of our cities? I argue that SCI provides both an example of the demographic and economic issues that will reshape our cities and society, but also provides an example of how these concerns can be leveraged to mobilize change.

6.6. Conclusion: Reflecting on the SCI Experience, Advocacy Planning and Future Research

The SCI was a unique, well-resourced experiment for the planning field, in which the federal government played a more robust role in supporting sustainable and equitable development. The SCI experience provides insight into planning theory, policy and practice, particularly in sharpening our understanding of equity planning. The program demonstrated that a more proactive federal role by HUD is not without complication, but can be beneficial.

HUD efforts with SCI supported an innovative pilot program, demonstrating that federal funds can be catalytic in regions with adequate readiness (such as Boston, Minneapolis-St. Paul and Seattle), and to build capacity in regions with limited resources and limited collaboration (such as Pine Ridge Reservation). Additionally, the enhanced attentiveness to equity illustrated that with an equity “mandate” or support, sustainability can be a framework that adequately embraces equity planning. HUD can also play a role in meeting its nearly half century- old obligation to “affirmatively further fair housing” by playing a more proactive role in ensuring equity issues are integrated into local planning efforts.

SCI was not without its challenges; wavering federal commitment and unmet expectations will hinder capitalizing upon the plans and limit implementation. More importantly, not having a solid theoretical model to approach implementation for these complex multi-sector and multi-faceted regional plans will make implementation challenging. But, it is not too late for regions to seek to develop the appropriate infrastructure needed to advance the momentum of the SCI process, and as seen among some more successful grantees, implementation infrastructure and outcomes can be achieved without federal support.

The equity planning efforts from SCI also exemplify the complexity of equity planning in a diversifying United States. U.S. equity concerns vary significantly across our nation and even within regions or communities. Equity challenges are diverse due to

differences in geography, population, economic conditions and local culture, as demonstrated by SCI grantees.

“Hot market” metropolitan regions, such as Seattle, Austin, and Boston, focused primarily on challenges created by gentrification (displacement and affordable housing), while also attempting to ensure more economic benefits are reaching marginalized groups. “Weak market” metropolitan regions, such as St. Louis or Northeast Ohio, were attempting to stem the continued disinvestment in urban areas, while also supporting regional fair housing solutions to provide access to opportunity in suburban areas.

Rural communities ranging from Appalachia, to the Mississippi Delta or the Central Valley of California, sought to strengthen rural economies, support human development, and bring investment back to struggling small towns and cities. Tribal areas looked internally to understand how to best leverage tribal community assets to bring opportunity to reservation lands and counter intergenerational poverty. Meanwhile, across the nation, regions sought to better understand the needs of new immigrant populations and foster equitable community engagement.

Given the wide variation in issues facing marginalized communities across the U.S., SCI demonstrated that both “procedural” and “practice-” based equity planning solutions are important. SCI also provides an additional example of how “framing” equity concerns can dismantle resistance to equity outcomes. SCI exemplifies the benefits of robust and equitable community engagement and the importance of social capital in

planning, both between communities and institutions, and also between institutional stakeholders.

Finally, SCI illustrated the continuing challenges we have regarding issues of race and class in our cities and regions. These long- standing challenges will not be resolved easily without continued attention to equity concerns. A century of robust pro-segregation policies and practices in urban development and real estate created our contemporary geography of opportunity and inequality. Untying this “Gordian knot” and remedying these historical injustices will require evolving models, persistence, and integration of equity as a foundational element of planning policy and practice going forward.

Research Moving Forward:

SCI presents many possibilities for future research. Based on this initial research, I have identified the following areas of inquiry, which will require additional research and scholarship moving forward:

- My research focused on the 2010 cohort of SCI grantees, additional research to focus on the 2011 cohort will enrich understanding of the SCI experience. Future research will compare plan evaluation outcomes for the 2010 cohort and 2011 cohort.
- Future research should also explore more objective sources of community data on the SCI process. This research focused on perspectives from funders and grantees,

but future research should explore others impacted by or loosely connected to planning processes. In particular, focused case studies exploring the perspective of equity advocates and other stakeholders within regions with SCI regional planning grants may uncover a diversity in perspectives on the SCI process and outcomes.

- Many SCI grantees embraced very innovative solutions in approaching equity planning and fostering equitable community engagement. These innovations, such as Puget Sound's transit area typology or the Met Council's investment in local leadership development, need to be further evaluated, documented and disseminated as model practices for the field.
- The post- planning implementation period for SCI grantees will yield tremendous insight into understanding which plans were more likely to see implementation. More specifically, better understanding which regions the SCI investment was catalytic in fostering stronger regional sustainability and equity outcomes. Will plan evaluation outcomes match implementation outcomes in future years? What are the characteristics of the plans and planning processes that see greater implementation? What mechanisms have been developed to foster implementation in grantee regions post- SCI?
- The transition of the FHEA to the revised AFFH rule will be a unique case study of transitioning a pilot program to scale. The lessons learned as the AFFH rule is implemented in entitlement communities will further advance understanding of

how to structure “equity mandates” and attempts for HUD to meet its “affirmatively furthering” obligation.

- The collective impact model provides value in supplementing our theoretical tool box, particularly in approaching complex planning issues. More research is needed to understand the direct application of this model to issues such as regional planning, community development and fair housing.

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