

Equity Planning or Equitable Opportunities? The Construction of Equity in the HUD Sustainable Communities Regional Planning Grants

Journal of Planning Education and Research
2017, Vol. 37(4) 411–424
© The Author(s) 2016
Reprints and permissions:
sagepub.com/journalsPermissions.nav
DOI: 10.1177/0739456X16657874
journals.sagepub.com/home/jpe


Marisa A. Zapata¹ and Lisa K. Bates¹

Abstract

In this article, we examine recent efforts by the federal government to promote regional planning that incorporates social equity into sustainability and livability principles through the Sustainable Communities Regional Planning Grant (SCRPG). We use a plan quality analysis framework to examine grant proposals from the 2010 awardees. The analysis asks whether these regional plan proposals represent a new equity planning or if regional-scale equity policy remains obscured in quality of life arguments. We conclude with respect to the Krumholz model that regional equity planning may signal commitment to equity policy, but that regional capacity to act for equity is lacking.

Keywords

housing, land use, community development, sustainability

Introduction

Norm Krumholz's work to incorporate equity into urban planning is epitomized by the 1974 Cleveland Policy Plan's (CPP's) goal to "provide a wider range of choices for those who have few, if any" (City of Cleveland 1974, 13). Krumholz argued that planners should advocate for policies and resource allocations that would achieve socially just outcomes, and he spoke clearly about poverty and racial segregation as issues for planners to address head-on. While the era's cadre of equity planners have inspired both practitioners and scholars for decades, by the mid-1990s concerns were being raised about whether equity planning was on the wane (Metzger 1996). In particular, with the emergence of new paradigms for regional analysis and planning, scholars and advocates noted a potential fading of social equity as a core concern, debating whether social justice can be incorporated at the regional scale because of difficult politics (Imbroscio 2006; Pastor, Benner, and Matsuoka 2009).

In this article, we examine recent efforts by the federal government to promote regional planning that incorporates social equity into sustainability and livability principles through the Sustainable Communities Regional Planning Grant (SCRPG). The SCRPG is a major component of the joint federal initiative among the United States Department of Transportation (DOT), Environmental Planning Agency (EPA), and Department of Housing and Urban Development (HUD). It is implemented through HUD's Sustainable Communities Initiative (SCI) and promotes coordinated regional planning for land use, housing, and transportation in

a framework of "equitable land use planning." This program provides the opportunity to ask whether, when incentivized by federal policy, regions will develop equity plans and policies, rather than what Bollens (2003) described as developing quality of life plans where equity sometimes enters through the back door.

We examine the first round (2010) of the program, assessing 13 successful grant applications' narratives along with the content of HUD's NOFA (notice of funding availability) and some technical assistance documents provided to applicants. The analysis is focused on applications from regions with some preexisting regional planning, asking how regions incorporate equity into their overall sustainability frameworks. We use a plan quality analysis framework to look at the visions and goals in the proposals, the justification for the work based on existing conditions, and the specific activities proposed. The analysis asks whether these regional plan proposals represent a new equity planning where places articulate clear definitions of equity and who will benefit from equity planning.

Initial submission, February 2014; revised submissions, December 2015 and May 2016; final acceptance, May 2016

¹Portland State University, Portland, OR, USA

Corresponding Author:

Marisa A. Zapata, Nohad A. Toulan School of Urban Studies and Planning, Portland State University, P.O. Box 751-USP, Portland, OR 97207-0751, USA.

Email: mazapata@pdx.edu

Literature Review: Evolution of Equity Planning and Equity in Planning

The concept of equity planning is most closely associated with Krumholz's work in Cleveland, Ohio, epitomized by the Cleveland Policy Plan (Krumholz 1982; Krumholz and Forester 1990). While Davidoff's (1965) advocacy planning model promoted planning from outside the public sector, Krumholz was primarily concerned with how planners for cities should operate with respect to growing urban inequality. The equity planning model describes both a policy goal and a role for planners to be advocates for equity. Krumholz envisioned equity being fully institutionalized as a decision metric for resource allocations and programs. The CPP set out a very clear agenda that summarizes the operationalization of equity planning:

Equity requires that locally-responsible government institutions give priority attention to the goal of promoting a wider range of choices for those Cleveland residents who have few, if any, choices. . . . [T]he goal directs all of the Commission's day-to-day efforts. It enables the Commission to identify those issues that merit priority attention and provides a framework for staff analysis. Given the redistributive orientation of the goal, the staff routinely asks one major question in evaluating programs and proposals: "Who gets, who pays?" . . . If the Commission's goals and policies are to move from the printed word to the society to which they refer, the Commission cannot rest with the publication of a *Policy Planning Report*. It must do more . . . planners must become activists prepared for protracted participation and vocal intervention in the decision-making process. . . . And, in order to articulate issues, organize supporting data, and make meaningful recommendations, the agency must have goals (Krumholz, Cogger, and Linner 1975, 299).

Krumholz identifies the statement of a clear equity goal as essential to planners' pursuing the policies and programs that will achieve outcomes of more choices for those who have few. One of Krumholz's (1982) key lessons is that "the essential step towards developing an activist role lies in the adoption of a clearly defined goal. Without such a goal, planners have had difficulty answering the question of how best to allocate limited agency resources" (173). The goal not only guides the principles of the work, it directs planners to conduct policy analysis and evaluate implementation along equity lines: "Pursuit of equity objectives requires that planners focus on the decision making process, and focus on it not with rhetoric but with hard, relevant information" (Krumholz 1982, 173). Equity planning is about the technical work of developing and implementing policies, plans, and programs—including data analysis of costs and benefits and evaluating and proposing new resource allocations.

The equity planner is not only a technocrat but an advocate within public institutions. Sandercock (2004) describes: "These choices recognize that planning practices involve

resource allocations, and the most transparently political planners will always be alert to the political economy of those allocations, to the question of who is getting what, where, and how" (135). Krumholz emphasized that achieving equity planning required the willingness to engage in the political arena, in a world beyond the planning commission. He later identified the lack of political courage and acumen as a reason that equity planning did not sufficiently take hold, pointing out that "planning practice actually is cautious and conservative" and director-level planners were anxious to keep their jobs, promoting only incremental change (Krumholz 1982, 172).

While the CPP was developed for the central city of Cleveland, its analysis of urban inequality and proposals for solutions do offer equity planning guidance for regional-scale planning. The analysis in the CPP of regional challenges in transportation planning and suburban exclusion of affordable housing remain relevant today; and the political challenges of coordinating interjurisdictional redistribution of resources and population continue to vex planners seeking equity at a regional scale. Several frameworks have emerged for thinking about and acting for equity at the regional scale. Though somewhat differentiated, progressive regionalism, new regionalism, equity regionalism, and regional equity reference the promotion of "structural changes to remedy fiscal inequity between city and suburb, or spatial solutions that open up suburban housing or jobs to the urban poor" (Chapple and Goetz 2011, 458–59).

Still, regional planning practice has not adopted a Krumholzian equity planning model. Bollens (2003) argues "regional equity policies are advancing not in an integrated fashion based on local deliberation, but in piecemeal, secondary ways in reaction to a confluence of intergovernmental impulses and quality of life concerns" (646). Thus, social equity is addressed idiosyncratically as a by-product of policy goals for sustainability. Equity can only be brought in through the "back door" of regional policies and programs (Bollens 2003, 646–47). Following on Bollens's (2003) conclusions about regional politics, Pastor, Benner, and Matsuoka (2011) argue for equity advocacy at a new scale, making the case that "social movement regionalism may be particularly effective in productively addressing the inevitable tensions and conflicts that emerge in regional equity strategies, including the relationship to business-oriented regionalism, labor–community alliances, and the role of race" (437).

Not everyone agrees equity at the regional scale makes the most sense, and the question of whether social justice can be addressed through regional-scale social movements supporting equity planning is debated (Imbroscio 2010; Pastor, Benner, and Matsuoka 2009). Imbroscio (2010) argues for the continued "inside game" of central city actors' improving the local community, recognizing an antagonistic posture between suburbs and inner cities. Pastor, Benner, and Matsuoka (2009) advocate that redistribution must occur across jurisdictional lines and requires an "outside game" of

city-suburban cooperation toward equity. Chapple and Goetz (2011) find that there are “informal regional governance strategies employed by networks of public, private, and civic actors” that may address economic justice, but the regional approach deflects attention from the defunding of basic social supports and subsidized housing programs (471). Indeed, Woods (2004) laments that a direct focus on social justice is simply not viable in the scholarship and practice of regional-scale planning with a sustainability paradigm: “Questions of racial, ethnic, and class equity have been meticulously excised from the literature of new regionalism, smart growth, sustainable communities, and creative communities” (260). Despite the growing interest in and observations of regional equity work, these approaches leave equity as something that must be integrated into a framework more palatable to regional political actors, rather than starting from a strong equity goal as fundamental to the policy work.

However, regional planning does respond to federal incentives and directives, creating the opportunity for the SCI, and particularly HUD’s SCRPG program, to induce a greater focus on social equity. The SCRPG could serve to bring equity policies through the front door of regional planning as a federal program that directs regions to explicitly incorporate equity into sustainability goals and to integrate and coordinate planning that addressed underserved populations. The SCRPG has specific directives for regions to focus on civil rights and fair housing, considering racial and ethnic minority populations and those who have had intergenerational poverty as high priorities for improved outcomes. The focus of the program is on mainstream planning activities—chiefly the coordination of transportation, land use, and environmental planning—prompting regions to include housing into its regional planning and to produce “equitable land use planning” that does not exclude or segregate.

Recent findings on the challenges for regional planning to promote equity across policy areas suggest that the SCRPG includes some heavy lifting for equity planners. For example, the Government Accountability Office’s analysis (2009) of the difficulties of incorporating affordable housing in transit-oriented development plans at a regional scale finds barriers such as coordination across jurisdictions and policy sector institutions, incompatible plan timelines, and unclear delineation of roles and responsibilities across institutions for implementation and monitoring. In states with requirements for “fair share” affordable housing allocations in regions, implementation and enforcement has been spotty and many areas have yet to meet housing goals (Provo 2002; Hoch 2007). Goetz, Chapple, and Lukermann (2003) and Hoch (2007) reported that some requirements became merely symbolic, without real implementation strategies or dedicated resources. As we look at the SCRPG’s incorporation of equity planning principles, examining the proposals’ basis for actual implementation will be a major consideration in assessing the potential for advancing equity planning in regions.

Research Questions and Design

Research Questions

We ask two research questions:

1. Is the HUD Sustainable Communities Regional Planning Grant (SCRPG) an equity planning program akin to the Cleveland Policy Plan (CPP)?
2. How do the 2010 SCRPG recipients propose to implement the equity work in their regional planning?

In comparing the equity planning advanced in the Cleveland Policy Plan to the planning in the HUD Sustainable Communities Regional Planning Grant (SCRPG) program, we look at equity along two core dimensions: conceptual and operational. Our first question is whether the SCRPG program itself represents a model of equity planning akin to that of the CPP. The CPP is a model of an equity plan that includes both a defined goal of equity (conceptual) and a set of activities and resource allocation decisions (operational). We compare the major definitions and dimensions of equity planning described by Krumholz and operationalized in the CPP with those described in the Notice of Funding Availability for the SCRPG, the technical guidance offered by HUD and other federal agencies during the application process, and the additional technical assistance provided for applicants by PolicyLink and the Kirwan Institute, both HUD contractors for this purpose.

To answer the second questions, we then closely read the grant applications to describe SCRPG proposals relative to the equity planning model. Our analysis is based on the applications of the 2010 grantees in the category of regions with preexisting regional planning activities. We assess the conceptual and operational functions of the SCRPG applications, evaluating the following:

- Do grantees define a clear principle for “equity” that defines an equitable region, justifies equity as a goal, and prioritizes some populations?
- Do grantees operationalize equity into the activities of their grant, including specific activities that are linked to an equity agenda in policy or resource allocations along the definition of “equitable land use” used in this program?

Research Design

Plan analysis. Our research design is guided by the extensive literature on plan quality evaluation. Plan analysis has assessed both conceptual and operational dimensions, examining documents’ goals and objectives, priority and strategy setting, policies and implementation plans, and evaluation (Berke and Godschalk 2009). We treat the grant applications as plans, and they include the characteristics identified for

Table 1. 2010 Sustainable Communities Regional Grant Category 2 Recipients.

Grant Recipient	Main City or County	State	Reviewed ^a
California State University, Fresno Foundation	Fresno	CA	No
Capital Area Regional Planning Commission	Madison	WI	Yes
Capital Area Texas Sustainability Consortium (CATS)	Austin	TX	Yes
Chicago Metropolitan Agency for Planning	Chicago	IL	No
Chittenden County Regional Planning Commission	Chittenden	VT	Yes
Corridors of Opportunity	Minneapolis	MN	Yes
Heart of Illinois Sustainability Consortium	Peoria	IL	Yes
Knowledge Corridor Consortium	Hartford	CT/NY	No
Lane Council of Governments	Eugene	OR	Yes
Metropolitan Area Planning Council	Boston	MA	Yes
Mid-America Regional Council	Kansas City	MO	Yes
New York–Connecticut Metropolitan Sustainable Communities Consortium	New York	CT/NY	Yes
Puget Sound Regional Council	Seattle	WA	Yes
Sacramento Area Council of Governments	Sacramento	CA	Yes
Southeast Michigan Council of Governments	Detroit	MI	Yes
Thomas Jefferson Planning District Commission	Charlottesville	VA	No
Salt Lake County	Salt Lake City	UT	Yes

^aWe could not obtain grant applications for four regions.

plan quality analysis. The proposals also lay out the plans of the regions to act. We want to examine the level of specificity in the regions' proposals as they set out to write regional plans. The plan quality literature suggests that where goals are not well articulated, they are less likely to have policy and implementation strategies that are specific and fully developed.

We employ text analysis of the proposals to consider whether the conceptual and operational dimensions provide a robust basis from which to do equity planning. Because these documents were written in response to a template that provided fairly specific guidance on how to describe activities and their implementation, we are not reading the plans for their overall quality per se. Our analysis addresses these plan elements specifically as they relate to the concepts of equity planning and equitable land use.

We selected grant proposals for accepted proposals in the 2010 Sustainable Communities Initiative Regional Planning Grant program. All of the thirteen proposals reviewed were considered "category 2" applicants, meaning regions that have an existing regional governance infrastructure. (Table 1 includes a list of all category 2 awardees.) The regions already have some existing regional plans, and had to have a consortium to apply for this grant for developing new activities toward programs goals and creating a detailed implementation plan. The consortium consists of the Metropolitan Planning Organization, the principal city of the region, additional jurisdictions representing at least 50 percent of the population, and nonprofit organizations that represent or can engage with "diverse representation" (HUD 2010, 18–19). The analysis of the grant applications included "Factor 3—Soundness of the approach" section of the grant narrative. Because the sites had existing regional capacity at the time of

their application, we believe that they will have a more developed set of concepts and actions in which to implement equity planning.

The proposals for these regions are meant to extend and advance existing planning to address the full spectrum of sustainability and livability concepts outlined in the SCI. The Sustainable Communities must create a comprehensive regional plan for sustainable development (referred to as the RPSD), which is an integration of local and regional land use plans, infrastructure and capital investment plans, and existing housing and/or climate action plans. The RPSD includes adopting a housing plan, incorporating equity and fair housing analysis into regional plans, advancing regional transportation, advancing water infrastructure planning and environmental planning, economic development activities, scenario planning, and/or comprehensive climate change initiatives. The grant could fund "efforts to fine-tune existing plans," detailed execution plans, and predevelopment planning for specific projects (HUD ND, 15).

Based on this set of plan elements, we assess how regions incorporate equity activities and how well they are planned. Following on the plan quality analysis literature, we consider how fully developed and articulated the proposals are with respect to equity in terms of their visions, goals, context/background, and activity programs, including evaluation. We describe the agreed upon visions and goals for this Sustainable Communities program, and in some applicants, which of these are newly adopted goals in response to the program's framework.

We also assess how regions have framed and defined their current context, given the prompt to discuss dimensions of social equity. This section aligns with the factual basis of plans, where plans should identify major issues and trends in

a way that provides a sufficient basis for policy-making (Bassett and Shandas 2010; Berke and Godschalk 2009; Norton 2008; Hopkins 2001; Baer 1997). Do these plans describe the scope of equity issues in their regions?

Activities form the core of the proposal: how will regions and local jurisdictions take on the sustainable communities challenge by changing policies and planning practice at a regional scale? This analysis allows us to consider dimensions such as whether there are specific policies to be implemented or if policies are merely going to be considered; how explicitly activities are linked to equity target populations; how mechanisms and strategies are delineated to achieve goals and how they will be evaluated.

We coded the grant proposals according to the concepts of social equity and “equitable land use planning” as described in the grant NOFA. We code for the conceptual and operational frameworks of the proposals. First, we examine the problem definition, “vision statement,” and conceptual/factual basis. This coding includes key words that describe values (equity, opportunity); populations named; the description of the fundamental nature of the equity problem in regional context; and words and phrases indicating a problem statement and/or goals around the equitable land use concept.

Second, we examine the proposed activities that are new work to be undertaken using grant funds. We assess the actions described looking at the verbs employed; determine whether activities are at an implementation stage or are being studied or considered. For instance, assessing affordable housing barriers along with writing recommendations to remove said barriers were classified as study activities. Stating you would rewrite zoning codes was classified as an activity. We also look for population targets and outcomes metrics.

We developed an initial list of terms to code and, together with two graduate assistants, we coded the proposals. We also conducted *en vivo* coding, identifying new corresponding codes. To start, we each coded two grants. We compared the lists, identifying things that should not have been quoted or things that were missed by one another. This comparison increased interrater reliability. From there, the research assistants coded the remaining grants and compared them with one another.

Study limitations. There are several limitations to this study. First, we review only the grant applications and did not interview applicants or read about other work in their regions. The proposals are representative of what regional planning organization and consortium members were able to agree to and commit to at the time of writing the proposal. These grantees had some degree of regional planning completed, and needed sign-on by numerous jurisdictions and institutions to apply for the program. Planners may have hesitated to attempt to forge new visions and broad goals about social equity where consensus had already been reached using certain framing such as sustainability and livability language.

We also limited our review to funded grant applications. The unfunded applications may have other examples of equity planning. We did not have access to the HUD rating and ranking. Successful grant applications may not have scored as highly in equity planning as other grant applications.

Findings: Equity Planning in the SCRPG

Is the SCRPG an Equity Planning Program?

In order to first assess the extent to which the SCRPG is a model of equity planning, we compare its purposes and goals with those of the CPP. The CPP equity definition—providing choices for those who have the fewest—suggests two dimensions to assess: one, does a plan define an equity goal relating to “those who have the fewest,” and two, does a plan define policies or activities that clearly expand choices for that targeted group? As discussed in more detail above, the CPP, while at a city scale rather than the region, addressed a range of issues including economic development, transit, housing (including regional housing markets and discrimination), and community development.¹ An additional feature of the Cleveland Policy Plan includes a lengthy discussion of philosophers who make a case for justice on the grounds of social good. This discussion justifies the equity focus from various perspectives. In Table 2, we compare the CPP and SCRPG with discussion about the SCRPG as an equity planning document below.

The justification for prioritizing equity in the Sustainable Communities program is not expressed in the fundamental philosophical terms of the CPP. Instead, arguments are about overall benefits to the region: equity brings prosperity, equity reduces costs for various social ills, equity is “a superior growth model.” These arguments presage a “what’s in it for me?” response to an equity agenda with an attempt to provide empirical evidence of benefits. Technical guidance from PolicyLink’s documents touches on both types of arguments, stating,

Equity, by definition, means fair and just inclusion. Social equity is an important goal in its own right: ensuring that regions are becoming fairer and more just places where all residents can access and take advantage of the region’s economic, social, and environmental assets is a worthwhile aim of regional planning. But focusing on social equity is also imperative to achieve our goals for economic competitiveness, public health, and environmental health—and it is becoming more so over time. (Rose et al. 2011, 1)

The SCRPG program defines goals that are broader than—but encompassing of and deeply intertwined with—social equity within a framework of *livability*. The basic vision of the HUD/DOT/EPA Sustainable Communities partnership is “economically competitive, healthy, environmentally sustainable, and opportunity-rich communities”

Table 2. Comparing Equity Dimensions in the Sustainable Regional Planning Grant with Cleveland Policy Plan.

	CPP	HUD NOFA
What is equity?	“to provide as wide a range of alternatives and opportunities as possible, leaving individuals free to define their own needs and priorities” (KCL 1975, 299)	“fair and equal access to livelihood, education, and resources; full participation in the political and cultural life of the community; and self-determination in meeting fundamental needs” (HUD ND, 13). Livability principles for SCI: 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
Targets of equity	Those who have fewest choices: that is, poor, minorities, elderly	“underserved populations” defined as fair housing law protected classes and those with long-standing economic disadvantage (HUD ND, 13–14)
Addressing past policy	Factual basis includes legal, political, and economic and social institutions that played a “crucial role . . . in promoting and sustaining inequities” (CPP 10)	Equitable Land Use planning addresses regulatory barriers at the local and state level, previous planning that led to racial and economic segregation
Legal frameworks	Philosophical frameworks, both deontological and utilitarian Civil Rights Movement	Civil Rights Act Fair Housing Act and “affirmatively furthering fair housing” Consistency with HUD Consolidated Plan for affordable housing
Activities/elements	In all policy areas, planners use the equity definition to determine policies, resource allocation, and define metrics for success: Direct income support, jobs and economic development, transit accessibility, housing including regional fair housing, community development	“Detailed execution plans and programs” are activities to strengthen elements of existing plans, implementation of existing plans: Adopt a housing plan, incorporate equity and fair housing analysis into regional plans, advance regional transportation, advance water infrastructure planning and environmental planning, do economic development activities, scenario planning, and/or comprehensive climate change initiatives.

Note: CPP = Cleveland Policy Plan; HUD = Department of Housing and Urban Development; KCL = Krumholz, Cogger, and Linner; NOFA = notice of funding availability; SCI = Sustainable Communities Initiative.

(HUD ND, 5). The SCRPG program was developed to address a broad scope of urban issues, with clear normative statements on livability principles relating to equity in housing, transportation, and neighborhood planning. Included in the purpose statement for the program is that plans should consider the interdependent challenges of “social equity, inclusion, and access to opportunity” (HUD ND, 3). HUD provides a definition for social equity values:

The term “social equity values” means fair and equal access to livelihood, education, and resources; full participation in the political and cultural life of the community; and self-determination in meeting fundamental needs. (HUD ND, 13)

Social equity activities are to be targeted to “underserved populations” defined in the NOFA as related to fair housing law-protected classes and those with long-standing economic disadvantage (HUD ND, 13–14). There is a clear emphasis on people and communities of color (areas “heavily populated

by minorities”); immigrant populations (racial/ethnic minorities with limited English proficiency); and those in poverty, particularly those with “generational economic disadvantage, job dislocation, or other forces that prevent them from achieving individual and family self-sufficiency” (HUD ND, 14).

A key function of the SCRPG funded plan is to incorporate social equity values into land use plans and zoning regulations. More specifically, the NOFA defines “equitable land use planning” as a major component of a regional plan for sustainable development. Equitable land use planning is explicitly linked to both Title VI of the Civil Rights Act and the Fair Housing Act. That linkage provides not only a set of activities for planners’ achieving equitable land use planning, but also denotes target populations (analogous to Krumholz’s “those who have fewest”). Equitable land use planning is defined as

zoning, land use regulation, master planning, and other land use planning that, at a minimum, furthers the purposes of Title VI of the Civil Rights Act, Section 504 of the Rehabilitation

Act of 1973, and the Fair Housing Act and are intended to achieve additional objectives for expanding housing choice—for example, inclusionary zoning for housing designed for underserved populations on the basis of race, ethnicity, or socioeconomic group. Incorporation of environmental justice concerns into planning decisions/outcomes; prohibition on the creation or maintenance of racial or ethnic enclaves (unincorporated areas surrounded by incorporated areas, often without access to public services or utilities); affirmative efforts to overcome the effects of segregationist laws and covenants; and coordination of housing development and public transportation to provide access to educational and employment opportunities. (HUD ND, 10)

Another major area of emphasis is the increased participation of underrepresented populations in meaningful ways in decision making about regional planning and infrastructure investment. Resident engagement for those traditionally marginalized is emphasized in proposal guidance presentations by HUD and DOT, and the technical assistance provided by PolicyLink.

Compared to the CPP model for equity planning, this program meets the dimensions of an equity plan. The Sustainable Communities Regional Planning Grant program NOFA and supporting documents define this program's parameters and purposes. The documents demonstrate that program supports work across many planning areas, from land use and infrastructure to watershed management, and economic development and housing, with all these areas linked to the clearly defined concept of social equity and the populations referenced in civil rights legislation. From a conceptual understanding of how equity should shape a region to nuts-and-bolts operationalization of how to do equity, the SCRPG program provides a map to help regions achieve an equitable place.

Implementing Equity Planning in the SCRPG Region

To assess how the SCI regions interpret the equity framework outlined by the HUD NOFA and other programmatic documents, we examine how the sites describe equity conceptually and how they propose operationalizing work for equity in their grant applications. Table 3 summarizes these findings for each site.

Conceptualizing equity. In assessing the proposals' concept of equity, we ask what the vision for "equity" looks like? How do the grantees envision an equitable place/city/region? What justifications are given for advancing equity as a high-level goal for planning? In particular, we are interested in how the equity framework defines which populations should receive attention or priority.

The vision of equity and its rationale. The SCRPG program embeds equity as part of a livability or sustainability agenda and addresses a broad range of policies, including

environmental issues and climate change. While the program covers many sectors, it does provide special emphasis on the distribution of affordable housing and fair housing regionally. The proposals, following the SCRPG framework, view equity as part of sustainability. However, the visions of the region implied by the proposals are not often focused on outcomes of equity. There are few fleshed-out visions of a socially equitable city or region, of racial integration, or of a more equitable economy.

Some of the proposals' main vision is of "vibrancy"—which implies economic health or the greening of communities but does not specify an anti-poverty strategy. For example, proposals envision "vibrant, green, connected corridors," a "world class region that is vibrant, competitive, and connected," or seek to "create vibrant, livable, and healthy communities" with a vision of "our people, our prosperity, and our planet." While livability includes equity in the NOFA, the vibrant community as articulated by these regions does not reference equity or diversity in its main vision statement. "Vibrant" may imply diversity as a component, but does not particularly connote equity.

The words used in these visions may be boundary objects—terms that can be agreed upon by many stakeholders because each inserts his or her own meaning implicitly. The plasticity of terms like *vibrant*, *healthy*, and *livable* mean they can be recognized by many groups, even though the groups may be talking about different visions when pressed to define specifics.

Most of the proposals attempt to link social equity to broader regional benefits than just improving the lives of those who are less well off. Nearly all regions argue for addressing inequity because of its consequences for groups outside the target populations, making the case for efficiency in public resource allocation, including reducing public health costs, for a stronger economy, and generally for improved quality of life for all. These rationales are much like Bollens's (2003) findings, that equity is part of an overall quality of life argument for regions: often put in terms of economic growth and prosperity.

Several regions connect the RPSD to health outcomes and cost savings from reduced health problems. Even more pointedly, four regions discuss the reason for an RPSD as more efficient use of public resources and leveraging money. Sacramento grant states as a rationale for addressing equity, that it will "build a foundation for an economic rebound, through reduced housing and total living costs and diversified and increased employment opportunities" (Sacramento Area Council of Governments 2010, 1). The Austin region proposal does describe equity as a matter of fairness but primarily discusses the need for a stronger economy (Capital Area Council of Governments 2010). One striking exception is the Boston region, which describes its issues as being "plagued with inequality" and linking an RPSD to combating social fragmentation and inequities due to sprawl and foreclosures, as well as to climate change and

Table 3. Findings Summary by Site.

Place	Equity Defined?	Targeted Populations beyond Underserved ^a	Activities Focused on Studying or Action ^b	Outcome Metrics
Austin	Yes	Choice riders	Study	Vague
Detroit	No	All income groups	Study	None
Chittenden	No	Workforce (not defined but separated from low-income)	Study and action	Specific
Boston	Yes	All income groups	Study and action	Specific
Eugene	Yes	Specialized populations (not defined)	Study	None
Kansas City	Yes	None	Study and action	None
Madison	Yes	None	Study	None
Minneapolis	No	Across income spectrum	Action	Specific
New York City	No	Moderate income households; workforce including professional and technical workers	Study and action	Specific
Peoria	Yes	Workforce	Study	None
Sacramento	Yes	All segments of society	Study and action	Vague
Salt Lake City	Yes	Area median income (AMI) households categories, including 80% AMI, 50%–80% AMI, 30%–50% AMI; Large families	Action	Specific
Seattle	Yes	All races and ethnicities; all incomes	Study and action	None

^aHUD defines underserved populations as immigrants, homeless, rural, disabled, historically marginalized groups, and economically disadvantaged.

^bStudying includes activities such as housing inventory analysis as well as plan writing. Action activities include things involving concrete implementation such as securing agreements about changing zoning codes.

environmental sustainability (Metropolitan Area Planning Council 2010, 2).

Despite the SCRPG program's call for regions to address equity within a livability framework, only four regions explicitly link the benefits of sustainability or livability to the targeted populations as well as to the broader community. Peoria states that "A community can only be sustainable if the great majority of the citizens are contributing in a positive way to the economy" (Heart of Illinois Sustainability Consortium 2010, 7). The Boston vision also describes "fairly sharing the costs and benefits of the region's growth" as an outcome of sustainable regional planning (Metropolitan Area Planning Council 2010, 2).

Even with a federal program that diagnoses current spatial inequality as a function of past and present planning and policy at a regional scale, few proposals name inequitable land use as a major culprit in their current problem statements. Further demonstrating the disconnection between the origins of the SCRPG and the CPP, only two regions identify a rationale for equity that is simply that equity is the right thing to do. The other regions, when they made arguments for equity, did so in the context of how inequity could hold a region back.

Who is part of equity and how will they measure equity? Equity planning needs a target—the least advantaged, those with fewest choices—the populations whose condition is meant to be improved. HUD's NOFA focuses on several key populations related to urban disadvantage and fair housing, listing a definition for "underserved

populations" that includes low-income people and people of color, people with Limited English Proficiency, and the elderly and disabled.

The actual grantees, however, are far less specific about the populations of concern in the problem statements, goals and visions, activities, and outcome measurements in their proposals. Describing whom "equity" is about is included in both the conceptual framework of the proposals and the activities section. We include both components in the analysis here because no sites talked about the same groups across the two sections of their proposals.

Many proposals use the concept of expanding choices and opportunities. "Choices" are not only about those who currently have no/few choices, but also about those with many options who might choose to live elsewhere altogether. Of thirteen proposals, eight specified some groups in their overarching framework that referenced income or racial groups.

Equity planning could also target class inequality. In the SCRPG proposals, five metro areas used the terms "poor" or "poverty" (Madison, Kansas City, Boston, Texas, and New York City). Three additional areas discussed those with low incomes. However, Minneapolis discusses their major goal of transit accessibility for "people across the income spectrum" and New York City highlights their "most critical competitive challenge" as housing for the "vital workforce" of technical and professional workers.

The NOFA also targets people of color and immigrants with limited English proficiency as a civil rights protected class and is especially underserved. Just five metro areas specified "minorities," communities of color, or racially

segregated communities in their proposals: Madison, Kansas City, Boston, Seattle, and Peoria. Peoria in particular discusses the confluence of race, income, and place, arguing that its untapped potential lies in the underserved, low-income African Americans who live in the core of the city. This proposal makes the most explicit connection between success of this defined group and success of the region. Only two metro areas discuss immigrants: Seattle, which addresses the intersection of low-income, minority race, and limited English proficiency. Austin's proposal uses the term "illegal immigrants" to describe a community in need of basic services.

Of the needs statements, only Boston, Peoria, and Kansas City acknowledge the role of policy and planning in maintaining racial segregation in their regions. Kansas City discusses racial covenants and deed restrictions. Peoria states that the concentration of poverty "is not a result of natural human behavior; rather it is a direct result of community opportunities and empowerment aimed at specific segments of the population over generations" (Heart of Illinois Sustainability Consortium 2010, 9).

Other proposals discuss equity without a clear statement that greater resources, targeted programming, or inclusive engagement in decision making will be directed to the groups identified in the NOFA. In the proposed activities, regions include a wide range of beneficiaries of their new work. Only five regions identified specific groups that are also HUD-targeted equity groups. For instance, Minneapolis references low-income and marginalized populations as their target groups making affordable housing information more accessible. Instead, more sites rely on a "raise all boats" mentality. Austin discusses "choice riders" as a primary target in their transit-oriented development activities. Places such as Boston that do discuss low-income households in their activities also mention the importance of serving all income groups. The shift from targeting specific groups for equity to serving everyone in the community illustrates the lack of commitment to serve those in the most need first and foremost.

How do planners both meet the needs of marginalized groups while meeting the needs of all groups? Salt Lake City illustrates the complexity of this challenge. Salt Lake City specifies determination of affordable units for households at different income classifications. Most of those are variously described by percentage of area median household income (AMI) and in other descriptions as middle, low, and very low income that relate to AMI classification but are newly grouped together. There is also proposed prioritization for seniors, people with disabilities, large families, domestic abuse victims, homeless persons, refugees, those with HIV/AIDS, and people needing transitional housing. To be sure, these are all groups in need of affordable housing, but there is no sense of what housing equity would mean for each of these different needs, how to prioritize among them, or how regional planning activities would affect their conditions.

The decision rules for planning advocated in the CPP may become hazier with less focus on the specific underserved populations. The CPP guideline "for those who have few if any choices" or definitions for "underserved populations" could serve as decision-making parameters for policy choices, resource allocations, and defining metrics for success. However, these guidelines only will be useful if they are developed with an assessment of the people and the related politics that determine how land use policy is created.

Equitable land use: Problem diagnosis and planning as a solution. The proposals describe the factual basis for their activities and then relate activities to these existing conditions and needs. The NOFA defines equitable land use to both explain current segregation and sprawl and to prescribe activities that are affirmative efforts to reverse trends. In this analysis, we describe how today's grantees define their current conditions and trends and activity plans with respect to equitable land use.

While there are a number of baseline data indicators prescribed by HUD, regions had leeway to discuss the origins and potential solutions for regional problems. In examining how grantees framed their equity problems with respect to land use planning and policy, we analyzed explicitly naming past/current practice as a cause for equity problems and naming land use planning as an important solution to equity problems. Five of thirteen regions clearly identified past and ongoing planning practices as a component of their current problem statement, relating to equitable land use issues. Among the identified equitable land use issues in these five regions were

- land use and zoning that promoted sprawl and auto dependency to the detriment of low-income residents' access to education, employment;
- failure to plan for, or implement plans for, regional fair shares of affordable housing and/or fair housing choice;
- land use practices that allowed for exclusion, furthered by real estate practices including deed restrictions and racial covenants.

Most notably, the Peoria proposal states that "the region has learned the hard way" about the city-suburb divide, and concludes that "the concentration of poverty and disparity is not the result of natural human behavior; rather it is the direct result of community opportunities and empowerment aimed at specific segments of the population over generations" (Heart of Illinois Sustainability Consortium 2010, 9).

Even without having a clear problem statement about equitable land use, three additional regions provide future directions for addressing equity via land use planning practice—primarily by aligning housing plans with transportation planning. One region recognizes that resistance

to affordable housing by suburban residents will be an important factor in changing land use practices, an important consideration for future implementation, as discussed below.

Operationalizing equitable land use. Having found limited linkages to the equitable land use concept in the needs analysis, we assessed proposed activities for equitable land use in the proposals. We asked whether the regions' activities were studies or policy changes. We also assessed their proposed outcomes metrics, asking how progress toward equity is defined and measured.

Studying or acting? Regions vary in the degree to which they proposed studying their region versus acting on existing information to achieve equitable land use. Six sites focus on studying issues tied to equitable land use. Sites that study use terms such as "analyze," "examine," and "review." Four regions propose a balance between studying and acting on equitable land use planning. Three concentrate on action, using terms such as "develop," "secure," and "finance" in the descriptions.

The NOFA mandated that the regional sustainable development plan create a housing plan and conduct a regional analysis of impediments to fair housing choice, activities that start with a basis of studying the region. The six "studying" regions will conduct some type of regional analysis of impediments or fair housing assessment as part of their "study" based activities. These regions will collect and analyze data, including indicators about the existing housing stock and economic and demographic profiles of communities. Regions will also assess the regulatory framework in which they operate including an evaluation of existing plans and policies and what impediments will affect their efforts to achieve housing goals.

The data collection and analyses will be used by most of the sites to write plans or craft policy recommendations. Broader goals include things like creating or preserving workforce housing or affordable housing. Other activities include writing fair housing plans for specific jurisdictions such as Long Island in the New York City region. Regions such as Peoria and Austin discuss using data to make arguments to people and organizations in positions of power; however, they do not discuss how they might accomplish this. Thus, while these activities move toward action, they do not demonstrate a clear path forward to accomplishing equitable land use.

Regions that include extensive and specific action activities around equitable land use included Chittendale, Boston, Kansas City, New York City, and Salt Lake City. Specific activities included things such as changing zoning bylaws (Chittenden), conducting trainings on how to include equity goals into plans and policies (Boston), and creating an affordable housing incentive fund (New York City). Minneapolis included a coherent set of fair housing activities, though they

were limited in scope. They propose developing websites and manuals for people looking for affordable homes, people involved in real estate, property owners, managers, and government employees.

A couple of sites include a handful of specific activities, but they lack the expected robustness given the complexity of the issues and are disconnected from equitable land use. For instance, Eugene describes writing a white paper: the extent of their specific activities. Austin includes "ribbon cuttings," with no explanation of what the ceremonies were or would accomplish (Capital Area Council of Governments 2010, 13). Table 4 provides examples of specific action activities for the sites.

Even the sites that provided specific actions often included caveats. For instance, Chittenden propose a concrete action, but with a conditional verb: "it *could* rank communities by those who are zoned to allow for expected growth patterns and changing demographics as compared to those who have created barriers to this growth" (Chittenden County Regional Planning Commission 2010, 22, [emphasis added]). This equitable land use action includes the types of caveats seen throughout the applications.

Overall, we found the housing activities vague or non-committal. There is limited discussion of creating requirements to achieve, such as mandating inclusionary zoning. Many of the regions are starting with extensive data collection and analysis and may be limited in their ability to know their next steps at this time.

However, the lack of specific activities is especially noteworthy given that the regions studied are category 2 sites and are further developed as places that plan regionally; presumably they have forged some agreements about interjurisdictional decision making and coordinated policy implementation. "Studying" rarely includes assessing the capacity of institutions charged with implementation to understand what new resources or structures are needed to carry out coordinated planning or new policy for equity objectives. Given their category 2 ranking, their lack of previous study is surprising. Fewer than half of category 2 sites are prepared to execute comprehensive actions around equitable land use without additional studying. Sacramento stood out here and serves as an example of a region where further study is not needed; they state they need to work to help localities update plans and policies to further fair housing goals.

Assessing implementation of equitable land use: Outcome measures. In addition to the plan and policy assessments, the regions are expected to measure the outcomes of their activities, a central component of implementation. Only six sites provide specific measurement indicators for any of their activities, and few of those focus on outcomes for marginalized populations. Even fewer provide details about how they will measure their action-based activities, as opposed to the regional housing analysis that is all measurement. Regions might propose tracking how affordable housing supply

Table 4. Sample Specific Action Activities.

Place	Sample-Specific Action Activities
Austin	None
Detroit	None
Chittenden	Make changes to zoning bylaws and implementation of bylaws to increase choice and fair housing
Boston	Conduct trainings and strategies to incorporate affirmative marketing and fair housing goals in local plans and policies
Eugene	Write white paper about next steps for housing (among others) as part of community sustainability baseline
Kansas City	Create new capacity to assist existing housing development nonprofits and create where necessary
Madison	None
Minneapolis	Develop online website that details the affordable housing market
New York City	Incentive housing fund—grant funding to match LISC: provide seed capital to affordable housing projects within walking distance of public transportation to help cover costs of development of affordable housing such as site control, preliminary plans, engineering/environmental review, legal, marketing/preliminary feasibility assessments
Peoria	Develop home-buying educational tools
Sacramento	None
Salt Lake City	Secure commitments of local governments to expand supply for low- and moderate-income homes
Seattle	Create new TOD financing tools with a property acquisition fund for affordable housing and TIF alternative

Note: LISC = local initiatives support corporation; TOD = transit oriented development; TIF = tax increment finance.

changes over time, but this is not necessarily tied to direct policy actions. The lack of indicators likely comes from the limited number of sites proposing clear action activities. When they do propose actions, they tend not to be linked to strong metrics for outcomes. Many of the sites have not identified what they will do exactly or how they will demonstrate progress (or not) toward their goals. Most perplexing, even when measurement outcomes are specified, there are almost no regions that specify how much change should be expected for marginalized groups.

Exemplar regions. While overall our analysis found much to be desired about the regions' description of and proposed actions to address equity, we did find sites that stood out in their ability to analyze and name equitable planning activities. In this section, we highlight regions that offer examples of what it would look like to be working toward an equitable region. We believe that drawing on the examples that these sites offer could help regional planning bodies understand what doing equity planning entails: a clear goal with priority for underserved groups and a set of activities aimed at measurably improving their outcomes and opportunities set in a context of understanding the role of past and present planning in creating and potentially mitigating inequity. A strong equity plan has a clear statement of activities and actors for implementation.

All around strong performer. Boston includes an analysis of past and present inequity and segregation as well as extensive statements about equitable land use as a goal for the future. The proposal specifically discusses zoning, other plans in the region, and identifies relationships and actors

necessary to advance policy changes. Boston also identifies people in poverty across the proposal as a priority group, setting a more clear goal as the CPP did. Boston identifies a range of measures to assess progress for equity. While most of their activities fall on the study end of the spectrum, specific actions include trainings to incorporate affirmative marketing and fair housing goals. We would have liked to see more specific action activities and a deemphasis on including all income groups as targets in order to call it a full exemplar.

Conceptual framework: Problem and needs statement. Peoria stands out with their acknowledgement of past and present land use practices with respect to race and poverty. They discuss the political challenges of working through local governments, stating that they will use data from the research to try and prompt action from local governments. They are cognizant of the legacy of race in shaping their communities as well as understanding how to operate with different political actors.

Kansas City also provides a diagnosis of past land use practices' relationship to segregation. In their application, they describe a region effected by racism, inequitable practices, and White flight. They clearly articulate how

Issues of class and race have also contributed to the region's rate of outward development. Historically, racially based covenants, deed restrictions and real estate practices restricted African American residences to the urban centers of Kansas City, Mo., and Kansas City, Kan. When these restrictions were outlawed, white, middle-class families moved outward to avoid integrated neighborhoods and schools. (MARC ND, 3)

Kansas City also places a heavy emphasis on helping those least well off in their work. Having a formulated understanding of the role of planning and policy in current needs of racial and economic segregation is important for developing a path forward.

Specific equitable land-use activities. NYC provides a range of proposed activities, both building on existing work and offering new programmatic activities. They include building regional consensus for the definition of “fair-share” housing and forging agreements to act. The region recognizes the work of getting partners to agree to plan and act together. NYC was also one of the few sites to explicitly acknowledge the possibility of political conflict. They also propose drafting and implementing a plan that all communities commit to implementing. As an example of specific programming, they describe working with LISC to provide capital for housing projects.

Seattle provides substantial depth on their activities to further equitable housing. Their multitude of activities includes trainings, outcome measures related to displacement, educational products, and increasing staff capacity to develop affordable housing. While many sites mention developing relationships with equity-oriented organizations, the Seattle application devotes significant space to articulating exactly how a regional equity network would be created and maintained, including a discussion of how the work would be funded. Seattle detailed how they will document TIF alternative options, including discussions with legislators to determine the alternatives’ financial and political feasibility, in light of legislative concerns about TIFs.

Making better regional equity plans. These five regions’ proposals represent the most effective proposals for achieving the standards of equity planning that we lay out in this paper. Their ability to develop proposals with a conceptual framework and activity plan for equity planning demonstrates the possibilities of overcoming barriers and directly addressing equity in regional planning. The plans laid out by these regions offer guides to other regions seeking to plan for equity.

Further, HUD has also provided guidelines and resources for regions. HUD clearly defined equitable land use and linked this program to fair housing concepts. The agency has provided data packages and metrics for equity and fair housing, and clear direction and data sources for how to define regional problems. The agency brought technical assistance on equity planning from national leaders such as PolicyLink and the Kirwan Institute, available to regions as they prepared their grant applications. Some of the more effective regions are doing equitable activities; additionally, other regions, even those not awarded SCRPG, can undertake these activities. For instance, planners could benchmark the program outcomes listed in the NOFA such as social and economic disparities and housing and travel

costs per household. While making a dramatic improvement in these issues will likely involve a regional collaborative effort, planners should not be discouraged by the limited authority of regional institutions such as metropolitan planning organizations. If planners in various jurisdictions, particularly the larger ones, choose to create plans aimed at reducing disparities and housing and travel costs, then over time these issues can be addressed. Here regional planners can build on their own networks to help increase capacity to undertake this work across a region.

We recognize talking about these concepts is politically difficult. HUD continues to be embattled as a federal agency and there is significant pushback against planning in many of the regions seeking SCRPG funding. The proposals suggest little in the way of a political or institutional assessment that would lead to the ability to shift decision making and implement programs. However, opening a discussion of social equity at a regional scale may leave planning agencies vulnerable to political challenges to any regional coordination of planning. It may seem rational for planners to pursue this program’s aim under the auspices of already amenable broader goals, leaving a fuzzy idea of what equity is and who its intended targets are. Further, without continued funding for programs and projects, some regions may not have the capacity or the political will to follow through in sustained ways. The scale of HUD funding to cities for urban development has been greatly diminished from prior decades. The funds available for implementation that can be conditioned on having a regional equity perspective are limited. Were federal transportation funds to be linked more fully to the equitable land use–housing–transportation sustainability concept, that could have much more impact on how regions respond to the initiative.

Conclusions

In this article, we consider the current condition of equity planning, as demonstrated by the HUD Sustainable Communities Initiative’s 2010 Sustainable Community Regional Planning Grant program. The SCRPG offers a unique opportunity to assess the response of regional planning institutions to a federal directive that promotes equity explicitly, provides definitions and target populations, and gives technical assistance for achieving implementation. Considering the Cleveland Policy Plan as the model for equity planning that provides a clear goal—to expand choices for those who have fewest—and policy activities and implementation, we first assessed whether the SCRPG was an equity planning program and then assessed thirteen regional proposals using a plan analysis framework. The regional site proposal analysis included the conceptual framework of the proposals with respect to equity—their goal language and justifications and problem statements as factual bases—and the proposed activities—their specificity, population targets, and implementation mechanisms.

We find that HUD's program does meet the equity planning concept proposed by Krumholz. In the HUD NOFA, equitable land use planning is not only requested, it is clearly defined and incentivized with a grant to support the planning work. However, most regions applying for Sustainable Communities Regional Planning Grants do not use the kind of equity planning language or goal setting that Krumholz found critical to laying a foundation toward implementing equity policy and that the HUD NOFA and programmatic documents emphasized. Quality of life and sustainability remain the primary justifications for the regional planning work of grantees. While the HUD documents link a concrete definition of equity to these justifications, few of the regions did so in their proposals.

Many of the regional plan proposals avoid arguments based in social justice and instead emphasize that addressing equity issues will benefit the region as a whole. Social equity is often related to its potential impact on economic growth or efficiency, rather than to justice for populations who "have the fewest choices." Thus, it is difficult to discern how regions envision social equity and for whom it applies.

This finding of very mixed success on integrating equity is especially concerning for the possibility of advancing regional equity because these grantees have preexisting regional planning relationships and frameworks. Even where there are specific activities discussed, they are activities that have been discussed for decades in urban planning. For instance, increasing mobility and job access for people from marginalized backgrounds was something that planners started advocating for decades ago. Yet, these regions are still *talking* about implementing these ideas and many of them only vaguely point to creating plans and policies, first needing to conduct further studies to assess what might be done. While this might reflect wanting to analyze the situation before making commitments on next steps, when it comes to reports such as identifying the land use regulatory barriers for an analysis of impediments to fair housing choice, the outcomes will likely not be too surprising. It is not hard to imagine what the next steps would be—steps for ending suburban exclusion and removing regulatory barriers to affordable housing has been a focus of HUD efforts for many years. It is difficult to argue that the technical competence is not there: the ability to analyze conditions, evaluate policies and implement known best practices for planning for housing, land use, and transportation jointly.

When the rubber meets the road—when resources must be allocated, projects prioritized, regulations revamped—a regional coordinated approach to equity requires an implementation strategy. Without clearly stating who, how, and what will change practices or reallocate resources to achieve an equity objective, we are not optimistic that equity will be realized. However, we do see indicators that some places can make headway. The potential for equity to become a focus of

regional planning is seen in the proposals that speak to the current conditions of their regions in terms of economic and racial segregation, that clearly define policy work toward addressing specific underserved communities, and that discuss strategies for getting jurisdictions to implement new ideas. We hope that future research into these sites demonstrates that this work successfully laid the groundwork to achieving equitable land use.

Acknowledgments

We would like to thank the regional planners who shared their grant applications with us. We also appreciate the feedback from two anonymous reviewers and the *JPER* editors.

Declaration of Conflicting Interests

The author(s) declared no potential conflicts of interest with respect to the research, authorship, and/or publication of this article.

Funding

The author(s) received no financial support for the research, authorship, and/or publication of this article.

Note

1. The difference in scale between the CPP and SCRGP—city and region—should not reflect on the ability of the regions to plan for equity. Several of the topics from the CPP were regional in scope, regional planning has advanced considerably since the CPP, and discussions about equity and regional planning are pervasive. Indeed, any concerns we can think of about the ability to plan for equity regionally as opposed to at the municipal level, would be concerns for any planning topical area at a regional scale.

References

- Baer, W. C. 1997. "General Plan Evaluation Criteria: An Approach to Making Better Plans." *Journal of the American Planning Association* 63 (3): 329–344.
- Bassett, E., and V. Shandas. 2010. "Innovation and Climate Action Planning." *Journal of the American Planning Association* 76 (4): 435–50.
- Berke, P. R., and D. Godschalk. 2009. "Searching for the Good Plan: A Meta-analysis of Plan Quality Studies." *Journal of Planning Literature* 23 (3): 227–40.
- Bollens, S. A. 2003. "In through the Back Door : Social Equity and Regional Governance." *Housing Policy Debate* 13 (4): 631–58.
- Capital Area Council of Governments. 2010. *Untitled Grant Application for 2010 Sustainable Communities Regional Planning Grants*. Austin, TX: Capital Area Council of Governments.
- Chapple, K., and E. Goetz. 2011. "Spatial Justice through Regionalism? The Inside Game, the Outside Game, and the Quest for the Spatial Fix in the United States." *Community Development* (April 2012): 37–41.
- Chittenden County Regional Planning Commission. 2010. *Untitled Grant Application for 2010 Sustainable Communities Regional Planning Grants*. Chittenden County, VT: Chittenden County Regional Planning Commission.

- City of Cleveland. 1974. *Cleveland Policy Plan*. Cleveland, OH: City of Cleveland.
- Davidoff, P. 1965. "Advocacy and Pluralism in Planning." *Journal of the American Institute of Planners* 31 (4).
- Goetz, E. G., K. Chapple, and B. Lukermann. 2003. "Enabling Exclusion: The Retreat from Regional Fair Share Housing in the Implementation of the Minnesota Land Use Planning Act." *Journal of Planning Education and Research* 22 (3): 213–25.
- Government Accountability Office, United States. 2009. *Affordable Housing in Transit-Oriented Development: Key Practices Could Enhance Recent Collaboration Efforts between DOT-FTA and HUD*. Washington, DC: Government Accountability Office, United States.
- Heart of Illinois Sustainability Consortium. 2010. *Untitled Grant Application for 2010 Sustainable Communities Regional Planning Grants*. Peoria, IL: Heart of Illinois Sustainability Consortium.
- Hoch, C. 2007. "How Plan Mandates Work: Affordable Housing in Illinois." *Journal of the American Planning Association* 73 (1): 86–99.
- Hopkins, Lewis D. 2001. *Urban Development: The Logic of Making Plans*. Washington, DC: Island Press.
- Housing and Urban Development, United States Department of. ND. *Notice of Funding Availability (NOFA) for HUD's Fiscal Year 2010 Sustainable Communities Regional Planning Grant Program*. Docket No. FR-5396-N-03.
- Imbroscio, D. 2006. "Shaming the Inside Game: A Critique of the Liberal Expansionist Approach to Addressing Urban Problems." *Urban Affairs Review* 42 (2): 224–48.
- Imbroscio, D. 2010. *Urban America Reconsidered: Alternatives for Governance and Policy*. Ithaca, NY: Cornell University Press.
- Krumholz, N. 1982. "A Retrospective View of Equity Planning." *Journal of the American Planning Association* 48 (2): 37–41.
- Krumholz, N., J. M. Cogger, and J. H. Linner. 1975. "The Cleveland Policy Planning Report." *Journal of the American Institute of Planners* 41 (5): 37–41.
- Krumholz, N., and J. Forester. 1990. *Making Equity Planning Work: Leadership in the Public Sector*. Philadelphia, PA: Temple University Press.
- Metzger, J. T. 1996. "The Theory and Practice of Equity Planning: An Annotated Bibliography." *Journal of Planning Literature* 11 (1): 112–26.
- Metropolitan Area Planning Council. 2010. *Untitled Grant Application for 2010 Sustainable Communities Regional Planning Grants*. Boston, MA: Metropolitan Area Planning Council.
- MARC (Mid-American Regional Council). *Creating Sustainable Places: A Centers and Corridors Study for Regional Sustainability*. Sustainable Communities Regional Planning Grants. Kansas City, MO: MARC.
- Norton, R. K. 2008. "Using Content Analysis to Evaluate Local Master Plans and Zoning Codes." *Land Use Policy* 25 (3): 432–54.
- Pastor, M., C. Benner, and M. Matsuoka. 2009. *This Could Be the Start of Something Big: How Social Movements for Regional Equity Are Reshaping Metropolitan America*. Ithaca, NY: Cornell University Press.
- Pastor, M., C. Benner, and M. Matsuoka. 2011. "For What It's Worth: Regional Equity, Community Organizing, and Metropolitan America." *Community Development* 42 (4): 437–57.
- Provo, J. 2002. "Planning for Regional Economic Development in Oregon: Finding a Place for Equity Issues in Regional Governance." *Critical Planning* (Summer):55–70.
- Rose, B. K. et al. 2011. *The 2011 Sustainable Communities Regional Planning Grant Guide: How to Incorporate Equity into Your Grant Application*. Washington, DC: Policy Link.
- Sacramento Area Council of Governments. 2010. *Untitled Grant Application for 2010 Sustainable Communities Regional Planning Grants*. Sacramento, CA: Sacramento Area Council of Governments.
- Sandercock, L. 2004. "Towards a Planning Imagination for the 21st Century." *Journal of the American Planning Association* 70 (2): 133–42.
- Woods, C. 2004. "Response from the Author." *Journal of Planning History* 3 (3): 256–60.

Author Biographies

Marisa A. Zapata is an assistant professor at Portland State University. Her research examines the intersections between land-use planning, civic engagement, and racial justice.

Lisa K. Bates is an associate professor at Portland State University. Her research is on housing policy and planning, with a focus on neighborhood change and racial justice.