To:	Environmental Protection Agency
From:	Sara Zimmerman, Public Health Law & Policy
Date:	March 1, 2012
Subject:	Public comment on *Creating Equitable, Healthy, and Sustainable Communities* draft report

Thank you for the opportunity to comment on EPA's new draft report on *Creating Equitable, Healthy, and Sustainable Communities.* These comments contain feedback from myself and six of my colleagues at Public Health Law & Policy (PHLP), including attorneys, planners, public health and green building experts, and policy analysts.[1]

PHLP is a national nonprofit that partners with local, state, and national leaders to develop legal and policy solutions to public health challenges. Drawing upon our multidisciplinary team of lawyers, planners, and policy experts, PHLP identifies where and how law and policy can influence public health outcomes. We work with community leaders, public health departments, government attorneys and others to develop practical tools such as model laws and policies, fact sheets and toolkits, and customized trainings and technical assistance. In addition, we capture and share the learning that comes only through the on-the-ground process of implementing new policy strategies, and integrate these findings into future solutions and support.

Overall, this report provides an excellent overview of the potential use of specific strategies and approaches to achieve the goals of both environmental justice and smart growth. The writing is detailed but clear and cogent, and the analyses are thoughtful and geared toward identifying a variety of practical approaches and strategies. In addition, the detailed case studies provide interesting and inspiring stories and examples. We provide a number of general and specific recommendations below, but it is clear that the report provides a valuable tool for advocates and fills a vacuum regarding the interaction of environmental justice and smart growth.

General suggestions:

- Clarify the scope of the report: The title and some of the language implies a comprehensive review of the strategies for creating healthy, equitable, and sustainable communities, which would include two main areas: (1) how overburdened communities can interact with and use smart growth and equitable development to create better community outcomes without displacement; and (2) how other communities can create equitable and sustainable environments by considering smart growth and the needs of low-income, minority, and tribal populations in tandem. However, the majority of the analysis here is focused on this first issue. We recommend either fleshing out the second question more fully, or crafting the title and contents to explain that the primary emphasis

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[1] PHLP staff who contributed to these comments include: Marice Ashe, Executive Director; Lisa Chen, Planning and Policy Associate; Pilar Lorenzana-Campo, Senior Planning and Development Associate; Linda Merola, Senior Staff Attorney; Scott Watkins, Program Assistant; Heather Wooten, Senior Planning and Policy Associate; Sara Zimmerman, Senior Staff Attorney.

is providing strategies for overburdened communities, with some analysis of how these principles apply to other community planning processes as well. Although it is certainly reasonable to direct this report to overburdened communities, if the report fails to explicitly set out this focus, it feels as though it is letting more affluent communities off the hook by implying that they have little role or responsibility to take action to increase equity.

- Clarify your conclusions regarding the relationship between environmental justice, smart growth, and equitable development: This relationship lacks a little clarity in two regards.
  - First, it's unclear what the basic view of the nature of the relationship is. Are these arenas (a) inherently linked and supportive of each other, (b) capable of supporting each other so long as there is conscious effort invested, or (c) potentially at odds with each other? Aspects of each of these perspectives appear in the document, and it would be useful to understand what the overall conclusion is.
  - Secondly, when each of the three core concepts is described in the Introduction, equitable development is presented as "integrat[ing] environmental justice and smart growth." The ensuing description continues in the same vein, describing how equitable development integrates these perspectives and how key principles of equitable development embrace health, reduction of regional disparities, and economic vitality. But if equitable development is the combination of environmental justice and smart growth, why is the document as a whole working to advance all three goals? Is the real emphasis on strategies for equitable development, with explanations of how such strategies achieve smart growth and environmental justice goals? Or is there something missing from the frame of equitable development, requiring an explicit additional focus on environmental justice and smart growth to avoid missing important issues? It will be crucial to provide more explanation regarding this confusion. We provide one potential suggestion for addressing this issue in whole or in part in discussing the introduction, below.
- Address lessons learned: Consider addressing in this or a future resource the lessons learned and challenges encountered by communities in trying to integrate these perspectives. Often the most valuable aspect of a case study is the ability to learn from the exploratory steps of pioneering communities. Are there particular hazards for unwary community members? The longer case studies are treasure troves of lessons that could be extracted and summarized. The conclusion to the report is a bit terse; perhaps that is the place to incorporate some of these lessons.

In addition to these general thoughts, specific suggestions for each section follow.

Executive Summary

- Consider adding an additional bullet, discussing the challenge of lack of access to housing opportunities in more affluent communities. (Discussed more below, under Chapter 2.)
- Minor point: In your final bullet point under challenges (p. 2), be sure to emphasize that you are discussing difficulties engaging with *government* decision-making, not personal decision-making.

Chapter 1: Introduction

- The descriptions of the three core concepts of environmental justice, smart growth, and equitable development are uneven. The description of environmental justice provides a historical context, a sense of the concept as encompassing a movement, an overview of current related federal policy initiatives, and a sense of the animating principles of the movement. In contrast, the descriptions

of smart growth and equitable development are simply focused on the overall principles, and give no sense of how or why these concepts arose, who espouses these ideas, whether they are enshrined in federal or other policies, and so on. While these descriptions clearly need to remain pithy, the differences in coverage are jarring.

- As mentioned above, it is unclear whether equitable development is the realization of smart growth plus environmental justice, or whether it is a third partially overlapping circle. Why not conclude this section by explaining the relationship head on, and describing how you came to identify the seven common elements detailed in Chapter 3 as the key aspects of these concepts? As the report stands, the reader may find the seven common elements to be convincing areas for focus, but has no sense of how they relate to the 10 smart growth principles or to the descriptions of environmental justice and equitable development. Were these simply the seven ideas that happened to overlap? Or were they an attempt to create a set of principles that captured the key concepts of each while adding in the crucial elements of the other perspectives? Because this is an important aspect of the frame presented, the report would do well to explain this clearly.

Chapter 2: Challenges

- This chapter contains an excellent description of many of the key challenges encountered by overburdened communities. Consider fleshing these descriptions out with statistics and examples to give more of a snapshot of how prevalent these problems are and how these issues are affecting the populations of concern. Clearly, your goal is not to give a detailed and compendious description of how each challenge plays out across communities. But a few statistics or examples could bring these problems to life and highlight the depth of the challenge faced by specific communities due to the issue in question. For example, 41% of Latino parents see safety as posing a barrier to their kids getting enough physical activity, whereas only 9% of white parents have this fear.[2] Likewise, 38% of whites lack sufficient access to nearby parks, but 70% of African-Americans and 81% of Latinos lacked park access.[3] These details help ground the descriptions of the challenges and provide a real sense of the struggles people experience.
- A key challenge that must be added to this list is the challenge posed to healthy and equitable communities by residential segregation, whether by race, ethnicity, or income. This challenge creates barriers for individuals from overburdened communities who want to access the benefits available in other communities, and the effect of these barriers cannot really be overestimated. As crucial as it is to improve conditions in low-income communities, high quality schools and many other key resources are, for the foreseeable future, likely to be available almost exclusively in middle and upper income communities. Unintentionally and deliberately discriminatory housing policies and practices create a fundamental challenge to the ability of people from overburdened communities to access the resources they need to thrive. Moreover, approaching this issue from a different direction, residential segregation also prevents more affluent communities from achieving the overall goal of being "healthy, equitable, and sustainable."
- In the discussion of development patterns (pp. 13-14), there is an under-emphasis on the deliberate discriminatory practices that led to crumbling central cities with populations of color and investment in white suburbs. The failure to discuss this gives the misleading impression that these

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[2] "Physical activity levels among children aged 9-3 years -United States, 2002." *MMWR Weekly, 52(33): 785-788, 2003.* *http://www.cdc.gov/mmwr/preview/mmwrhtml/mm5233a1.htm*

[3] Moore LV, Diez Roux AV, et al. "Availability of recreational resources in minority and low socioeconomic status areas." *American Journal of Preventive Medicine* 2008; 34(1):16-22. Available at: http://deepblue.lib.umich.edu/bitstream/2027.42/57999/1/Availability%20of%20recreational%20resources%20in%20minority%20and%20low%20socioeconomic%20status%20areas.pdf.

patterns just happened to occur. This section requires an explanation of the interaction of race with these trends. Additionally, in listing the effect of exclusionary zoning (top of p. 14), please also discuss racially exclusionary covenants, restrictive business practices, and red-lining. Without this discussion, this section is misleading.

- Avoid using the word "might" in this section. It gives the challenges a theoretical air. Of course the challenges don't always emerge and strike different communities differently, and this can be conveyed by using less tentative words such as "can," "often," or "sometimes."
- A few specific suggestions:
    - Re polluting facilities (top of p. 12), the report mentions that risks from point sources "can be compounded by the fact that ... regions ... do not meet federal air or water quality standards." Why does that occur? Is it caused by the point sources? Is it related to the disempowered nature of the community, or is it simply a common occurrence? Provide a bit more explanation.
    - Re inadequate nutrition (top of p. 13), note not only the lack of access to healthy food, but also the overabundance of cheap fast food. It might also be more accurate to explain that there is a dual negative effect of insufficient supermarkets: residents do often shop at local convenience stores, but also commonly respond by making lengthy and arduous trips on a more infrequent basis to get to grocery stores.
    - Re displacement (p. 15), discuss whether it is common that cheaper rental housing becomes more costly owner-occupied housing. Also, it might be better to rephrase the final sentence. Residents may want to avoid displacement so as to continue participating in revitalization, but surely avoiding eviction and loss of their homes and experiencing the benefits of improvements to the neighborhood are more significant factors.
    - Re text box on climate change (p. 16), consider adding additional problems: as seen following Hurricane Katrina, government assistance following natural disasters is often dedicated to homeowners with little or no assistance for renters; also, such assistance may take so long to arrive that it primarily benefits those with enough disposable income to wait out the process.

Chapter 3: Strategies

- Text box on displacement (p. 18): Mention rent control and other mechanisms to create permanently affordable housing, such as trusts, tax protections, and other policies to create opportunities in perpetuity for low and moderate income residents to live in revitalized neighborhoods. Current discussion focuses on market- based mechanisms, which may be great but are unlikely to suffice to prevent displacement. The report discusses these in more detail in section D, but should provide a good preview since some readers may not proceed methodically all the way through.

Section A: Facilitate Meaningful Community Engagement in Land Use Decisions

In addition to facilitating engagement with residents who have not traditionally participated in land use decision-making processes, consider reaching out to and engaging other public agencies who may not be traditional partners. Public health departments, for example, can play an important role in bringing a health lens to plans and policies, and can bring new stakeholders and information to the table. Because there is such a strong connection between equitable, healthy, and sustainable communities and the work of health departments, we encourage them to play the following roles in developing land use plans:

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- Educate community members and decision-makers on the links between planning decisions and health
- Help residents identify health issues that can be addressed in land use plans
- Organize residents to participate in community meetings, providing training on message development and public speaking
- Organize workshops and presentations for key decision-makers on land use policy and health
- Package and disseminate data documenting/supporting local health concerns
- Provide/interpret relevant health data (e.g., maps correlating health outcomes with neighborhood conditions)
- Provide draft or sample policies, and comment on draft plans

More information on engaging public health stakeholders can be found in PHLP's publications, available at: http://www.phlpnet.org/healthy-planning/participating-planning-process

Section B: Promote Public Health and a Clean and Safe Environment

- The opening paragraph of this section states: "Neighborhoods should be free from pollution…." While this is a laudable vision, it is not entirely accurate since communities (even the most affluent ones) will never be 100% free from pollution. Instead, the bigger issue that could frame this introduction is that of disproportionate impact and the inequitable distribution of environmental hazards. Overburdened populations are briefly mentioned in the second paragraph, but this issue of equity should be made even more explicit in these opening paragraphs.

Reduce Exposure to Hazardous Land Uses (p. 29)
- The first paragraph should be broadened to include hazards beyond those that that affect air quality. Elsewhere in the section there are references to water discharge and waste disposal, but there are additional hazards, such as noise pollution from traffic and industrial uses, and increased risk of traffic injuries and fatalities from trucks. In addition, locating light industrial or manufacturing facilities near housing can create environments that are unpleasant to walk in and lead to a diminished sense of safety.
- This section should also give more weight to what policies environmental justice advocates can do to help existing overburdened, since these communities will outnumber new planned communities for the foreseeable future. The last few paragraphs identify a few strategies for existing communities. Perhaps these should be expanded and brought to the forefront. Also, this section has some undefined terms (for example, "amortization policies to eliminate nonconforming land uses") that should be spelled out for layperson audiences.
- A point about "incompatible land uses": a complete separation of land uses is not always desirable. Here in the Bay Area some cities are actively considering how to preserve industrial land uses intermingled with residential and other uses. San Francisco's "PDR" (production, distribution & repair) zoning designation is one example. The city has recognized the value of saving these multi-use properties, which can serve as facilities for small businesses, light manufacturing operations, and as incubator spaces. The intensive permit review process serves as a protection to ensure that these operations advance the city's economic goals while protecting neighbors from potential harm.
- On page 31 the report states that comprehensive rezoning "requires an updated comprehensive plan." While such rezoning will likely always benefit from an updated comprehensive plan, we

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recommend that you restate this to avoid giving the mistaken impression that this is a universal legal requirement, which it is not.

Reduce Exposure to Goods Movement Activities (p.31)

- This section would benefit from more specific information about how advocates can get involved and the range of agencies and organizations they might need to work with (for instance, transportation, planning, public health, air quality, etc.)
- There should be additional discussion or acknowledgment about the need to work with industry to help them meet these goals. This is especially important in places and industries that are dominated by small, dispersed businesses, which may have a harder time complying with new requirements than large companies.

Clean and Reuse Contaminated Properties (p. 32)

- The case study in this section (pp. 34-35) is fantastic and really highlights the negative impacts of pollution and how to promote the equitable redevelopment of brownfield sites. We would like to see more of this intent reflected in the language of the accompanying text – the second to last paragraph on community involvement could be expanded upon and elevated to the top of the discussion. The language could include recommendations that reuse plans consider how the health, economic, and social benefits be targeted towards the most vulnerable communities and those who have been disproportionately harmed by existing conditions.
- This section also contains a few sentences that appear to slightly overstate matters. For example, the second sentence of the report states that "[w]ith planning and remediation, it is possible to reuse these sites for commercial and industrial purposes, housing [etc]." Since it is not always possible or feasible to sufficiently remediate sites to make them appropriate for all uses, this sentence should be qualified. Likewise, at the end of the second paragraph, the report states that "governments provide support for brownfield cleanup." The implication is that such support is widely or universally available, which should probably also be qualified.

Promote Green Building (p. 36)

- The promotion of green building should encompass more than the building itself. A neighborhood approach to green building, as seen in the LEED Neighborhood Development (LEED ND) rating system, can provide a concise framework for implementing practical and measureable green building techniques on a larger neighborhood scale, which in turn, compound the public benefit of green buildings. Although LEED ND may not be appropriate as a sole criterion for all projects or as a basis for every municipal ordinance and/or state law, LEED ND can be used as a planning tool to emphasize smart growth and equitable development patterns.
- In addition, emerging trends in the green building field, such as carbon neutral and regenerative building, look to not only balance but also offset unhealthy environmental impacts. Green building practices filter and repurpose storm water, purifying air from polluting facilities, and reduce district electrical demands. When implemented on a large scale, communities experience a reduction in upfront installation costs, ongoing operation costs, and improve the long-term health of inhabitants.
- In the first paragraph, we appreciate the discussion of how green building can save money by offsetting long-term operating and energy costs, which disproportionately harm low-income households. However, for the sake of balance, we recommend that the report also acknowledge the other side of the argument – that green building may result in higher upfront costs – and provide recommendations on how to overcome these challenges.

Build Green Streets (p. 37)

- Move paragraph three up (swapping with paragraph two), so that the many benefits of green streets are discussed together upfront, not just storm water runoff.

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- Consider adding a recommendation about green roofs, since these are another strategy to reduce runoff, mitigate urban heat islands, and boost building energy efficiency.
- Also consider a recommendation about "daylighting" creeks and waterways that have been buried, and connecting green streets to existing parks/open space. Green streets that are planned in coordination with the broader network of parks and open spaces can amplify the benefits of water retention/treatment and promote park accessibility.

Section C: Strengthen Existing Communities

- This section does a nice job of linking concerns about environmental justice and smart growth with the goal of strengthening existing communities.
- The paragraphs laying out the organization of this and the following sections are a little confusing (second and third paragraphs on p. 40). Consider numbering the three approaches covered in this section and also differentiating the approaches covered in the following sections.
- In addition to the challenge of vacant properties, there are also sometimes challenges related to occupied but blighted properties. Such challenges can create conflicts between competing interests, for example, existing owners of dilapidated homes or businesses who do not have the resources or inclination to change the status quo, versus others who believe there are strong public health and fiscal reasons to do so. The section portrays the choices a bit too much as cosmetic upgrades or uncontroversial demolition, when in fact, many buildings already are condemned or ought to be condemned, but they still have vociferous owners. This conflict is a hard reality that is highly political and unaddressed.
- A variation on this theme poses a separate problem: in some communities, HUD is reselling abandoned properties to low income residents at little to no cost, but the properties may be contaminated with lead or have other structural problems that create unsafe and unhealthy living conditions. Reuse must also require environmental mitigations and clearance.

Section D: Provide Housing Choices

This section provides a great discussion regarding affordable housing, but mentions only in passing issues around the quality and safety of housing. Perhaps some of the discussion of healthy housing, which appears very briefly in the "Green Building" subsection of Section B (p. 36), could be more tightly incorporated into the discussion of affordable housing in Section D. Low income families are more likely to experience housing-based health problems, and healthy housing should not be created at the expense of affordable housing, so it seems important to link these ideas together. To this end, the final paragraph of the subsection "Preserve Affordable Housing" (p. 47) might elaborate more on the importance of *healthy* affordable housing. Some relevant points:

- Preserving existing housing with attention to environmental justice requires effectively mitigating environmental hazards that exist within residential units and buildings. Rehabilitation and maintenance of housing needs to address an array of in-home health hazards that disproportionately affect low income tenants and homeowners, for example, lead, injury hazards, and asthma triggers.
- The characteristics of healthy housing extend well beyond "roofs, plumbing, and electrical systems in good repair." (p. 47)
- In addition, while healthy housing does benefit homeowners, it is especially critical that healthy housing preservation tools address the physical living conditions of *renters* who are often not

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responsible for or in a position to complete critical building repairs and maintenance. In addition, well maintained housing is more affordable to homeowners *and renters* and represents significant savings in energy and healthcare costs.

- Housing codes that address healthy housing concerns, effective code enforcement for single-family *and* multi-family homes, and protections for tenants that assert their right to healthy housing are all critical backdrops for ensuring equitable development and healthy housing.

The following are links to two articles from the California Housing Partnership Coalition that suggest additional strategies – for a local government audience – for preserving existing affordable housing.

- Section 8 Opt-Out Risk Rises in California: Local Government Solutions
  http://www.chpc.net/dnld/HPN_LocalPreserv_012512.pdf
- Local Preservation Strategies
  http://www.chpc.net/dnld/LocalPrezStrat012512.pdf

Section E: Providing Transportation Options

- The first paragraph of the section states that investments in transit create more jobs per dollar than road building. Consider adding in similar data regarding jobs created per dollar for other types of active transportation infrastructure: 7.8 jobs/$1 million for road projects, versus 10 jobs for pedestrian projects and 11.4 jobs for bike projects.[4]
- In the section on providing access to transportation (bottom of p. 52), consider noting that youth are another key user group of public transportation, whose needs should be incorporated into decision-making.
- Also, discuss the fact that many commute trips require more than one leg often on different forms of public transportation – for example from regional rail onto a local serving bus. For the elderly, young children, or other sensitive populations, linking or connecting public transportation options can increase the likelihood and ease of utilizing public transportation. Connecting various transportation options is not just about coordinating schedules between transit providers – it's about planning transportation hubs or centers where these types of connections are facilitated.
- The section on equitable TOD (pp. 53-55) provides good implementation strategies (reduced parking burden, density bonuses, and land banking), but we would encourage the report to address equity more explicitly. We suggest making a more explicit link between community benefits (affordable housing, access to recreation) and the proposed implementation strategies.
- The section on safe streets for all users (p. 58) provides a nice overview of complete streets and safe streets. It might be worth clarifying one point: complete streets policies generally do not commit a jurisdiction to making existing streets safe for all users. Instead, they state that if and when an existing street is reconstructed, it will at that point be made safe. It is a slow, incremental approach that does not necessary (or generally) impose any extra costs on jurisdictions, but instead requires them to spend money on different things when reconstructing a street – curb cuts and sidewalks instead of an extra vehicle lane, perhaps. However, it is important to encourage jurisdictions to go beyond this methodical pace in improving street safety. Different methods are available for funding street infrastructure improvements (some of which are dependent upon the

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[4] Heidi Garrett-Peltier. 2011. *Pedestrian and Bicycle Infrastructure: A National Study Of Employment Impacts.* Political Economy Research Institute University of Massachusetts, Amherst.

outcome of the federal transportation bill), but localities need to include and prioritize these projects in their transportation priorities.

Section F: Improve Access to Opportunities and Amenities

- In the section on diverse, community-centered schools, it might be worth mentioning not only that centrally located schools can save families money in transportation costs, but also that having a nearby school makes parent participation much more feasible for families that are overstretched, and parent participation is linked to student performance. This would help to spell out the equity benefits more clearly.
- In the discussion in this section on effects of community-centered schools on school diversity, the explanation of the basic challenge and the recommendations for short and long term ways to address the problem are clearly and concisely laid out. We recommend that the report make a few additional points. First, it is worth stating more clearly that the basic challenge to school diversity comes from residential segregation, which is fairly extreme: 86% of white Americans live in a community with less than 1% people of color. As mentioned earlier, promoting residential integration is an important goal for equitable communities generally, and such strategies bear particular fruit in the context of diverse and walkable schools; we encourage reiterating this point here. The discussion of steps that districts and municipalities can take is very good. The report may want to mention that school districts can affect this arena not only through decisions about school siting, but also through decisions about student assignment policies and attendance boundaries. More information and tools are available at: www.nplanonline.org/nplan/healthy-school-siting (materials available and more forthcoming shortly).
- This section also alludes to community use of schools (p. 59). The report could benefit from providing some additional information, examples, and details on how to open existing schools up for broader community use through joint use agreements, (especially since this process doesn't always naturally unfold, even when a school is centrally located). Joint use agreements can be created between schools and city parks and recreation departments or other local public agencies, or between schools and community groups like Boys and Girls clubs. Such agreements allow school facilities like playgrounds, libraries, kitchens, and community gardens to serve not only students and teachers but the community as a whole. More information on creating joint use agreements, include model agreement language and case studies is available at: www.phlpnet.org/healthy-planning/making-schools-healthier
- In the section on Safe Routes to School, the report accurately mentions that more low-income children already walk to school, but that they are often dealing with serious infrastructure dangers. The report may also wish to discuss the fact that for Latino children, rates of walking fall off with indicia of acculturation (this may be true for immigrant children more generally). Culturally appropriate SRTS programs can be designed to maintain healthy habits as acculturation occurs.
- Another point the report may want to emphasize about SRTS is that improved infrastructure and more families walking and biking to school benefit the community as a whole: more pedestrians mean that streets are safer from crime and from collisions.
- In the section, "Provide Access to Healthy Food," the report could benefit from a more robust discussion of the specific planning barriers and opportunities for creating access to healthy food for all residents. For example, the report indicates that it is primarily grocer's perception of lack of spending power in low-income urban communities that prevents new food retailers from opening in underserved areas. While this is one important factor, there are many challenges to attracting food retailers that planners can take action to address, such as identifying suitable sites for grocery

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stores and assembling land (if needed), linking supermarket operators with financing for development and ongoing operations, and providing workforce development programs to ensure residents are trained and qualified for new jobs. And, it's not just urban communities that suffer from a lack of convenient access to healthy food retailers: low income rural communities also face challenges that should be acknowledged here. More information on steps planners and healthy food advocates can take to bring supermarkets to underserved neighborhoods can be found in *Getting to Grocery*, available here: http://www.phlpnet.org/healthy-planning/products/getting-to-grocery

- The report may also want to acknowledge communities that are working with existing, small retailers (like corner stores, bodegas, and convenience stores) to provide healthier options. These small retailers often represent a big opportunity: they may be already operating in underserved neighborhoods, and their small footprint makes them easy to fit into a walkable, neighborhood fabric. However, small stores also face challenges in offering healthy food, including outdated and inefficient refrigeration equipment, lack of knowledge about how to source, stock, and market produce and other healthy items, or business models that rely on alcohol, tobacco, and junk food sales. Healthy corner store projects are underway around the country; zoning, licensing, transportation and economic development policies can support these initiatives. More information on healthy corner stores can be found here: http://www.healthycornerstores.org

- Additionally, existing planning policy and regulations often create substantial barriers to establishing healthy food resources like community gardens, mobile produce vendors, and farmers' markets. Because zoning and permitting regulations often fail to acknowledge these activities, they may be subject to expense and lengthy conditional use permit applications, or be outright illegal. Planners should review and amend their local plans and codes to actively promote healthy food resources. For more information on model zoning codes and permits for a range of healthy food activities, see: http://www.phlpnet.org/healthy-planning/creating-healthier-food-environme

Section G: Preserve and Build on the Features that Make a Community Distinctive

- This section alludes to the role of public spaces in a community's culture but focuses mostly on strategies such as design standards or neighborhood conservation districts that preserve the architectural character of a place. The section describes the need to identify the range of spaces that support a community's cultural identity but it doesn't offer any strategies to protecting and building on those spaces in strategies that follow. The report would benefit from providing some examples of strategies to protect and build on existing cultural assets, such as parks, community centers, civic spaces, and activities. The case study describes using a master plan to help protect culturally important natural surroundings and public plazas; this is the type of strategy that could be incorporated into the text.