

# PRRAC

## *Poverty & Race Research Action Council*

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To: Environmental Protection Agency  
From: Philip Tegeler, Executive Director, PRRAC  
Date: March 9, 2012  
Re: “Creating Equitable, Healthy, and Sustainable Communities”

We are writing to briefly comment on the EPA draft report, “Creating Equitable, Healthy, and Sustainable Communities,” and the relationship between environmental justice, smart growth, and equitable development, as it affects low income communities of color. Overall, the report is impressive and addresses many important and unexplored points. However, we are concerned that the report fails to adequately address the challenge of our continuing legacy of residential racial segregation in the U.S., the ways in which segregation undermines the goals of smart growth and equitable development, and the importance of developing strategies and policies that promote desegregation and meaningful access to communities of opportunity for all low income families.

It is important to note that the EPA, when it is operating in the area of housing and urban development, and in particular when it is working in partnership with its sister agency HUD, is bound by the 1968 Fair Housing Act’s mandate to “affirmatively further fair housing” (AFFH) set out in 42 U.S.C. § 3608, which is a broad legal obligation to avoid policies that perpetuate segregation, and to affirmatively expand racial and economic integration.

We have addressed the relationship of these AFFH obligations and HUD’s Sustainable Communities Initiative in a widely circulated May 2010 report, *Building Sustainable, Inclusive Communities*,<sup>1</sup> attached and incorporated by reference in these comments. We urge you to review this report in revising your final report. Policies which continue to isolate low income families of color in marginal communities and high poverty schools are simply not consistent with smart growth and equitable development principles. We have also reviewed the intense connection between residential segregation and health outcomes for low income families of color in a 2008 report to the United Nations, *Unequal Health Outcomes in the United States*,<sup>2</sup> which we also hope that you will consider in developing the final report. We also commend to your attention the 2008 final report of the National Commission on Fair Housing and Equal Opportunity, *The Future of Fair Housing*,<sup>3</sup> which addressed the relationship between fair housing and smart growth in some detail.

Thank you for the opportunity to present these comments.

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<sup>1</sup> <http://www.prrac.org/pdf/SustainableInclusiveCommunities.pdf>

<sup>2</sup> <http://www.prrac.org/pdf/CERDHealthEnvironmentReport.pdf>

<sup>3</sup> [http://www.civilrights.org/publications/reports/fairhousing/future\\_of\\_fair\\_housing\\_report.pdf](http://www.civilrights.org/publications/reports/fairhousing/future_of_fair_housing_report.pdf)