

U.S. Comments on Habitat III Issue Papers

The United States appreciates and supports the efforts of the Habitat III Secretariat in sharing the Habitat III Issue Papers and asking for comments at an early stage in the process of developing the “New Urban Agenda.” The United States encourages the Secretariat and the Policy Units Technical Experts to continue to be transparent and inclusive in this process, and to consider and address comments, criticisms, and suggestions from United Nations member states and other organizations. Such a process will enable the development of a clear, actionable New Urban Agenda to help drive development in an inclusive and sustainable manner in this century of unprecedented urbanization.

The U.S. Habitat III preparatory process is a broad and inclusive one, recognizing the importance of broad and bottom-up participation around issues of housing, inclusive communities, and sustainable development. Inputs from a variety of government agencies as well as civil society stakeholders were actively solicited and considered in preparing these U.S. comments to the Habitat III Issue Papers.

The United States recognizes that these Issue Papers are an early input into the process of developing the New Urban Agenda. As no specific guidance was given about how to solicit or structure feedback on the Issue Papers, the United States decided to undertake a high-level review, focused on (1) highlighting major gaps and making recommendations of major items that should be included within the given topic, and (2) identifying particular items discussed in the Issue Papers for which we offer strong support.

The U.S. comments on the Habitat III Issue Papers include a number of general comments that are cross-cutting or apply to all Issue Papers, followed by comments specific to each paper. All comments are provided without priority or preference with respect to the order of comments. In keeping with the U.S. approach of conducting a high-level review, comments on each Issue Paper are organized under two sub-headings: “Support” and “Gaps/Recommendations.” Comments under the “Support” sub-heading are those themes or issues within a particular Issue Paper for which the United States wishes to clearly affirm support for inclusion. Comments under the “Gaps/Recommendations” sub-heading are for those themes and issues that the United States specific recommendations or has identified a gaps in the Issue Paper.

General Comments:

- All Issue Papers should consider the different development contexts of countries, from the most advanced to the least.
- Concepts and terms should be clearly and precisely defined.
- The concept of inclusion within all Issue Papers should embody the concerns and needs of all groups and minorities, regardless of race, color, national origin, legal status, sex, religion, presence of children, sexual orientation, gender identity, and age including youth and the elderly.
- Discussions of human rights obligations and commitments should accurately capture them as rights belonging to individuals or persons, and not to “groups.”

- References to particular human rights obligations or commitments should use agreed terminology from the Universal Declaration on Human Rights (UDHR) or from international human rights covenants, such as the International Covenant on Civil and Political Rights (ICCPR) or the International Covenant on Economic, Social, and Cultural Rights (ICESCR), rather than attempt to abbreviate or alter this agreed terminology. Throughout these documents, concepts should not be referred to as “rights” or “human rights” unless there is a source of those rights found in an international covenant or the UDHR. Attempts to expand or contract the definitions or scope of existing human rights obligations by enumerating new elements or requirements of these obligations should be avoided.
- Participatory approaches with local groups and stakeholders should be encouraged across all Issue Papers – in traditional as well as innovative ways.
- Beyond simply raising topics and challenges, there is a need to discuss and develop solutions – including a range of approaches that could be applicable to different contexts; policy, process, and design solutions; and specific examples and lessons learned.
- Given the breadth of many of these topics, there should be a focus on how they manifest themselves and are addressed in the urban context – considering spatial as well as policy implications – and how these issues might tie into focus areas of Habitat III and the New Urban Agenda.
- All Issue Papers should include a discussion of the roles, responsibilities, and opportunities of sub-national actors, local governments, not-for-profit organizations, and civil society partnerships in addressing these issues.
- Terms such as “rights based model,” “rights based approach,” and “rights based framework” lack clear internationally agreed definitions and should be clarified using terminology with clearer meanings: for example, a “framework or model that promotes, protects, and respects human rights.”
- States have the primary responsibility for promoting and protecting the human rights of all individuals in their territory. While development facilitates the enjoyment of all human rights, it should be clear that lack of development should not be invoked to justify the abridgement of internationally recognized human rights.

Issue Paper 1: Inclusive Cites

Gaps / Recommendations:

- Define the framework of inclusion - both across issue areas and geographies – and specify how this issue is considered.
- Inclusivity should include the concerns and needs of all groups and minorities, regardless of race, color, national origin, legal status, sex, religion, presence of children, sexual orientation, gender identity, and age including youth and the elderly.
- Focus on how the issue of inclusivity plays out in the urban context – and with particular attention to spatial inequality.

- In addition to policies, include processes and physical design solutions that can promote inclusion such as design elements and approaches for better accommodating the elderly or persons with disabilities.

Issue Paper 2: Migration and Refugees in Urban Areas

Support:

- Support discussion of the need to link the issues of refugees and internally displaced persons with those of the larger and static local urban planning framework.
- Support discussion of need to include refugees and internally displaced persons in the local decision-making processes and involve them in efforts to build their own resilience.

Gaps / Recommendations:

- Include a discussion of the need for metropolitan areas to assess and plan for environmental and geopolitical risks and events that may lead to migration and displacement.
- Urban planning approaches and documents should contain contingency plans that can provide a framework for humanitarian aid both preemptively and in times of need.
- The discussion of local hazard exposure should consider not only natural hazards but also possible man-made hazards as well as the need for assessments of biological, chemical, or radiological risks in the area.
- Recommend highlighting the need to incorporate emergency response and disaster response with disaster risk reduction and urban development more broadly, especially in light of the needs of migrants and refugees.
- Recommend drawing greater connections and coordination with the work of humanitarian and development aid efforts serving these vulnerable populations.
- Legal distinctions between different types of migrants, internally displaced persons, and refugees and any applicable international obligations should be accurately captured.

Issue Paper 3: Safer Cities

Gaps/Recommendations

- The issue of safety within cities is intrinsically linked to other urban issues and sectors, including poverty, segregation, discrimination, access to jobs with living wages, access to quality education and health care, etc. Both broad approaches and specific solutions to fostering safer cities need to be discussed and evaluated in light of these linkages.
- The term safety is often meant to include the concept of security, but these two terms are not interchangeable. Safety refers to protection from harm due to an accident or negligence.

Security, on the other hand, refers to protection from harm caused on some deliberate action. The focus of this Issue Paper is on urban violence and crime (security).

- Consider including a discussion on urban safety issues such as traffic and pedestrian safety, public health-related safety concerns (e.g., exposure to asbestos, lead paint, pathogens, etc.), and political safety (e.g., terrorism, violent extremism, government oppression, etc.).
- In the discussion of innovation, consider including a discussion of managing criminal justice costs and reinvesting savings in ways that address underlying causes of criminal behavior, including the innovative use of data and partnering with community and youth organizations.
- The issue of high rates of violence against women, although mentioned under facts and figures, should be elevated throughout this Issue Paper and in the work of the relevant Policy Units.
- Cross-sector and community-based programs to address safety and combat violence should be discussed.
- The built environment, historic development patterns, and housing and urban planning policies, including those influenced by federal or local development policies, have all contributed to residential segregation by socioeconomic status, religious affiliation, race, and ethnicity, which have led to increased crime and violence. These issues should be discussed.
- This paper should address the risk of terrorist violence and the essential role cities can play in countering violent extremism, including efforts to address its drivers (e.g. radicalization, recruiting, etc.) and to prevent violent extremism by improving the social, political, and economic inclusion of populations at increased risk of marginalization and radicalization to violence. Whole-of-society efforts at the grassroots level are required, including collaboration between local authorities, law enforcement and security officials, parents, educators, social workers, social service providers, religious leaders, and community organizers.

Issue Paper 4: Urban Culture and Heritage

Support

- Support discussion in Issue Paper highlighting the value of preserving cultural heritage as an important source of resilience for local communities, e.g., post-conflict, etc.
- Support discussion in Issue Paper highlighting “cultural diversity ... as a powerful way to mitigate urban conflicts, foster tolerance, preserve social fabric, and promote pluralism.”

Gaps/Recommendations

- The urban culture and heritage of a city and region has inherent value that is independent of and not limited to the monetary tourist value of that culture and heritage. This inherent value

of urban culture and heritage should be recognized and discussed in this Issue Paper and should not be completely overshadowed by its associated commercial value.

- Given the inherent value of urban culture and heritage, which extends beyond the boundaries of the city or region itself, where local resources are not sufficient to fund preservation efforts, the Issue Paper should consider other scenarios for funding local preservation efforts, e.g., from national governments, international donors, not-for-profit organizations, etc.
- The Issue Paper noted a growing trend among cities to rely upon cultural tourism as the core of their urban development strategies. The Issue Paper should include a discussion of the benefits of working regionally with other cities to coordinate a broader strategy for cultural tourism and the potential perils of excessive competition among cities for tourism revenue.
- The Issue Paper should share approaches for, and examples, of how the preservation of urban culture and heritage can help support the creation of higher skill, higher wage jobs.
- The Issue Paper should discuss the challenges of providing adequate affordable housing within the context of preservation.

Issue Paper 5: Urban Rules and Legislation

Gaps/Recommendations

- There is a need to recognize the wide range of different country and legal contexts, including levels of authority and vertical legal relationships (national/federal, state/province, local/municipal, neighborhood), which should be acknowledged and discussed accordingly.
- Include discussion of the important role of the rule of law in creating and fostering effective institutions, which are equipped to build knowledge and address urban issues.
- There is a need to provide clarity around, and support for, the concepts of simplified, fewer, or “essential laws” – or re-phrase the discussion. For example, assertions that zoning, a foundational tool for land use regulations, should be introduced at later stages of governance are inaccurate or overly simplified. Basic zoning regulations to ensure safety and protect residents, especially the elderly and children, schools, and hospitals from proximity to heavy industry and man-made risks are an urgent priority. More nuanced zoning can be established later.
- The Issue Paper should consider how legal frameworks can facilitate inter-agency and cross-sector coordination.
- In addition to effectiveness, the quality of laws should also be assessed based on equity and efficiency in the local context.

Issue Paper 6: Urban Governance

Support

- Generally support the points discussed in this Issue Paper, including the need for capacity building programs as mentioned.

Gaps/Recommendations

- Public private partnerships, as mentioned, do provide opportunities for cities and are increasingly an integral part of urban governance; however, the Issue Paper should include a discussion of the potential risks, tradeoffs, and limitations of relying on outside funds for the provision of basic and critical public services.
- The roles and responsibilities of the public sector need to be discussed with regards to innovative frameworks, including public-private partnerships.

Issue Paper 7: Municipal Finance

Support

- Support the discussion of value capture instruments as an important piece of municipal and infrastructure finance.

Gaps/Recommendations

- The Issue Paper should include a discussion of the trade-off between the risks and benefits of public-private partnerships, including costs, efficiency, and the need for continued and equitable provision of critical services and public goods. This Issue Paper should further discuss who assumes risk in such arrangements.
- The Issue Paper should recommend use of alternative funding to push innovative ideas and approaches rather than to fill basic gaps.
- The Issue Paper should discuss appropriate use of tax incentives in economic development, given the associated costs for communities and municipal finance in terms of lost revenue.
- The Issue Paper should discuss the capacity needs of municipalities to be good fiduciaries of public funds.

Issue Paper 8: Urban and Spatial Planning and Design

Support

- Support the recognition of the importance of local capacity for creating and implementing plans.

Gaps/Recommendations

- The Issue Paper discusses and provides statistics on the environmental impacts of sprawl, but fails to discuss the host of other urban socio-economic challenges related to sprawl. It should

include a discussion of sprawl as it relates to segregation – both economic and racial – and social mobility.

- The Issue Paper mentions the role of public participation; however, it should be stressed that public participation is an important essential part of every step of the urban/spatial planning process to ensure inclusive, sustainable, and resilient communities.
- The discussion on limiting zoning needs to be further explained or developed, including an explanation of the benefits (e.g., safety, preservation, environmental, planning, etc.) and drawbacks (e.g., overly strict and/or complex regulations, encouragement of distinct uses and/or segregation, etc.) in different contexts. The Issue Paper seems to assume that zoning means exclusion. However, zoning can also support mixed-use and mixed-income development – and can be deployed to promote inclusion across a range of issues.
- Land use regulation, and zoning in particular, determine the type and intensity of use of privately and publically held land and is thus a driver for action. These should be discussed in greater depth in this Issue Paper, as well as the important role of local governments in local land use regulation and decision making.

Issue Paper 9: Urban Land

Support

- Support the call for advance planning to help mitigate sprawl, unsustainable land use, tenure insecurity, and slum development.
- Support encouragement of participatory and inclusive approaches to finding solutions.

Gaps/Recommendations

- Recommend including discussion of broader issues including foreclosure, gentrification pressures, and tenancy rights in high-income as well as developing country contexts.
- Recommend discussion of downsizing of cities, both intentional and not, including post-industrial cities with severe population loss, urban vacancy, and rightsizing strategies.
- The Issue Paper should include a discussion of economic decline and urban blight.

Issue Paper 10: Urban-Rural Linkages

Support

- Support the statement that, rather than competing for scarce resources, the discourse between urban and rural areas needs to evolve towards understanding the synergies that can be leveraged from urban-rural coordination, especially in light of globalization.

Gaps/Recommendations

- Under main concepts, the definition should also include the flow of other services beyond ecosystem services, e.g., health services are disseminated from cities to rural areas through a number of mechanisms.
- This Issue Paper focuses too much on the topic of food waste. While an important issue, food waste is a peripheral issue in the context of urban-rural linkages and urban sustainability, especially if the discussion focuses strictly on food waste and not larger food systems.

Issue Paper 11: Public Space

Gaps/Recommendations

- Issue Paper needs to balance the creation and preservation of public spaces with the need to ensure adequate planning for affordable housing and other community services.
- Gentrification is presented only as it relates to the improvement of property values; however, the benefits of gentrification should be shared with those living in the community prior to the changes. In addition, the negative externalities of gentrification need to be examined more fully, specifically those related to the displacement of urban poor from communities with rich social fabrics.
- The strengthening of legal frameworks to protect public space is necessary and presents a challenge for less developed, developing, and developed countries alike. The Issue Paper should examine these challenges in more depth, including the similarities and differences in the types of challenges faced and how to address those challenges, including providing specific recommendations.
- The Issue Paper needs to discuss more fully the critical issue of free and open access to public spaces and/or the lack thereof, including the equality of access to public spaces based on race, socio-economic class, etc., and also the issue of appropriation of traditional public spaces, e.g., market places, etc., by the private sector. The latter concept was mentioned, but needs to be expanded.
- The definition of public space needs more clarity and consistency. Further, the percentage of land allocated to streets is not a good measure of public space or inequality.
- The Issue Paper briefly mentions the issue of safety in public spaces, but does not adequately address this critical topic.
- The Issue Paper should discuss recent creative approaches to creating dynamic public spaces around the world – often through informal channels – as well as how cities and towns can work with citizen-driven initiatives.

Issue Paper 12: Local Economic Development

Support

- Support the value of high quality institutions in strengthening local economic development as well as the need for capacity building at the level of local government.
- Support local economic development as a participatory approach, building on local resources and competitive advantages, to create resilient and sustainable metropolitan areas with decent jobs and stimulating economic activity.

Gaps/Recommendations

- Paper focuses mainly on local economic development (LED) as an instrument for national economic growth; however, it should also discuss how LED can and should also promote more (economically and socially) inclusive and (environmentally and fiscally) sustainable cities.
- This topic needs to consider the residents of metropolitan areas and their participation in the local economy more inclusively – incorporating women and youth as well as migrants, immigrants, and racial and ethnic minorities, and empowerment of small businesses and small business groups.
- Cities should promote an integrated and collective impact approach to local economic development rather than endorsing individualized and silo efforts at tackling urban issues. In the effort to integrate local economic development into a city's infrastructure, cities need to make sure efforts are aligned under the same vision in order to yield the greatest impact.
- Successful local economic development highlights the need for regional approaches and urban-rural linkages – as well as providing a means for strengthening regional cooperation.
- Recommend careful consideration of appropriate use of tax incentives in economic development, given the associated costs for communities and municipal finance in terms of lost revenue. Tax policy and regulatory relief should be responsible and sustainable to ensure sustainable benefits for communities.
- This Issue Paper should discuss the important role of infrastructure investment to economic growth and job creation. This includes the physical infrastructure and policy frameworks – as well as workforce development. Furthermore, investment should include protection and reinvestment of current infrastructure.

Issue Paper 13: Jobs and Livelihoods

Support

- Support the concept presented in the Issue Paper that there are great opportunities in the better integration between national economic policies and the economic development policies of cities and towns in support of jobs and employment.
- Support the statement expressed in the "Key Drivers for Action" section of the Issue Paper that employment is at the core of sustainable urbanization and should be integrated into urban policies, including developing new spatial forms of cities and investing in education and skills linked to the labor market.

Gaps/Recommendations

- Investing in the development of younger entry-level workers presents a long-term solution to urban poverty and contributes to civic engagement, inclusive cities, and a resilient urban economy. The inability of younger persons to access entry-level jobs creates a roadblock to urban development.
- In addition to younger persons, resources need to be made available to re-train older and/or displaced workers. The inability of older and displaced workers to re-enter the workforce creates a risk to the development and maintenance of a strong, inclusive, and resilient urban economy.
- The Issue Paper fails to address or adequately address a number of important topics, including labor unions and the rights of workers to representation and to negotiate on their own behalf, occupational safety and health protections, including the right to non-hazardous working conditions, and other health and social protections that contribute to a healthy and productive workforce.
- The discussion in the Issue Paper of gender equality and women's empowerment should also include a discussion of legal rights guaranteeing equal treatment, pay, and other labor protections.
- The Issue Paper should also discuss the needs and concerns around empowering small business development.

Issue Paper 14: Informal Sector

Support

- Support prioritizing key spatial solutions and planning for social inclusion as listed in the “Drivers for Action.”

Gaps/Recommendations

- Refer to the International Labour Conference Provisional Record from the 104th Session, Geneva, June 2015: 10-1: Fifth item on the Agenda: The transition from the informal to the formal economy.
- This is a broad topic, and these issues should be related more directly to issues of housing, sustainable and inclusive urban and metropolitan development, and metropolitan economies.

Issue Paper 15: Urban Resilience

Support

- Support the broad list of urban hazards presented: natural, technological, and socio-economic-political-cultural crises. Encourage the range of shocks to be further discussed.

- Support discussion of addressing natural hazards, particularly flooding – and encourage such attention be given to addressing other shocks and disasters in greater depth as well.

Gaps/Recommendations

- Cities and metropolitan regions not only should undertake risk assessments, but also should develop standards for assessing and managing environmental, social, technical, and economic risks. Such standards help identify risks before they emerge, and ensure accountability, transparency, and progress toward achieving urban resilience.
- There is a need for better partnering, knowledge sharing, and integrating efforts both vertically and horizontally. This is critically needed between different levels of government, from local to national, as well as between local and state governments and industries, particularly those with expertise in internal emergency management plans, preparations, risk-reduction activities, and rescue operations.
- Consider that all shocks are not disasters, and if planned for appropriately, the risks or shocks themselves can create opportunities for improvements from small-scale change to transformational development.
- Discussion of urban resilience should include more in-depth discussion of the broader range of risks and shocks.
- Issues of funding and financing for shocks and disasters, man-made as well as natural, should be discussed, ranging from dedicated disaster/emergency funds at the country or municipal level to insurance options and humanitarian aid.

Issue Paper 16: Urban Ecosystems and Resource Management

Gaps/Recommendations

- There is a need to discuss approaches and solutions that support both the environment and development – and the needs of the local communities.
- There is a need to discuss how to effectively establish, manage, finance, and run systems to maintain and conserve ecosystems, which provided ecosystems services. Principles of collective action and traditional ecological knowledge should be considered.
- There is a need to discuss the importance of context-specific solutions, recognizing that top-level general ideas can lead to inappropriate or less than ideal actions being implemented at the local level.

Issue Paper 17: Cities and Climate Change and Disaster Risk Management

Support

- Support the statement that "cities are traditionally laboratories of new technology and innovation". Cities often do lead the way on both mitigation and adaptation. There should be

an emphasis on both allowing and encouraging cities to move forward with climate change solutions faster than countries and also on looking to cities for scalable practices.

Gaps/Recommendations

- This Issue Paper and others do not discuss the large amount of physical area that is expected to be urbanized by 2030. Expected climate change impacts must be seriously factored into decisions about where new development is directed and infrastructure is planned and constructed. These issues should be discussed in this Issue Paper and others, within discussions of disaster risk reduction and/or mitigation, spatial planning, and infrastructure.
- One of the likely outcomes of climate change impacts, such as shifts in climate zone/agricultural productivity, inundation, etc., will be increased migration into cities. This Issue Paper should discuss that issue, including the challenges associated with such migration.
- The Issue Paper discusses planning for compact cities, in particular, as a key driver of action to advance disaster risk reduction and climate change solutions. While at a high level and in the aggregate, encouraging compact cities may align with other climate change solutions, it should be noted that the emphasis on compactness as a solution is not accurate if the location of the compact city itself is vulnerable or susceptible to climate change impacts.
- It is worth noting that considerable variation exists in conditions at local levels and given local contexts, especially in large and/or diverse countries, which presents challenges for national policies that are too specific.
- The Issue Paper should consider both the pros and cons of regulatory and voluntary or incentive-based approaches to both mitigation and adaptation.
- The scale at which data is collected and analyzed is a major issue for planning at the city and metropolitan level. Data is usually collected at the global or regional level. However, there is considerable variability in climate at the local level (e.g., rainfall amount, intensity, temperatures, etc.), which make it hard for cities to plan accordingly. This is true in both developed and developing countries. There is a need to consider how to provide accurate local level data, especially for the developing and rapidly urbanizing country context.

Issue Paper 18: Urban Infrastructure and Basic Services, including Energy

Support

- Support the idea that there is a need to change the focus from a reactive one to a proactive one both in terms of natural disasters, as mentioned in this paper, but also more broadly considering expected population and urban growth.
- The Issue Paper provides an effective framework for discussing and analyzing infrastructure systems, i.e., that they consist of three components: assets, knowledge, institutions.

Gaps/Recommendations

- The process for planning and evaluation of infrastructure investments need to include a comprehensive benefit-cost analysis that incorporates the negative externalities borne by both other government agencies and the larger community.
- Planning for urban infrastructure needs to consider the issue of equity; urban planning and development policies should ensure that all citizens can equally/fairly access and benefit from the provision of infrastructure investments.
- The Issue Paper may want to consider and/or discuss how humanitarian aid organizations can contribute their efforts in ways that not only provide immediate relief, but also help assist in constructing larger infrastructure.
- The Issue Paper should discuss opportunities for multiple benefits from single investments – both as a principle and in providing guidance and examples.
- Private sector involvement can be an effective way to provide public sector resources and infrastructure; however, care must be taken to ensure adequate and continued provision of services in times of disruption, disaster, economic downturn, etc.
- Green infrastructure is one piece of the larger infrastructure conversation, but it should not be overly elevated nor should it diminish the need for major infrastructure issues to be resolved, including the need for normal investment in infrastructure expansion and maintenance and the need to strategically locate infrastructure to drive development in ways that can provide larger benefits.
- The paper does not discuss the need to develop and implement processes for the evaluation of the environmental effects of infrastructure construction projects themselves and to minimize and mitigate the environmental impacts of those projects.
- In the context of urban infrastructure and basic services, there are notable gaps of issues not included or adequately discussed, including energy, food security and nutrition, and nexus issues, such as food, water, and energy.

Issue Paper 19: Transport and Mobility

Support

- The statement in the Issue Paper that "a divergence is seen between modal use, infrastructure allocation and modal funding in many cities" is accurate. Beyond examples, the paper should discuss how to re-align funding and shift investments in ways that are feasible.

Gaps/Recommendations

- The report makes reference to the cost-prohibitive nature of public transportation for many people ("...spend as much as 29% of their income on public transport"). There is a gap in the commentary regarding how urban centers can make public transit more affordable or subsidize fares for those who need assistance the most. Addressing both affordability and equitable

access is critical for the "mobility" piece of this issue paper and could factor into the "Financing" or "Focus on Demand" sections.

- Using transportation as a way to promote community development is one example governments and stakeholders may consider to foster inclusive cities and sustainable economies. Transportation can be incorporated into local economic development initiatives to maximize community development for a particular city. Housing-transportation linkages are critical. For example, a transit-oriented development, or TOD, project can connect a geographically isolated community to the broader regional economy and become a hub for economic opportunity.
- The statement in the Issue Paper that "[t]he objective should be to curb sprawl, create compact, walkable neighborhoods and reduce vehicle kilometers travelled per capita" is misguided as the major goal. Rather, the objective should be to enable safe, affordable, and efficient transport that fosters mobility and meets the needs of people. Urban design and transportation are means to achieving that end, not the end itself.
- The Issue Paper states the need to focus on the poor. Accessibility for the poor is an appropriate concern and topic to discuss in this paper. However, in the end, the paper does not address the issue of accessibility for the poor. Further, accessibility and access to transportation is necessary for all urban residents. The reasons for this are many, including that impacts on the economy can be felt both by middle and lower income residents and that demographics of neighborhoods can shift over time, as in the case of U.S. inner-ring suburbs.
- Under "Focus on Demand," the discussion in this Issue Paper also needs to recognize that people still need to move across and around cities, regardless of how walkable the city is or whether it contains TOD neighborhoods. Furthermore, the need for private vehicles will still exist; considering how that may change should be a part of the dialogue (not excluded).
- Travel demand management can lead to greater inequality and restrict mobility and access to lower income persons. The Issue Paper should both recognize and discuss the fact that revenue generated from road congestion and demand pricing is regressive and can prevent lower income residents from accessing better employment opportunities as well as other critical community resources (e.g., healthcare, education, etc.).
- Beyond TOD, there is a need for more focus on access and mobility and appropriate planning to ensure linkages to housing, jobs, healthcare, schools, and other community resources.
- The Issue Paper should include some discussion of inter-city transportation (as related to both rural-urban and urban-urban linkages) as well as intra-city transit.
- The Issue Paper is too directive in saying that Travel Demand Management has to be a main part of the strategy and set of policies for providing adequate urban transport. Mobility brings benefits. The goal should be to accommodate demand so as to provide safe and affordable transport that provides access to jobs, etc. Providing transportation alternatives that are more sustainable and fostering demand for those alternatives (e.g. by making them safe and affordable) should be the focus.

- In general, the importance of safety needs to be elevated in importance in this Issue Paper. The Issue Paper should include discussion of the relative safety and efficiency of different travel modes.
- While briefly mentioned, the discussion of goods transport/freight needs to be expanded, in particular the comparative advantage of different modes by distance, type of goods, etc.
- The statement that “[p]olicies should be made to make car travel less appealing” is again misguided. The focus should be on the intended outcome, providing safe, affordable, and efficient transport that meets the needs of people.
- Economic sustainability of transportation systems is critical. Planning for transportation projects should consider initial capital investment requirements, operating costs, and all life-cycle costs. Planning needs to include benefit-cost analysis, but such analysis need to consider all externalities and internalize external costs in order to fairly evaluate potential projects.

Issue Paper 20: Housing

Gaps/Recommendations

- The paper correctly calls for greater care and transparency over subsidies; however, this necessitates a broader discussion of recommendations beyond more subsidies.
- The call for better linkages between housing, urban planning and infrastructure is critical. However, in addition to the call for a more participatory and inclusive process, there needs to be clear overarching policy consensus and mechanisms to implement them in an environment of good governance.
- The paper should consider both the developed and developing country context.
- Issues of housing affordability and segregation need to be further developed.
- The focus of the paper is on needs and challenges; however, there is a need to discuss different approaches that governments, civil society, and private actors are undertaking and what we've learned from them.
- There is a need to look at trends, more than simply static conditions to understand both those conditions, the role of government interference, and differences across countries.
- The Issue Paper should include a discussion of the role of not-for-profit organizations and civil society partnerships to provide affordable rental housing and services.
- The Issue Paper should further develop discussion around the role of the private sector – both broadly defined and specifically in terms of private developers.

- The concept of housing as a platform for household stability – financial, social and otherwise – is implied but should be more explicitly stated and thoroughly discussed.
- There is a need to distinguish between, and not conflate, the concepts of inadequate housing and affordable housing.
- A range of issues that have arisen from the recent financial and housing crisis should be discussed in depth, including not just the provision of mortgage credit, but also the importance that such credit is available when supported by sound underwriting and risk management practices.
- New data sources and measures – such as the data collection efforts underway that overlay social and economic data on satellite imagery – should be discussed around the issue of dearth of data pointed out in the paper.
- Beyond access to credit and the provision of housing, there is a need to discuss the effects of concentrated poverty and low-income housing – as mixed income-neighborhoods provide better outcomes for children living in poverty.
- The Issue Paper should discuss the need for cities to integrate affordable housing into existing community issues, such as public health, jobs, safety, and public space. Amalgamating housing with other social necessities eliminates silos and maximizes impact. Connecting issues including public health promotion and jobs to housing addresses multiple needs and promotes holistic approaches to community development.
- The Issue Paper should further develop discussion around strengthening capacity of local governments, development finance institutions, financing and implementation of responses, and encouraging innovative and more inclusive housing finance systems.

Issue Paper 21: Smart Cities

Gaps/Recommendations

- There is a lack of clarity or consensus on what is meant by smart cities in this paper. Several competing definitions are presented while others are omitted. The supporting Issues and Drivers for Action are likewise broad, unfocused, and at times contradictory.
- The path to developing a smart city requires a holistic and all-encompassing approach that includes improving a city's public services, ensuring government accountability and transparency, mitigating environmental and political risk, and creating new opportunities and a more inclusive city for all. Cities must develop multi-leveled and different, but collective, strategies driven by data indicators that lead to improvements in health, social, and economic progress.

- Municipal governments and stakeholders must pursue multiple strategies that address a range of issues in order to develop a sustainable and smart city. This kind of approach will lead to a healthier economy and inclusive society that creates opportunities for all.
- Technology is a means to an end; whereas a large focus here seems to be simply on getting/using the technology itself - instead of critically considering where it should be used, how, and to what ends - as well as where it is best to use traditional or mixed approaches.
- It is unclear what the benefits are of labelling a city as “smart,” what the metrics are for defining a city as such, and why recommendations would be different for “smart” and non-“smart” cities.

Issue Paper 22: Informal Settlements

Gaps/Recommendations

- There is a need to discuss regional or national policies and approaches to addressing the challenges of informal settlements in peri-urban areas and across metropolitan regions.
- Larger issues of environmental justice need to be addressed.