

URBAN IMPACT ASSESSMENT IN PUBLIC POLICY PROCESSES: THE CANADIAN RECORD, 1968-1982

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Introduction

Decades of research by geographers, economists, regional scientists, sociologists, planners, political scientists and public administrators in Canada and around the world have confirmed and reconfirmed several fundamental understandings about the urban domain:¹

- The "urban problem" is a tightly wrapped *ensemble of problems* (for example, congestion, sprawl, pollution, unemployment, crime, anomie, poverty, housing shortages, high costs, poor delivery of social services, loss of park and prime agricultural land, obsolescent manufacturing firms and industries) which are integral, non-separable parts of the process of urbanization.
- "Urbanization" refers to the *growth of urban centres* (towns and cities) and to *increases in the proportion of the population residing in urban centres*. As such the urban and urbanization field of inquiry extends well beyond the narrow purview of "municipal" concerns.
- There is an intimate, two-way, *producer-product*² relationship

¹There are literally thousands of books, journal articles, newspaper pieces, and governmental and non-governmental memoranda and reports which could be referenced in these regards. Of those many supporting documents, the following are offered as being illustrative of what has been written about the "urban problem" and the "process of urbanization": [2;4;6;7;13;16;18;19;20;22;27;29;31;34;35;36;37;40;41;42;47;48;49;53;55;56;57;66].

²"Producer-product" is used in the scientifically strict manner developed by Ackoff [1]; at a less rigorous and more "popular" level the term "cause-effect" is frequently used.

between the performance of urban places and systems of places on the one hand, and the performance of governments and systems of governments on the other. That is, the (actual or potential) performance of urban places directly affects what governments can achieve, and is directly affected in turn by government processes and interventions; and, conversely, the performance of governments directly affects what urban places can achieve and, in turn, is directly affected by the processes (such as urbanization) and manifestations (gain/loss of industries, increased/decreased pollution or congestion, aging/renewing of the population or housing stock, etc.) of urban places.

Accepting, then, that the urbanization process is an integral, interwoven part of the fabric of a region or country, it is important to assess that phenomenon (urbanism/urbanization) in associated policy and program contexts for both societal and scientific reasons.

The *societal perspective* is particularly significant in Canada, in part because this country is highly urbanized, but even more so because governments at all levels are highly interventionist with respect to all aspects of development (economic, social, institutional, technological, environmental). Hence it is appropriate to assess public policies (and programs) from the point of view of what they do for society: are public policies relevant and responsive to societal needs and wants?; are they formulated, administered and delivered (in a program sense) with due regard for effectiveness, efficiency, economy (in the sense of spending *as little as necessary* to achieve goods and services objectives) and related criteria?; and, if not, why not, and with what consequences in terms of unnecessary benefits foregone and costs or losses incurred?

As for the *scientific perspective*, scientific progress and, ultimately, societal progress is denied and threatened by unnecessary or inadvertent returns to "square one" when decision or action situations surface. In this regard "non-scientific" returns to square one pertain to both subject matter and methods/techniques, and are frequently and perjoratively referred to in terms such as "re-inventing the wheel," "fishing expedition," "repeating mistakes of the past," and "a solution in search of a problem." For the simple and obvious reason, therefore, that urbanism and urbanization processes are pervasive in their presence and influence throughout Canada, scientific inquiry, at least as it is pursued in this paper, is not of the "ivory tower" variety.

It is appropriate at this point to introduce urban impact assessment (UIA), not only because it is a relatively new line of inquiry, but primarily for two more substantive reasons: First, urban impact assessment is conceptually and operationally different from the more familiar, related fields of activity known as urban policy analy-

sis or urban policy research, and that distinction should be defined and confirmed at the outset. Second, much of the remainder of the Introduction, and indeed of the paper in general, documents a record of public sector intervention in the urban domain where the diversity and magnitude of failure is of massive proportions. Early reference to UIA, therefore, should not only induce the reader to consider what UIA can help us to learn from the past (why and how could public policy process have been modified to produce more benevolent outcomes?) but should also precipitate thinking of a forward-looking nature (why and how could/should UIA be incorporated in an "ex ante" as opposed to "ex poste" manner in public policy processes?).

Briefly, urban impact assessment differs from urban policy research (or policy analysis or urban impact analysis) in one very fundamental respect. While the latter approaches are concerned in varying degree with the basic "who, what, where, when, why, and how," UIA contains an explicit evaluative component regarding the consequences of public policy processes and associated (policy and program) interventions.

Compared to the impact analysis approach, for example, impact assessment goes beyond measuring the outcomes of interventions, and even beyond attempting to gain an understanding of the whys behind the hows or the hows behind the whys [52;59]. Hence, urban impact assessment incorporates both the conceptual and the operational components of conventional "inquiring systems" as intermediate steps towards the formation of evaluative, goal seeking determinations about "urban" consequences of public policy processes and ensuing interventions. (And, of course, in such larger contexts as the societal one, the outputs yielded by the UIA approach would in turn become inputs to broader impact assessment study domains.)

To return to the joint societal-scientific perspective, the following observations (more fully developed in subsequent sections of the paper) summarize the state of Canada's "affairs urban" in both 1968 and 1982, which bound the time period under consideration:

- No explicit or implicit government policy or statement of a public nature, federal, provincial or local in origin, exists with regard to national settlement pattern goals and objectives.
- No federal department rigorously and systematically evaluates the impacts of its sectoral policies (and programs) on either regional or national systems of urban centres.
- No federal department (or agency) is responsible for rigorously evaluating or fully coordinating the impact of federal policies (and programs) on individual urban centres, much less on regional or national systems of such centres.
- No documentation, cabinet-issued or otherwise, exists which

instructs or guides federal line departments with regard to respecting or incorporating any aspects of the urbanization process in the formulation, implementation and evaluation of sectoral policies (and programs).³

- Only a few provinces even casually pursue development policies which are cognizant of and sensitive to what urbanization processes mean to those policies, and vice versa.
- Urban centres, which not only have their internal development programs and projects to worry about, but which also are the final and basic link in the delivery of senior government programs, are routinely (ignored and) precluded from federal-provincial meetings.
- No comprehensive models of national (or even regional or provincial) scope exist whereby policy variables with direct and indirect urban impacts can be assessed in the context of those impacts; nor are there any models of national (or even regional or provincial) scope which can incorporate urbanization process variables in their more macro-structural, spatial, or functional contexts.
- No *accepted* frameworks exist for guiding or governing basic land use principles and practices between and among governments on a national or province-by-province basis.
- The Federation of Canadian Municipalities (Federation of Canadian Mayors and Municipalities in 1968) presents a non-influential profile and presence as the national organization representing local governments (towns and cities) in general, and urban places in particular.

At a more specific level, one which is more likely to be recognized and understood by those who do not appreciate the overall significance of urbanization processes, consider the following 1968-1982 commonalities:

- In spite of Canada's ranking as one of the most urbanized countries in the world, no federal urban agency (department or even secretariat) exists; we have no non-government urban policy or research institute of national stature; and related provincial government agencies are for the most part very narrowly defined municipal affairs units.

³Unless specified otherwise, and only in the interest of saving space, future references in this paper to policy or policies include a program or programs component; hence, for example, "in its associated policy context" should be read as "in its associated policy and program context."

- There is no forum or mechanism in place whereby the three levels of government (local, provincial and federal) seriously discuss on a regular basis circumstances and situations which bear on urbanization processes and urban systems at either national or provincial scales.
- The capability of local governments, particularly those of municipalities with populations in the 1,000-100,000 range, to manage and plan their affairs, including the delivery of senior government programs, is largely inadequate [12].
- Federal programs in general, for reasons attributable to over-extension and excessive intervention at the operational levels by federal agencies, impose administrative and "forced-fit" difficulties on local governments to the point of rendering many programs ineffective, counter-productive, or inefficient.⁴
- Provincial strategies, or preferences, or policies related to either growth or development of urban places receive irregular and inconsistent attention from sponsors and intended recipients alike.
- The fiscal capacity of municipalities, tied to the (real) property tax, and to the "generosity" of provincial governments with regard to grants, is so constrained and constraining that local governments are virtually precluded from initiatives which have any long-range or major structural/functional change implications.
- There is no comprehensive, national information system providing data on urban land and near-urban land; rather, there are bits and pieces of such a system along sectoral lines (land allocated to housing, from Statistics Canada, for example), and on a non-compatible, non-integrated, city-by-city or province-by-province basis.
- The federal government is pressured because both owner-occupied and rental housing units are in inadequate supply; mortgage interest rates are caught up in a world trend to higher rates; cost of serviced land is increasing relative to most commodity indexes; and social housing programs (yet in search of guiding policies) miss the point made years ago

⁴A recent statement to this effect, and similar to dozens, indeed hundreds, of similar observations about a variety of federal agencies reads in part, "... The CMHC is stringent and often contradictory; it tells the co-op to do all the planning, yet it imposes its will at every stage of the project ...": "New housing won't meet needs, Eggleton says," *The Globe and Mail*, November 23, 1981, 5.

[8:16;46:22-37] that income support programs are undoubtedly a more effective and efficient means than public housing projects if the poor are to overcome their shelter problems.

- Land use abuses, precipitated on many occasions by urbanization, range from misallocations (scarce, prime agricultural land is used for roads, housing, airports, industrial sites, commercial centres, etc. when land of lesser quality was equally available), to malpractices (inland lakes and rivers, sources of both potable water and food, and places of recreation, are polluted directly and indirectly by effluent or run-off from factories, fields, garbage dumps, waste disposal sites, etc.).
- Federal transport policies neglect to reflect inter- and intra-urban realities and needs to be met by ground transport systems.

In brief, in both the general and specific respects, there is a remarkable degree of "déjà vu" or commonality between Canada's urban state of affairs in 1968 and in 1982. "Plus ça change, plus c'est la même chose." If ever the argument was to be made, therefore, that the flux of history is cyclical rather than progressive [15:28], the "process" of urbanization in Canada would be an overwhelmingly persuasive case in point. This, however, should not mask the fact that in the fourteen-year study period there have been significant urban-related changes. These include changes associated with 1) both problems *in* urban places and problems *of* urban places [27:14-18]; 2) the ways and means of dealing with those problems; and 3) "outside" forces or events which have dramatically altered the nature of the urbanization process. Some of the more notable of these changes are:

- The formation and disbanding of the federal Ministry of State for Urban Affairs (1971 and 1979, respectively).
- The rush of migrants and immigrants to large cities in general and Ontario in particular in the late 1960s and early 1970s and, in the late 1970s and early 1980s, a shift away from those centres and Ontario to smaller communities in general and Western Canada in particular [16:21;33;39;42].
- The dramatic change from relatively cheap energy of all types, indiscriminately used for all purposes, to relatively more expensive energy use with a much higher degree of rationality of purpose. In this latter regard, increasing attention came to be focused on energy cost and security of supply as factors influencing urban form and function in both the built and to-be-built aspects of urban places and systems of places [38].

- The changed attractiveness from suburban to downtown location for commercial development or redevelopment.
- A steady if not pronounced shift away from the private automobile to public transit systems.
- A marked decline in growth (as opposed to development) in larger centres to the point where growth, or the avoidance of decline, is being actively pursued in most such centres across Canada.
- A marked change from freeway or expressway construction spending to expenditures to maintain those facilities.
- A distinct lowering in levels of inter-urban passenger service provided by trains, and dramatic reductions in expected demand for inter-urban travel by air.
- A dramatic increase in "environmental awareness" in the company of economic growth and urban expansion, and an equivalent loss of environmental enthusiasm in the face of declining economic activity, although past and present environmental damage continues to accumulate.
- A marked and vital high-to-low shift in public participation in the preparation, evaluation, implementation and monitoring of plans at the neighbourhood, community and regional levels.
- A grudging but increasing admission by senior governments, and particularly the federal government, that assumptions of heroic proportions underlie most notions related to effecting major structural or functional changes to either the urbanization process or systems of cities.

It would, of course, be excessive, indeed erroneous, to attribute all or even most of the above and other aspects of urbanization solely to public policy initiatives and processes.

The private sector, through its locational decisions and activities, is a major force with respect to the character of urban form and function over time and space. This holds at the local scale and frequently at the regional and national scales as well where enterprises have interurban and interregional involvement in the production, transportation and consumption of goods and services. The magnitude and variety of this involvement-cum-influence is amply demonstrated by reference to such activities as industry (primary, secondary, tertiary), commerce, transport, housing construction, and telecommunications, which are essentially within the purview of the private sector and which have been taking on an increasing urban presence over the past several decades.

Further, citizens, through their choices of where they live, work,

shop and recreate, and through the levels of service (social, educational, recreational, administrative) that they demand from their governments, have a direct and continuing impact on the nature and quality of life provided by their urban environments. In a related and often overlooked vein, it is also the citizenry which is ultimately responsible for the quantity and quality of "governance" (management, planning, operations) accorded both their own urban centres in particular and regional/provincial and national systems of urban centres in general.

On the evidence, however, it appears that Canada's lack of progress towards resolving *problems of and in* urban places, or systems of urban places, is due primarily to failures (or weaknesses) in public policy processes; as will be argued, those failures are due in large measure to the primitive state of urban impact assessment rationale and methodology in public policy processes.

At the time of this writing there are indications that officials in the federal government, and in a number of provincial governments, are aware of the need for an institutionalized urban "sensitivity" either within the federal government or shared among levels. Possibly, if some of the events noted above can be regarded as the "pilot study," "pretest" and "trial run" stages of practical research design [1:Ch. X], then maybe we are on the threshold of a new "urban affairs" awareness and, subsequently, of an agency, secretariat or unit which is appropriate to urban circumstances and needs (e.g. a National Urban Council [27]).

The Urban Public Policy Process in Context

Any overview of the Canadian record with regard to urban impact assessment - what is done, how, why, by whom and the consequences of the activity - must take cognizance at the outset of four key considerations.

Political/Intergovernmental Dictates and Influences

Canada's tri-level system of governance (federal, provincial, municipal); the provincial government's constitutional responsibility for the affairs and actions of local governments; an increasingly interventionist stance by *all* governments over the past 30 years in virtually all elements of the Canadian fabric (economic, social, environmental, technological, financial); and a two-decade surge of urbanization combine to create an urban milieu which is laced with and wrapped by numerous, intricate linkages involving legislation, policies, programs and administrative procedures [65;2;16;18;19;34;49].

Clearly, then, reference to and commentary on urban impact assessment in public processes must be tendered *circumspectly*,

because of the pervasiveness and complexity of political/inter-governmental connections inherent in all manner of initiatives and outcomes throughout Canada.

Temporal Window of Urban Interest

The period 1970-1980 was *the* decade when Canada's "urban profile" was most prominent, for reasons suggested above and for reasons of a structural, functional and planning nature. Due to the magnitude and intensity of urban-related activities and events experienced or spawned during this period, it warrants singular attention by students of urbanization. This paper extends back to 1968, however, because events⁵ between 1968 and 1970 precipitated a number of direct or indirect results throughout the 1970s; it reaches forward to the beginning of 1982 to ensure currency of findings and observations.

Spatial/Structural/Functional Composition of the Settlement Network

There are on the order of 7,000 settlements in Canada. They range in size from two agglomerations of several million persons (Montreal, Toronto) to the many hundreds of centres with populations numbering in the dozens or hundreds; in density from those of the two dozen metropolitan areas to those of vast tracts which are sparsely settled; and in function from centres which are fully or partially diversified to some 600 resource-based "one-industry towns." Further, the majority of the 1,600 "urban" centres (roughly, 1,000 population or larger) are located in a band 150 miles wide, along Canada's southern border, in a country that measures more than 4,000 miles (N-S) by 5,000 (E-W).

With regard to the distributional, structural and functional dimensions of settlements in Canada, then, *variety* of site and circumstances are characteristic; this poses a strong methodological, technical and financial challenge to efforts to mount and maintain capabilities and processes for conducting policy impact assessment.

⁵Reference here is to reports, meetings and discussions which combined to "popularize" urban and urbanization topics in Canada during that period. Of particular influence, almost in a critical mass sense, were the Economic Council's *Fourth Annual Review* [10], the Federal-Provincial Conference on Housing and Urban Development (1967), the (Hellyer) Task Force on Housing and Urban Development [34], and the Canadian Federation of Mayors and Municipalities Conference on Urban Transportation (1969). It is emphasized, however, that selection of the 1968-1982 temporal window by no means diminishes the importance of such "building block" works on that of Beecroft [2], which in 1964 contained a number of significant policy statements which still retain their currency.

Status of Awareness/Understanding

The informational/technical underpinnings of urban impact analysis [57;38;5;17;19;32] (as opposed to assessment) were just beginning to emerge prior to 1970 in Canada, and were largely university-based. During the decade of the 70s, however, Canada underwent a crash course in "affairs urban" (problems, prospects and circumstances related to such topics as housing, transportation, finance, information flows, demography, social services, pollution, environment, renewal, and their casual or causal interdependencies, became prevalent matters of discussion) with much of the impetus coming from the negative experiences of U.S. cities in the 1960s, and an *expanded program presence* of the Canadian federal government in cities and towns across the country.

As a result, then, of Canada suddenly becoming immersed in a wide mix of urban "happenings," a telescoping occurred; virtually no time was available for considered reflection about lessons learned, nor was there the *measured* evolution of a collective state of mind which engendered *thinking* urban before *doing* urban, much less *measuring* change brought about by design or by accident. The extent to which things just happened, often due to ignorance as well as to expedience, cannot be over-emphasized in terms of the status of policy impact assessment processes as they relate to urban development in Canada in the 1968-1982 period.

With the preceding remarks providing a context, the remainder of this part of the paper reports on formal and informal policy impact assessment processes. Since the political/intergovernmental dimension had such an overwhelming influence on urban matters during the past decade, the discussion is organized by level of government.

Urban Policy Assessment Processes by Level of Government

There are many perceived and real differences among the three levels of government concerning both the subject matter of urban impact assessment, and the essence of assessment processes. As a result of that intrinsic divergence, inter-level comparisons of urban impact assessment *UIA* are of limited reliability or utility. Consequently, the materials which follow are clearly indicative and categorized, rather than summary and generic, with respect to both the subject matter and the processes associated with *UIA*.

Urban Impact Assessment Processes: Federal

Official or formal impact assessment processes are taken throughout the paper to mean those which are announced, evaluable, and verifiable according to specified performance measures [50:4]. Based on this interpretation, the Government of Canada record has in

general been sorely lacking, particularly with regard to such processes associated with direct or indirect urban impact assessment. One organizational case in point serves to establish the latter argument conclusively for the period when the Ministry of State for Urban Affairs (MSUA) existed, and a different situation realistically might have been expected.

In 1973 the federal Cabinet created the Senior Inter-Departmental Committee on Urban Affairs (SIDCUA), with the Urban Affairs Secretary as Chairman. Committee members, at the deputy-minister rank, were from such central agencies as the Privy Council Office and Treasury Board, and a number of line departments (e.g. Regional Economic Expansion, Transport, Public Works) to a total representation of fifteen senior executives. Their task was to review and coordinate the development of federal urban policy and the implementation of programs, and to report back to Cabinet annually through the Urban Affairs Minister.

The SIDCUA initiatives fell far short of Cabinet intentions, however:

- The Committee, *despite a Cabinet instruction* to meet for the purpose of reviewing and coordinating urban policy development and program implementation, *held no meetings whatsoever* in 1974, 1976, 1977, 1978 or 1979.
- In spite of a *Cabinet directive* that the Committee produce an Annual Report, that condition was met only twice, partially, through *documents that were never upgraded beyond draft status* (September, 1975 and April, 1976).
- The Urban Affairs Minister *never* formally reported to Cabinet about SIDCUA.

In large measure (and SIDCUA is the case in point "par excellence"), official or formal policy assessment processes related to urban impacts existed in principle, but in practice were virtually non-existent during the period when the federal government had an institutionalized presence (MSUA) in the urban domain!

The entire story about "failed" urban policy processes of a formal nature is not accounted for, however, by reference just to activities internal to or under the authority of Urban Affairs. As French establishes overwhelmingly [14], deep and widespread divisions and incongruities among even the "venerable" Central Agencies -which he refers to as the Finance Planning System, the Treasury Planning System and the Cabinet Planning System [14:25] - were largely accountable for there being "entirely too many priorities, objectives, policy thrusts, priority problems and so forth for any single, stable and coherent picture to emerge" [14:56].

One obvious, if unintended, interpretation to be drawn from

French's work, is that while the Urban Affairs initiative may be characterized as yielding an "indifferent" outcome [14:76], that level of performance was very much consistent with that of the federal government itself during much of the agency's existence. In other words, the failing of MSUA is no more and no less than a manifestation of the federal government's singular lack of success in the 1970s in achieving policy coherence in general, and in the urban domain in particular.⁶ In reality, then, notions about formal urban impact assessment in federal policy processes were destined to be at best no more than neutral, despite a Ministry presumably dedicated to ensuring (formal) urban impact assessment in and of federal policy processes.

Conversely, however, *informal* policy impact assessment processes associated with urban impacts are best characterized as numerous and diverse practices and activities in search of a principle. In this regard, informal processes are considered to be those which are unannounced, non-evaluable, and frequently ad hoc and disjoint. Further, they tend to be characterized as being research - or project-oriented, and under the auspices of persons who are neither policy decision-makers nor decision-takers.

Indicative of the informal policy process related to UIA, then, were such research projects as MUPIM (Macro-Urban Program Impact Model) and IIPS (Inter-Institutional Policy Simulator), the 1976 UN Human Settlements Conference, bi- and tri-level national and regional meetings and conferences sponsored by or involving Urban Affairs and its officials, and interdepartmental committee work involving a half-dozen federal departments. Clearly, UIA of an informal nature was a popular policy topic in the 1971-1979 period.⁷

⁶For discussion of the Urban Affairs policy, research and coordination mandate and activities see any of the agency's *Annual Reports* (available from Canada Mortgage and Housing Corporation, Ottawa). The suggestion by French that the agency was disbanded as a significant budget-cutting act [14:149] is hardly realistic, as the staff complement by 1979 was less than 200 persons and the operational budget was in the range of several million dollars. On the other hand, suggestions of a constitutional "sensitivity" were factually groundless ("urban" is not "municipal" à la the BNA Act), and no evidence has ever been produced to support any claim of serious objections by, for example, provincial governments, to MSUA policy, research and coordination activities. Program concerns are, on the other hand, a completely different matter.

⁷A cursory examination of *Annual Reports* produced by MSUA would reveal the wide-ranging scope of activities in which the agency and its officers engaged. What would not be reported, however, would be the numerous unofficial or informal meetings and exchanges which were critical aspects of the agency's policy, coordination and research function. As a result, judgements about MSUA which are based just on activities or outputs which are visible or countable (such as dollars spent) would seriously err in terms of evaluating operations, output, or impacts and effects.

For a number of reasons, including subject matter and process complexity, political realities and rivalries (intergovernmental and interdepartmental) and weak or uninspired leadership by the Central Agencies and at MSUA, synergism with respect to UIA barely surfaced. Parts remained parts, a critical mass was not reached, no UIA *discipline* ensued. The legacy more resembles, therefore, missed rather than realized opportunities. Bluntly put, the federal government up to 1979 was devoid of any generally accepted, established, and adhered-to processes with respect to policy impact assessment of an urban character.

As for urban impact assessment in policy processes between the disbanding of MSUA and the present, some information has been acquired in that regard. The instrument of inquiry was a letter sent November 5, 1981 to fourteen federal ministers,⁸ the text of which read in part as follows:

Dear Minister:

In the interests of accurately reporting on the *track record and plans* of the Government of Canada in general, and your department in particular, I request a copy of material which satisfies the following criteria:

1. Contains an explicit *urban* or *urbanization* component referent (urban and urbanization refer to the towns and cities of Canada as well as of other countries);
2. Makes explicit reference to *impact assessment* (or, useful but less desirable, cost-benefit analysis, impact analysis, evaluation);
3. Documents the nature of the operant *policy process*, that is, formal or informal; and, only where appropriate (1, 2, 3 above),
4. Provides information about program impact assessment (approaches, methods, techniques and findings), which led to policy modification or confirmation."

The letter resulted in written replies from most offices, and also a number of telephone conversations. As might be expected, given the contents of preceding pages, the inquiry did not lead to neat, clear declarations. Clearly, to even begin to fully sound out and report on the status of urban impact assessment in federal policy processes, an investigation of considerable scope and depth would be

⁸Ministers contacted represented the following agencies: CMHC/Public Works (Cosgrove), Transport (Pépin), Energy (LaLonde), Agriculture (Whelan), Environment (Roberts), Employment and Immigration (Axworthy), Communications (Fox), Industry, Trade and Commerce (Gray), Regional Economic Expansion (De Bané), Indian and Northern Affairs (Munro), CIDA/External Affairs (MacGuigan), Finance (MacEachen), Economic Development (Olson), Supply and Services (Blais).

in order. Unfortunately, there is no Canadian equivalent to the U.S. effort of Glickman [17] nor, apparently, given the ministerial responses, any recent versions of earlier efforts by the Government of Canada [9].

In terms of replies and exchanges now on record, several general observations from the first-cut sampling can be made. Federal attention to urban impact assessment in the policy process (from formulation to evaluation and confirmation or modification) ranges from non-existent to scanty, and the level of awareness ranges from error-prone to limited.⁹ Indeed, in several cases, the word "absurd" appropriately describes the content of questions of clarification asked, statements made, or materials sent, Consider:

- Several agency spokesmen called to learn the meaning of the words "urban" and "urbanization."
- Several agencies sent only *project* reports, including those which were just at the proposal stage.
- One agency claimed to be "currently reassessing its position with respect to urban policies and programmes" (this after an intervention of major urban consequences - the VIA rail passenger service cuts - wherein urban impact assessment was admittedly ignored, according to another agency spokesman), and then begged off providing information for reasons of "confidentiality"
- One Minister proposed that I meet with a number of his officers to talk, the clear implication being that there are no guidelines or even known precedents in place.
- Several agency packets of only marginally-related materials were put together by information officers, none of whom had ever been party to a policy activity of any kind.
- And, as the "coup de grâce," one Minister's signature endorsed an enclosed report [38] which, apparently unbeknownst to the Minister, had been developed using unattributed materials prepared by this writer on urban impact assessment [64].

At this point it may be worth emphasizing that the inquiry was not beyond the purview of the departments contacted, and hence the overall low quality of the replies was appropriate to the circumstances. To quote part of the response from the Office of the Minister

⁹Since space limitations preclude elaboration of original and follow-on replies to inquiries made, and additional findings will likely occur through letters of thanks which will also call for elaboration of a number of statements in the replies, it is intended that a paper be prepared which more directly and thoroughly deals with the state of present, federal UIA.

of State for Economic Development, "While many of the policies and programmes of departments in the Economic Development envelope impact on urban centres, information on these impacts should be requested from the departments directly concerned." According to one Central Agency, then, there were grounds for expecting to receive documentation that was actually relevant to the inquiry.

The one reply¹⁰ received which had any sense of urban awareness was based in content on the "Federal Policy on Land Use," a product of the agency. (One other agency acknowledged awareness of the land use policy.) That same reply (not by the Minister) observed, among other things, "As I understand what you are seeking (Urban impact assessment, as in the U.S.), there is nothing as such in Canada. Nor am I aware of any efforts towards such a policy since the demise of MSUA and the decline of CMHC."

In order to summarize the Government of Canada's performance in urban impact assessment in public policy processes for 1968-1982, a two-word descriptor appears to be accurate and appropriate: grossly inadequate. And that judgement is all the more worrisome because great, scientifically-based advances were made in that period to our knowledge about the role of the urban problem and urbanization processes in a country's progress or lack thereof.¹¹ Clearly, by denying or ignoring those scientific advances, the federal government has denied or stalled realization of important, associated societal advances.

Urban Impact Assessment Process: Provincial

In spite of their constitutional responsibility for municipalities, pro-

¹⁰The reply and materials from Regional Economic Expansion, which arrived too late for inclusion in the text and references section, also reflect urban awareness. A thorough reading will be required to confirm the early impression that UIA is neither formally nor informally incorporated in the agency's policy on program process. Relevant materials not included in the *References* section are: Regional Economic Expansion, "Submission to the OECD Joint Project Group Examining the Coordination of Urban and Regional Policies" (Working Paper status only), Ottawa 1981; and, *DREE Development Agreements*, Ottawa, 1981.

¹¹It is beyond the intent or scope of this paper to fully enumerate these, but the following are indicative: the human, social and monetary dysfunctions or diseconomies of big cities and large metropolitan areas; the disproportionately higher indexes of traffic congestion and environmental degradation associated with increasing density; the mutually-reinforcing interdependencies of contributors to the "urban problem"; and the like interdependencies of policy and program thrusts to resolve the "urban problem," where the phenomena of concern range from housing or serviced land shortages to loss of farmland to too rapid growth to lack of jobs to inadequate transportation facilities. For additional information in this regard see, for example [11;12;16;17;21;37;38;41;49;55;57;59;62;66].

vincial governments parallel the federal government in one important aspect of formal policy assessment processes: in very large measure *sectoral as opposed to urban* issues, concerns, problems and prospects are accorded priority, both politically and bureaucratically. Hence, electoral campaigns, and policies and programs are invariably based on the economy (industrial strategy, jobs, subsidies, etc.), the environment (acid rain, toxic waste disposal), energy security and prices, supply and cost of land and housing, and so forth, but no *packages* are put together.

It has not been the rule, therefore, for *urban* impact assessment processes, or even urban impact analysis, to be instrumental in shaping provincial government initiatives. There have been exceptions to that general statement, however, and they warrant noting. (References to Planning Acts, Environmental Assessment Acts, Municipal Acts are excluded from this discussion largely because they are more legislative and regulatory instruments than elements affecting or affected by policy (impact) assessment processes.)

Each provincial government negotiated a General Development Agreement with the Government of Canada (the exception was a Comprehensive Development Plan for PEI), as well as other bilateral areal and sectoral Subsidiary Development Agreements, in the 1970s [45]. While the urban domain is prominently referenced in many of the various Agreements, even to the point of discussing processes and means for assessing policy impacts, there is a major shortfall: definition of and adherence to *formal* policy assessment processes, in general or in an urban context, did not advance much beyond declarations of intent.¹² Impact assessment, if done at all, was case-by-case or situation-by-situation in nature, poorly documented, and yielded few lessons learned of a transferable nature.

Beyond such proposed, expressly urban thrusts were, of course, numerous other sectoral, federal program initiatives. Provincial responses to those efforts ranged from establishing or speculating a *municipal* link so as to reject federal involvement, to the extending of arguments to urge a continued or expanded federal presence.¹³ In large measure, however, provincial assessments of impacts arising from federal initiatives in the urban domain tended not to get

¹²It has been learned through personal communications with a senior member of a DREE regional office that efforts to institutionalize formal policy assessment processes are being attempted at present, and that an urban component is involved. However, as of this writing no reports are available for public consideration. In the meantime the DREE headquarters orientation remains at the job creation level.

¹³As noted by William McCarten and others in Wellar [62], "have-not" provinces can and do go to great lengths to secure financial assistance regardless of source, or strings attached, or implications related to dependency upon such funds.

beyond politics and dollars (who gets credit for spending money on projects) to consider the spatial, structural, or functional implications of existing or proposed interventions.

It is important to note and acknowledge that ignoring *evaluable* performance measures of a spatial, structural, or functional nature is not without its purpose. It is, as is increasingly known, a much-practiced way of covering up deviations from intended outcomes or processes, which is particularly important if the matters under consideration represent failure on the part of one or both participants!

In summary, both formal and informal provincial government assessment processes involving federal (urban-related) policies have been and are weakly defined. Analytical capabilities to perform the assessment is building [62], but the overriding significance of sectoral and political relations between the two senior levels tends to minimize or limit attempts to imbed, and maintain, policy impact assessment processes which specifically consider urban implications.

Concerning the intra-province impact assessment process, there is great diversity in two basic respects: the dealings among the functions and departments comprising a provincial government; and, the elements and units of provincial governments vis-à-vis those in municipal (local) governments in the respective provinces. Several situations are presented to elaborate the variations of differences which exist.

In 1976 the Government of Ontario, after much in-house deliberation, produced *Design for Development* [51]. This was a policy and program document to guide overall spatial development of regional and municipal units of government. The hard-arrived-at standard to direct and measure progress was launched with much fanfare, received with much external criticism (substance and process), and relegated to the shelf where it now rests in limbo, its status neither confirmed nor denied by the government.

During the same period (1970-1980) the Governments of Alberta, Saskatchewan, and Manitoba were working on and launching their community-oriented policy and program initiatives [58]. In all three cases, and in particular Alberta with its policy of "Balanced Population and Economic Growth," the formal impact assessment processes involving provincial and local officials yielded a series of policy and program statements and actions.

The Government of Quebec, as a final example, in 1978 introduced Bill 125 and associated community development measures (in recognition of a long-standing wish from local officials) to render the authority of local governments to run their affairs more commensurate with their responsibilities. The Quebec government, by devolving some of its policy and program options and obligations to the local level, is precipitating a reworking of policy assessment

processes in terms of the actors involved, and the ways and means of performing evaluations.

Within the governments, then, the status of impact assessment processes is mixed in terms of both purpose and instruments involved. The urban and regional dimension is most apparent or considered by provincial governments, however, when policies and intergovernmental (provincial - local) relations are involved. With regard to urban development, or pattern of settlement development, the top-down, uni-sectoral approach is still very much in evidence intra- and interdepartmentally. For the most part provincial governments still tend to regard municipal governments as little more than the end of the delivery-of-services chain, which largely explains the undeveloped state of urban impact assessment at the provincial level in much of Canada. There are, of course, flourishes of activity, and state-of-the-art efforts for examining existing or impending situations make brief appearances, but UIA efforts are not generally present on a sustained basis within provincial governments.

Urban Impact Assessment Process: Municipal

Urban (and regional) planning by definition corresponds in large part with (and potentially subsumes) urban impact assessment, in both substance and process aspects. Further, all municipalities in Canada engage in urban (and regional) planning to some degree, and in other operational and administrative activities which lead to decisions to change or not to change local states of affairs. Consequently, among the three levels of government, UIA has the highest real and potential presence at the local level in terms of number of actors and immediate influence.

Prior to discussion of the nature and status of the UIA presence at the local level, several underlying conditions or features must be noted:¹⁴

- There is considerable variation among provinces in terms of the extent to which provincial government paternalism or control reaches into local governments. This affects both the initiative and the vigour of local governments in terms of creation of, and respect for policy impact assessment processes.
- In all provinces there are boards, commissions, etc., which are struck by either provincial or local governments for the express purpose of holding hearings or receiving testimony of

¹⁴The bases of these comments are personal experiences while the author was at Urban Affairs (1972-1979), and several of the "Background Papers" from the Management and Planning Capabilities in Small Communities Study, Federation of Canadian Municipalities [12].

an urban impact nature. Further, the assessment element takes on a variety of modes and shapes (e.g. quantitative/qualitative, verbal/written, expert/lay person). In this regard the assessment process may be formal or informal. As history has frequently shown, *mere formalizing* of the assessment process is not sufficient to correct or avoid policy errors of either omission or commission.

- Individuals and groups can and do submit briefs and make representations to local councils and planning boards, frequently on an issue basis, but channels (processes) for input or involvement are in place across the country, formally and informally.
- Citizen participation in municipal matters did not become popular or transformed into a grass-roots power base until the 1960s. As we enter the 1980s there is much groping on the part of municipal officials (elected and appointed) and community activists as to both the appropriate role of the latter in policy assessment; and, the preferred ways and means (processes) of associating public officials and citizen activists in UIA and conflict resolution situations [59].

In general, then, UIA is an endemic, ever-present feature of local government because, simply, local government is essentially of the people in terms of where they shop, work, reside, recreate, etc. Urban impact assessment, in the level of government closest to the people is, therefore, inherent or intrinsic to the processes of local governance.

The status of policy impact assessment processes at the local level is beginning to be documented, although there has been in Canada a long-standing bias towards research involving only the large centres and agglomerations (100,000 or more population). Table 1, from a recent study conducted under the auspices of the Federation of Canadian Municipalities [12] and previously discussed by Wellar [63] illustrates the extent to which formal and informal policy impact assessment processes are or might be instituted in principle and practice at the small municipality level in Canada.

As indicated by the table, municipalities in the 1,000-100,000 population range are forward-looking in terms of *good intentions* related to policy impact assessment processes, and environments conducive to those processes. However, as the percentages for the technical variables (3,4,5,6) show, most of these communities have not carried out studies which underlie UIA. Although several other factors (politics, location of centre) help explain the state of UIA activities in small communities it remains, quite simply, that such centres generally lack the needed in-house technical expertise to perform UIA, or the funds to hire consultants to conduct UIA [12].

Table 1
POLICY IMPACT ASSESSMENT PROCESSES IN SMALL
CANADIAN MUNICIPALITIES*

Variable as Indicator	%
1. Municipalities that review performance targets annually	75
2. Municipalities with formalized long-term planning objectives in place or impending	72
3. Municipalities with an approved Official Plan	46
4. Municipalities with formal public participation processes	38
5. Municipalities undertaking strategic planning	29
6. Municipalities which have completed background studies	
- design	20
- transit	12
- economic	19
- environment	17

*Responses are from approximately 435 of the 1,598 "small" communities (1,000-100,000 populations) in Canada.

Source: Federation of Canadian Municipalities [12].

As for the larger Canadian centres (100,000 plus), they have a somewhat better match between good policy impact assessment intentions and the technical capability to carry out urban impact analysis.¹⁵ The fact persists, however, that the vast majority of Canadian communities, accounting for some 30-40 percent of the country's population, lack either the resources or practices to perform UIA at a level which is sensitive to the problems confronting these communities.

Conclusion

There are few if any scientific or societal grounds for enthusiasm about the Canadian record, 1968-1982, with regard to the place and treatment accorded urban impact assessment principles and practices in public policy processes.

¹⁵The UIA (technical) state-of-the-art in Canada's larger centres is tied closely to the purposes and ways that computer-assisted information systems are used in those centres by the management, planning, and operations functions. For an overview of what has been achieved or is intended in this regard, as expressed by local officials from across Canada see [23;24;60].

Local governments were generally perceived by senior governments as the implementers of their policies and programs, and were in a weak political position in terms of influencing either the contents or delivery mechanisms associated with those policies and programs. Further, the planning function of local governments, as the function likely responsible for conducting UIA, was largely ill-equipped in terms of personal/technical and financial resources to conduct UIA in a thorough, sustained manner.

Hence, the local level of government was marked by vulnerability where UIA was concerned. Senior governments, through their sectoral (and frequently counter-productive) policies and programs were frequently sources or contributors to aspects of the "urban problem" [12]. They could not be brought to account, however, because local governments lacked both the capability to conduct technical UIA in either the *ex ante* or *ex poste* policy respects, and the political clout to effect policy changes dictated on the grounds of plain common sense. One consequence of this state of affairs is that few communities in Canada possess the will, much less the ability, to utilize UIA as a means to resolving their respective urban problem(s).

As for UIA principles and practices in the policy processes of provincial governments, 1968-1982, they were virtually absent through to the mid-1970s. The sectoral approach with an economic lead prevailed, and "municipal" rather than "urban" was the operant word for legislative, policy and program activities. Indeed, it may not be far from the truth to suggest that provincial interest in the urban domain followed that of the federal government (when the federal government may have been seen as engaging in territorial encroachment).

Provincial government efforts regarding UIA were "stimulated" in the 1970s by the Research and Coordination Branches, Ministry of State for Urban Affairs. By way of illustration of this point, by 1974-75 every provincial government in Canada had become engaged with MSUA in a UIA-type of endeavour of some nature, including those which primarily involved the provision of expertise or funds to conduct UIA pilot studies of a theoretical/methodological or empirical nature.

With the passing of MSUA, however, there appears to have been a fading of interest in UIA to the point where no provincial government in the country can arguably lay serious claim to either performing, or being able to perform, UIA with any degree of rigour or vigour. This situation should be a matter of grave concern because only a very few provinces experienced more than marginal success towards resolving their respective urban problem(s) during the fourteen year study period (or the past several decades for that matter). Of possibly even greater concern, however, is the inability or unwillingness of provincial governments in general to accept that

dated provincial-municipal conventions simply do not work and cannot be made to work, UIA notwithstanding, and that local initiative [25;26;28;59] must be encouraged rather than constrained if the urban problem in its national and regional respects is not to become a chronic condition.

With regard to the status of urban impact assessment in federal public policy processes, a number of conclusions were drawn in the text. One which provides an appropriate summary is repeated: "Bluntly put, the federal government up to 1979 was devoid of any generally accepted, established and adhered to processes with respect to policy impact assessment of an urban character." And, as for the period 1979-1982 the federal government's performance and its inclinations for the matter has been even more wanting, if that is possible.

That performance (à la that of provincial governments) would be understandable: 1) if federal policies and programs were invariably positive (or at worst neutral) in terms of their urban impacts and, 2) if the process of urbanization and the state or urban centres and systems of centres had neutral (or invariably positive) implications in terms of federal policy and program outcomes.

Since neither condition is even remotely close to reality (witness both our continuing urban problem(s) and failed federal initiatives, in both the sectoral and spatial respects) a question is in order: How much longer will available benefits be foregone and unnecessary costs be incurred before the Government of Canada even begins to consider *urban impact assessment* as a useful and possibly vital component of the policy and program process? Until such time as the federal government does come to grips with, and effectively deals with questions of that nature, questions of fundamental societal concern, then "real improvements in the decision-making process" [50:v] will of necessity be of the housekeeping or tinkering variety.

Prospective

The urban impact assessment component of public policy processes in Canada, 1968-1982, lends itself to a series of riddle-like but pointed questions: How could governments (and their officials) have produced so much yet achieved so little, been apprised of so many things yet remained so ignorant or, given their proclivity for intervention, become so outward-acting while remaining so inward-looking? And, worse, at least for those who are not satisfied with what public policy processes have brought in the urban domain, the future appears no more promising if the unfolding continues as it has for the period under study.

Towards a different end - a *preferred* urban future - several selected suggestions arising from earlier parts of this paper are

proposed for consideration as tactical ways and means for enhancing the urban/urbanization dimension of public policy processes.

1. That "urbanists," whether in or out of government, adopt UIA or a variation thereof as a thematic, ever-present principle or talking-point in papers, articles, lectures, etc. It is now well established that just as "urban/urbanization" is difficult to capture in terms of concepts and implications, so is it difficult for related observations or arguments to capture the minds or imaginations of non-urbanists. UIA, more for reasons of connotation than denotation, could provide the hook or handle which *might* apture the minds or imaginations of non-urbanists. UIA persuade public sector officials (elected and appointed) to consciously incorporate an urban/urbanization dimension in their policy implications checklist.
2. "Out of sight, out of mind" and, "The squeaky wheel gets the grease," are probably two of the more apt descriptions of how public processes work. There appears to be little doubt that public officials would prefer not to deal with urban/urbanization problems because of their difficulty of resolution; and urbanists in Canada have been most accommodating in terms of *not* systematically forcing public officials to think about, and answer to, the urban/urbanization aspects of policy and program inputs and consequences.

There are a variety of options open in this regard, but obvious first steps include inquiries of the type described in this paper, and the reporting of "findings" at conferences and in articles. Until pressure of this sort is applied, urban/urbanization problems will for all intents and purposes remain a non-issue for governments at all levels.

3. Urbanists in Canada have not performed well in terms of *communicating to the public at large* the (unnecessary) benefits foregone or costs incurred as a consequence of public policy processes which have not, do not, or will not take proper account of the urban/urbanization consequences of policy and program initiatives.

In fact, even when the Federal Ministry of State for Urban Affairs was in place, and provided a sort of national focal point for debate and dialogue about urban development, too many urbanists (including geographers, planners, sociologists, regional scientists, public administrators, etc.) were for all intents and purposes content to do their own thing. In particular, they did not purposefully seek to promote or provoke public discussion and exposure of MSUA's efforts; further, there was no concerted effort to directly inform and involve the lay public in the sense of a common cause pursuit towards

resolution of urban problems of the day, and avoidance of urban problems in the future.

As anyone who remains apprised of public events reporting in the print and electronic media is aware, Canadians are besieged on a daily basis by massive amounts of news of a phenomenon type (e.g., the Constitution, unemployment and jobs, energy security and prices, housing shortages and high mortgage costs, VIA rail cuts, mega-projects, etc.). Concerned urbanists are simply going to have to get their hands dirty by way of UIA, for example, and *create news for public consumption* - at public meetings on urban-related issues, through newspaper articles and letters, through radio talk and hot-line shows, and so on - unless of course their concern falls somewhat short of the action stage.

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