The Franklin County Food Policy Audit

A report developed for the Franklin County Local Food Council

Columbus, OH December, 2012

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Special thanks to:

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And all other food system stakeholders who contributed their extensive knowledge and insight to the completion of this project

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EXECUTIVE SUMMARY

In June of 2012, the Franklin County Local Food council voted to conduct a formal audit of the county's agro-food related policies and programs. To conduct the audit, a 100-point scorecard was assembled to gauge Franklin County's performance in four broad policy categories: Promoting Local Food, Sustainability, and Community Food Security; Strengthening Zoning and Land Use; Addressing Public Health and Food Access; and Fostering Social Equity. The following is a brief overview of the findings that emerged from the Franklin County Food Policy Audit (FCFPA).

While the term "food policy" has been popularized in recent years due to increased consumer demand for local, sustainable, and ethical food, the actual application of the term remains ambiguous. Since there is no single entity that handles all programs and regulations related to food—from production to waste and back again—understanding "food policy" means being aware of the roles and activities of a wide variety of institutions, both public and private. A food policy audit provides a way to comprehensively aggregate information about ongoing programs and initiatives while identifying gaps and opportunities for the future activities of a coordinating body such as a food council or local government.

Stakeholder input

To capture a wide range of knowledge and resources, input was gathered from 15 different stakeholders representing 13 institutions that play a crucial role in the Franklin County Food System. These institutions include:

- 1. The Franklin County Economic Development and Planning Department
- 2. The Franklin County Purchasing Department
- 3. Franklin Soil and Water Conservation District
- 4. Ohio State University Extension, Franklin County
- 5. The Economic and Community Development Institute
- 6. Franklin County Emergency Management and Homeland Security

- 7. The Mid-Ohio Foodbank
- 8. Local Matters
- 9. The Ohio Environmental Protection Agency Central District, Franklin County
- 10. The Ohio Environmental Protection Agency
- 11. The Mid-Ohio Regional Planning Commission
- 12. The Franklin County Office of Management and Budget
- 13. Columbus Public Health

Summary of results

The policy audit scorecard contains 100 policy items, phrased as questions, and divided into four broad categories and eighteen subcategories. Each item is assigned a value of one point and each category and subcategory contains a different number of items. After consulting one or more stakeholders regarding each policy item, the following category results were obtained:

Category	Score	Score as %	Category % of Total Score
1. Promoting Local Food, Sustainability, and Community Food Security	23/44	52.3	42.6
2. Strengthening Zoning and Land Use	19/27	70.4	35.2
3. Addressing Public Health and Food Access	8/20	40.0	14.8
4. Fostering Social Equity	4/9	44.4	7.4
Total	54/100		100

Franklin County received an overall score of 54/100 on the Food Policy Audit. Since the Franklin County Food Policy Audit is the first of its kind, there is no standard of comparison for this score. However, this score does tell us that Franklin County has made significant progress toward strengthening its local food system. Nonetheless, there is still plenty of opportunity for both the council and the county to take action toward fostering a local, healthy, and sustainable food system that meets the social, economic, and ecological needs of all of Franklin County's wonderful and diverse residents.

Summary of recommendations

Based on the audit findings, the following actions were recommended to the Franklin County Local Food Council as priority policy areas:

- 1. Request that Franklin County Commissioners issue a formal resolution that prioritizes objectives related to public health, ecological sustainability, and economic development with regards to the Franklin County food system. The resolution could be modeled after previous county resolutions, such as the sustainability resolution (No. 683-06), or after food-related resolutions in other localities.
- 2. Leverage local, state, and national funding mechanisms to increase the availability of healthy, fresh, sustainable, and local food in schools and other public institutions.
- 3. Establish a program that increases benefits for EBT expenditures at the farmers' market, such as Michigan's "Double Up Food Bucks" program, which matches SNAP benefits redeemed at farmers' markets with tokens worth up to \$20 to spend on fresh produce.
- 4. Provide business/tax incentives and pre-development assistance to fresh food outlets for the siting of stores in low-income communities, such as Pennsylvania's Fresh Food Financing Initiative, which "provides predevelopment grants and loans, land acquisition financing, equipment financing, capital grants for project funding gaps and construction and permanent finance... [as well as] technical assistance and workforce services" to supermarkets and fresh food retailers for locating stores in underserved areas.
- 5. Connect local food businesses to the county Purchasing Department's educational programs for small and minority-owned businesses/encouraging local food businesses to bid on county RFP's.
- 6. Lend economic development support to farmers and urban agriculturalists through new-entry farmer training programs, policy and programmatic roadmaps, and/or farm labor support programs.
- 7. Establish programs to collect food scraps, incentivize composting, and/or educate county residents about the benefits and practice of composting food waste.
- 8. Provide a print resource or designating a county employee to assist residents with the process of establishing farmers' markets.
- 9. Provide on-demand transportation services to low-income neighborhoods for access to supermarkets and other healthy food retail outlets.
- 10. Raise public awareness of healthy food choices through such mechanisms as soda taxes and calorie counts on menus.
- 11. Undertake a countywide community garden evaluation project to determine success of the county's Community Gardening Zoning Regulation.

INTRODUCTION

While the term "food policy" has been popularized in recent years due to increased consumer demand for local, sustainable, and ethical food, the actual application of the term remains ambiguous. Since there is no single entity that handles all programs and regulations related to food—from production to waste and back again—understanding "food policy" means being aware of the roles and activities of a wide variety of institutions, both public and private. A food policy audit provides a way to comprehensively aggregate information about ongoing programs and initiatives while identifying gaps and opportunities for the future activities of a coordinating body such as a food council or local government.

Background

The Franklin County Local Food Council (FCLFC) formed in late 2011 to assess, strengthen, and localize the food system in the Franklin County area. The council, hosted by the Mid-Ohio Regional Planning Commission (MORPC), developed the following strategies to guide its work:

- Linking food and farm businesses, non-profit organizations and local government entities in a common effort to support a resilient local food system.
- Improving the availability of safe and healthful local food at affordable prices for all.
- Addressing barriers to and opportunities for strengthening connections among producers, processors, distributors, retailers, and recyclers.
- Ensuring through education that citizens, agencies, organizations and local businesses consider a healthful and resilient local food system to be an essential part of all policy, planning, and decision-making.²

While these strategies reflect a number of approaches to strengthening the local food system, the unifying theme is "connecting the dots." Members of the council have consistently used this language to refer to their informal mission of fostering coordination and collaboration among different food system sectors.

The council spent much of its first year developing an operational structure and establishing strategic priorities. More recently, however, it has focused on understanding the current state of the county's food system. In early 2012, the FCLFC hosted an intern who took on the task of producing a report outlining the barriers and opportunities that stakeholders perceived in fostering a more sustainable local food system. Information for the report was drawn from interviews with local stakeholders, published studies, and examples of best practices.³ Through its findings and recommendations, this report laid considerable groundwork for a formal investigation of the existing policies and programs that could influence sought-after food system changes.

In June of 2012, the council voted to conduct a formal countywide audit of agro-food related policies. The following report details the methods and findings of the Franklin County Food Policy Audit (FCFPA). The report includes a description of the process, analysis and recommendations based on key findings, and recommendations to localities interested in conducting a similar audit in their own communities.

DEVELOPMENT AND METHODS

Developing the audit

The methods for conducting the FCFPA were adapted primarily from a model piloted by a policy and planning class at the University of Virginia (UVA)⁴. Most notably, the FCFPA scorecard (Appendix A) wad derived from the Food Policy Audit Tool⁵ developed by that class, and published by UVA's Institute for Environmental Negotiation (IEN). This tool was designed specifically for county-wide audits, and consisted of just over 100 policy items, phrased as questions, and divided into five broad categories and 20 subcategories. Using the published version as a template, I created the FCFPA Scorecard to reflect my understanding of the FCLFC's priorities and interests, with the intention of presenting my version of the audit tool to the FCLFC for approval.

While the FCFPA Scorecard contains many items taken directly from IEN's Food Policy Audit Tool, the categories and subcategories were changed and rearranged, irrelevant items were removed, and items more relevant to the barriers and opportunities faced by Franklin County were added. Since the FCLFC was primarily interested in fostering systemic approaches to localizing the food system, preserving agricultural land, and exploring food waste issues, items that addressed those topics were added to and/or prioritized on the scorecard. The resulting scorecard contained an even 100 items, phrased as questions, and divided into four broad categories and eighteen subcategories as follows (for detailed scorecard with items listed, see Appendix A):

- 1. Promoting Local Food, Sustainability, and Community Food Security
 - 1.1. Systemic Approaches
 - 1.2. Supporting sustainable agriculture
 - 1.3. Encouraging production for local markets
 - 1.4. Creating markets for local food
 - 1.5. Making local food accessible to low-income populations
 - 1.6. Emergency preparedness and food provisions
 - 1.7. Diverting and recycling food waste
- 2. Strengthening Zoning and Land Use
 - 2.1. Urban agriculture on public land
 - 2.2. Urban agriculture on private land
 - 2.3. Home gardening and agricultural use of residential land
 - 2.4. Traditional agriculture and rural land use
- 3. Addressing Public Health and Food Access
 - 3.1. Healthy food, wellness, and physical activity
 - 3.2. Food offerings in schools and other public institutions
 - 3.3. Community education and empowerment
 - 3.4. Transportation options for accessing food
- 4. Fostering Social Equity
 - 4.1. Food security for disadvantaged populations
 - 4.2. Business incentives for low-income food access
 - 4.3. Equitable conditions for farm laborers

Once the scorecard was developed, I began identifying community stakeholders who might possess knowledge about each specific item. I also identified ancillary public documents where answers to the item questions might be located. While this methodology was similar to that employed in the UVA course, those students began by doing extensive document research and then using stakeholder interviews to supplement their findings. Though I did use document research in the development of the FCFPA

Scorecard and in the process of identifying stakeholders, my strategy was to first tap into Franklin County's wealth of human knowledge and community connectedness. I hoped that my conversations with stakeholders would keep me on the right track in locating the appropriate published and human resources.

I built a list of contact information for stakeholders from the public, private, and nonprofit sectors, drawing on Internet research, prior knowledge of the county's programmatic landscape, and discussions with well-connected members of the FCLFC. I then presented the preliminary contact list, scorecard, and project proposal to the FCLFC during a general body meeting for review and approval. Though some members of the council were interested in broadening the scope of the audit to explore policies specific to Columbus, public schools, and other institutions, the audit was restricted to the county level due to constraints on time and resources. However, it was made clear to the council that a report would be produced to encourage replication of the project in other counties, municipalities, or institutions. The goal of producing a replicable product was also key to MORPC's objective of establishing, supporting, and coordinating efforts between local food councils in each of the 12 counties that make up the Central Ohio region.⁷

Conducting the audit

The finalized list of audit items was divided into spreadsheets corresponding to the various organizations that had been identified as stakeholders. While some items appeared on multiple spreadsheets, each item was directed toward at least one contact. I then composed a form email (Appendix B) requesting a discussion with each of its recipients. The email was sent to 14 contacts for whom names and email addresses were located. After a week, a form follow-up email (Appendix C) was sent to unresponsive recipients to make a second request for an interview. Individuals who could not be reached via email were contacted by phone. See Table 1 for contact details.

Using a mix of in-person interviews, telephone discussions, and email correspondence, input was ultimately gathered from 15 stakeholders representing 15 different organizations and/or departments. Each interview or correspondence contained a snowball component, wherein I requested suggestions for future contacts. Through this process, my contact list evolved over the course of the project until a sufficient resource (either human or documented) was located for each item on the scorecard.

When meeting with individual stakeholders, I went systematically through the items I had allotted to them according to their areas of expertise. During each interview, I made it clear that the questions were meant to foster an open, critical, and constructive dialogue about food-related activities in the county. Interviewees were encouraged to give their honest opinions and assured that none of the questions were meant to be criticisms of their department's activities or impromptu tests of their knowledge. In other words, interviewees were encouraged to make their responses as accurate and detailed as possible. Once the entire list of designated questions had been discussed, I asked interviewees to speak generally about their affiliated organization's role in the food system. I encouraged them to reflect on what they believed their organization was doing well, what they could be doing better, and/or any other follow-up thoughts they had regarding the subject matter of the interviews.

It should be noted that a Food Policy Audit may be conducted at a number of different scales, either independently or conjunctively. For example, the audit from which the FCFPA was adapted examined county-level policies alongside state-level policies, regional guidelines, and school district policies. However, due to time constraints and the county-level purview of the FCLFC, the FCFPA was restricted exclusively to Franklin County. Though some policies and programs may exist at the regional, state, or federal level that would achieve the objectives listed in the audit, those policies were not taken into account unless it was made explicit that county agencies were actively administering or leveraging them. Likewise, I made an effort to primarily interview people whose work had a countywide scope.

However, if I identified a stakeholder working at the municipal or state level who was particularly knowledgeable about certain county-level policies or programs, I did not hesitate to gather input from that stakeholder.

Table 1: FCFPA Stakeholders, Affiliations, and Interview Status

D	epartment, Agency, or Organization Name	Job Title of Individual Contacted	Input Gathered?
1.	Franklin County Economic Development and Planning Department*	Community Development Program Coordinator	✓
2.	Franklin County Public Health*	Community and Environmental Health Supervisor	X
3.	Franklin County Economic Development and Planning Department*	Economic Development Specialist	✓
4.	Franklin County Purchasing Department*	Director of Purchasing	✓
5.	Franklin Soil and Water Conservation District*	Director	✓
6.	Ohio Ecological Food and Farming Association**	Policy Program Coordinator	×
7.	Ohio State University Extension, Franklin County*	County Director/Extension Educator	✓
8.	Franklin County Economic Development and Planning Department*	Planner and Floodplain Manager	✓
9.	Mid-Ohio Foodbank**	Vice President of Agency and Program Services	✓
10	Franklin County Emergency Management and Homeland Security*	Manager- Planning/Recovery	✓
11	The Economic and Community Development Institute**	Director of Food Services and Food Safety	✓
12	Eartha, Ltd.***	Owner & Chief Consultant	X
13	Local Matters**	Director of Public Policy and Community Relations	✓
14	Ohio Environmental Protection Agency Central District, Franklin County*	Solid and Infectious Waste Management Inspector	/
15	Solid Waste Authority of Central Ohio*	Independent Consultant	X
16	Ohio Environmental Protection Agency*	Food Waste Specialist	✓
17	Mid-Ohio Regional Planning Commission*/**	Associate Engineer, Transportation	√
18	Franklin County Office of Management and Budget*	Grants Coordinator	✓
	Columbus Public Health*	Creating Healthy Communities Network Project Director	✓

^{*} Government, educational, or other publically funded institution

^{**}Private, not-for-profit institution (NGO's)

^{***}Private, for-profit institution (Corporations)

FINDINGS AND DISCUSSION

Significant findings

- Franklin County received an overall score of 54/100 on the Food Policy Audit (Table 2). While there is no real standard of comparison for this score, we can say that if the FCFPA represents a rubric for the strongest food system we can envision in Franklin County, the county is a little over halfway to achieving a perfect score. This tells us that Franklin County has made great strides in addressing many local food issues, and yet maintains many opportunities for improvement through policy.
- The category of *Promoting Local Food, Sustainability, and Community Food Security* contributed the highest number of points to the overall score (23/54, or 42.6% of the total score). Within this broad category, the County scored highly on "Creating Markets for Local Food" (6/9), but received only 1 point out of 6 on "Encouraging Production for Local Markets" (Table 2). This contrast reflects a concern that has already been voiced by many on the council: although the demand for local food is strong, many efforts to strengthen the county's food system have been focused on fostering demand rather than creating the infrastructure that will allow local producers to respond to that demand.
- Franklin County scored highest in the *Strengthening Zoning and Land Use* category, with a score of 19/27. Matt Brown, Planner and Floodplain Manager for Franklin County and member of the FCLFC, is a strong advocate for strengthening the local food system through agricultural and open space preservation. Additionally, the county commissioners' recent food-related resolutions, such as the Community Garden Zoning Regulation (2010)⁸ and the Beekeeping Zoning Regulation (2009),⁹ have used the zoning code as a mechanism through which to strengthen the food system. At this juncture, the county's zoning code is relatively conducive to a variety of agricultural pursuits.
- While it appears that food system activities are occurring in almost every area of the food system identified by the audit, some activities seem to be occurring in isolation from potential partners. A great deal of progress could be made through coordination and collaboration between entities in Franklin County. Although this effort is already underway on the FCLFC, the council should use the findings of this audit to identify new partnerships and educational opportunities for organizations that are not yet involved in collaborative efforts to expand and strengthen the local food system.
- The Franklin County Local Food Council may want to consider reaching out to certain entities to expand its reach, impact, and collaborative strength. Specifically, the following organizations may have a great deal of potential to contribute to the food council's mission:
 - Franklin County Public Health
 - > Franklin County Job and Family Services
 - Franklin Soil and Water Conservation District (SWCD)
 - Franklin County Purchasing Department
 - The Ohio Ecological Food and Farming Association (OEFFA)
 - The Solid Waste Authority of Central Ohio (SWACO)
 - ➤ Ohio State University Extension, Franklin County.

Table 2: Summary of Scores for the FCFPA

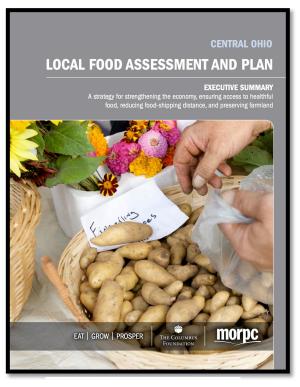
Category or Subcategory			Score as %	Category % of Total Score	
5.	Promoting Local Food, Sustainability, and Community Food Security	23/44	52.3	42.6	
	5.1. Systemic Approaches	1/4	25.0		
	5.2. Supporting sustainable agriculture	3/6	50.0		
	5.3. Encouraging production for local markets	1/6	16.7		
	5.4. Creating markets for local food	6/9	66.7		
	5.5. Making local food accessible to low-income populations	2/3	66.7		
	5.6. Emergency preparedness and food provisions	5/5	100.0		
	5.7. Diverting and recycling food waste	6/11	54.5		
6.	Strengthening Zoning and Land Use	19/27	70.4	35.2	
	6.1. Urban agriculture on public land	5/6	83.3		
	6.2. Urban agriculture on private land	5/6	83.3		
	6.3. Home gardening and agricultural use of residential land	4/7	57.1		
	6.4. Traditional agriculture and rural land use	5/8	62.5		
7.	Addressing Public Health and Food Access	8/20	40.0	14.8	
	7.1. Healthy food, wellness, and physical activity	2/3	66.7		
	7.2. Food offerings in schools and other public institutions	0/6	0.0		
	7.3. Community education and empowerment	1/5	20.0		
	7.4. Transportation options for accessing food	5/6	83.3		
8.	Fostering Social Equity	4/9	44.4	7.4	
	8.1. Food security for disadvantaged populations	2/4	50.0		
	8.2. Business incentives for low-income food access	1/3	33.3		
	8.3. Equitable conditions for farm laborers	1/2	50.0		
Tot	zal	54/100		100	

Key findings by category and subcategory

1. Promoting Local Food, Sustainability, and Community Food Security

1.1. Systemic Approaches

In August of 2006, Franklin County Commissioners passed a "Resolution Solidifying Franklin County's Commitment to the Mutually Compatible Goals of Environmental Protection and Economic Growth and the Commitment to Promote Sustainable Principles in Policy Decisions and Programs" (Resolution No. 683-06). This resolution addressed many issues related to the creation of a thriving local food system, stating, "The Board of Commissioners of Franklin County, Ohio, will ensure environmental quality when making decisions regarding growth management, transportation, energy, water, air quality and economic development." However, Franklin County Commissioners have not issued a similar resolution that addresses food as a systemic issue involving public health, ecological sustainability, and economic development. An example of such a resolution can be found in the city of San Francisco's Executive Directive 09-03: "Healthy and Sustainable Food for San Francisco," which



states, "The City declares its commitment to increasing the amount of healthy and sustainable food." The directive details ways in which the city will enact this commitment, mandates a food policy council to be comprised of representatives from specific departments and sectors, and charges municipal departments with key tasks toward supporting the directive.

While Franklin County has no similar mandate, it does house the FCLFC, which arose from MORPC's "Local Food Assessment and Plan." Both the plan and the presence of the council represent a commitment to approaching food issues systemically, and both have the potential to influence policymakers should an official policy regarding the sustainability, health, and/or sovereignty of the food system become a priority for the county.

Figure 1 Source: www.morpc.org

1.2. Supporting Sustainable Agriculture

Although there are no county-level policies that address agricultural sustainability, the Franklin Soil and Water Conservation District (SWCD) is responsible for administering the Ohio Department of Natural Resources' Agricultural Pollution Abatement Program (APAP). The APAP, however, is targeted toward mitigating the effects of nonpoint source pollution and runoff through barriers and diversion techniques. Therefore, there is no component of that program or any other program of which the SWCD is aware that offers incentives for reducing pollution at the point of production (i.e. incentives for switching to low-spray or organic growing methods). The possibility of incentivizing sustainable production techniques as part of a greater mission to increase local production of specialty crops merits exploration.

Farmers who pursue more sustainable growing methods can find an educational resource in their backyard through the Ohio Ecological Food and Farming Association (OEFFA). However, the Policy Program Coordinator at OEFFA respectfully declined the opportunity to discuss agricultural policy in Franklin County with regards to ecological sustainability based on a perceived lack of expertise regarding county-level policies in this area. It is a noteworthy finding that I failed to locate a contact who felt prepared to speak knowledgeably about the policy landscape for sustainable agriculture in Franklin County. Farmers looking to switch to more sustainable growing methods might benefit from a resource that could provide them with a roadmap of policies or menu of programs to help them transition.

1.3. Encouraging Production for Local Markets

As stated above, Franklin County has struggled in its efforts to encourage production for local markets. While Section 1.11, Item G of the Franklin County Zoning Resolution states that one of the policies underpinning the zoning resolution is "To preserve viable agricultural opportunities and to

protect agricultural lands to sustain a local circle of food production and consumption," similar policies have not been adopted by the county commissioners to foster coordination between zoning and other food system sectors. However, Matt Brown of the Franklin County Economic Development and Planning Department reports that recent land use plans for townships in the county have begun to include production and distribution of local food as a core tenet. He cited the Blacklick-Madison Area Plan, 19 which adopts recommendations made in the Central Ohio Local Food Assessment and Plan, as a particularly strong example of this shift in planning focus. 20

However, the audit reveals few mechanisms to provide Franklin County producers with economic or infrastructure support. While the county is dominated by urban landscape, the 2007 Census of Agriculture reported that it still supports 429 farm operations.²¹ These farms appear to receive little in the way of direct financing or labor support from the county. The Economic Community and Development Initiative (ECDI), however, receives some funds from the Franklin County Economic Development and Planning Department for infrastructure projects, such as the newly opened Food Fort, which contains a kitchen incubator and mobile food commissary. 22 According to Bob Kramer, ECDI's Director of Food Safety and Food Services, the Food Fort may eventually explore the potential of becoming a small-scale USDA certified processing facility for local producers.²³ Additionally, plans to revitalize Columbus's Weinland Park neighborhood include the construction of a processing facility that would allow local producers to preserve their products for out-of-season sale.²⁴



Figure 2 Source: www.facebook.com/FoodFortColumbus

While both of these projects indicate progress in the development of infrastructure for small and midsize producers, those farmers who want to produce for local markets still receive little support in the production process. In her report on the state of Franklin County's food system, student intern Jess Stoltz reported a desire on the part of producers to receive more financial and regulatory support for their operations. Based on this finding, I asked interviewees if Franklin County supported an organization, agency, or individual who is able to provide farmers with technical assistance regarding financial solvency, and/or regulatory compliance (Appendix A). Those interviewed could not identify a county-level entity that played such a role. Nor could interviewees identify a policy or program that focused on enhancing farm labor, such as a training program for beginning farmers or support systems for seasonal labor. However, the Ohio Department of Agriculture (ODA) may fulfill all of these roles at the state level, given that food production and processing are regulated by the state. Nonetheless, the fact that interviewees could not identify a local point person or entity available to farmers for consultation and/or economic support may be an issue of some concern.

This apparent lack of production support is particularly detrimental to new-entry and beginning farmers, who may benefit from the creation of a policy and programmatic roadmap for new agricultural operations. Another solution may involve a training program, such Cuyahoga County's Beginning Entrepreneurs in Agriculture Networks (BEAN) Project, which "covers many aspects of beginning farming, from finding land to use, how to get started with farming and access local resources, as well as how to get started with the business side of the market garden and locate outlets for the gardener's products." ²⁸

1.4. Creating Markets for Local Food

Franklin County scored highly in this area, most likely due largely to ECDI's focus on local food and food-related businesses. The county's Department of Economic Development supports ECDI by channeling money into their programs. ²⁹ ECDI, in turn, has contributed to the creation of markets for local food products through its Food Fort based initiatives, which include a kitchen incubator program, a food cart rental program, a mobile food commissary, a training programs for food business starters, and partnerships with retailers that source locally, such as the Greener Grocer. ³⁰



Figure 3 Source: www.bizjournals.com

Local Matters, a Columbus nonprofit with a mission "to transform the food system in central Ohio to be more secure, prosperous, just and delicious," also contributes significantly to the creation of markets for local food in Franklin County. Local Matters promotes the consumption of local food through educational programs, distributes local food through a weekly fresh market bag program, and encourages low-income consumption of fresh food through the Veggie Van program, which delivers fresh local produce to economically disadvantaged communities throughout Columbus. 32

While this category largely represents successes for Franklin County, it still contains areas for improvement. For example, Franklin County does not have an institutional resource that assists residents with establishing farmers' markets in their communities.³³ Although the council may want to pursue this policy gap, another gap that was identified by this audit category—that of supporting food hubs and other businesses that focus on regional distribution of local food—is one that is already being discussed as part of the Weinland Park community revitalization project.³⁴

1.5. Making Local Food Accessible to Low-Income Populations

Franklin County Community Development has prioritized access to fresh, local food for low-income populations through its Healthy Corner Store Initiative, Fresh Foods Here (FFH). Sommunity Development piloted the FFH initiative in two of Columbus's designated food deserts (Franklinton and Harrisburg Pike), and now plans to expand the program due to its success. The FFH program offers support to retailers in underserved neighborhoods to carry fresh produce. The project also incorporates Franklinton Gardens, a Columbus urban agriculture operation, as one of its partners to ensure that a portion of the produce offered through the program is sourced locally. As part of this program, Community Development has worked with retailers to make them capable of accepting WIC and SNAP (Food Stamp) benefits.

Additionally, the county works with farmers' markets to equip them with the necessary technology to accept Electronic Benefit Transfers (EBT) and Senior Farmers Market Nutrition Program (SFMNP) benefits.³⁸ Efforts are made in Franklin County to encourage EBT acceptance, but Noreen Warnock

FRESH FOODS HERE

Figure 4 Source: www.franklintongardens.org

of Local Matters and the FCLFC notes that acceptance of WIC (nutrition benefits for Women, Infant, and Children) and Senior Nutrition coupons is not as prevalent among farmers' markets.³⁹ This deficit may

represent a gap in achieving low-income access to local food. Nor does the county currently have a program that increases benefits for EBT expenditures at farmers' markets, such as Michigan's "Double Up Food Bucks" program. However, Kate Matheny, Grants Coordinator for the County Commissioners' Office, expressed interest in pursuing such a program. ⁴¹

1.6. Emergency Preparedness and Food Provisions

Although Franklin County's Department of Emergency Management & Homeland Security does not directly provide food to the public during an emergency, 42 the county's Emergency Operations Plan does designate the American Red Cross as the entity responsible for feeding disaster victims. Bridget DeCrane from the Mid-Ohio Foodbank confirmed that, in case of emergency situations, the foodbank has an agreement with the Red Cross and County Commissioners' Office to employ their fleet and staff for food distribution. 43 The county also offers financial support to the Mid-Ohio Foodbank for acquisition, storage, and distribution of food provisions, which may be used during emergencies. 44 Overall, it appears that emergency food supplies are successfully coordinated between a number of private entities.



Figure 5 Source: www.dispatch.com

There are also ongoing efforts in the county to address urgent hunger and food security needs on a more regular basis. For example, HandsOn Central Ohio publishes a for-sale directory to individuals or organizations seeking a list of human services available in the region. However, as Bridget DeCrane points out, organizations must self-elect to be included in the directories published by HandsOn, indicating that they may not contain all of the county's food-related resources. Franklin County Emergency Management and Homeland Security supports HandsOn for preparedness planning and outreach planning pursuant to the County Commissioners' Resolution No. 0656-12. 45

While protocols and resources do appear to be in place for emergency food provisioning, Bridget DeCrane still sees opportunity to strengthen policies in Franklin County to "consistently and effectively support the spectrum of entities, organizations, communities and individuals impacted by local/global food systems."

1.7. Diverting and Recycling Food Waste

The state of Ohio has a major advocate for food waste issues employed with the Ohio Environmental Protection Agency (EPA). Angel Arroyo-Rodriguez played a crucial role in the development and completion of this audit. He contributed both questions and answers to the "Diverting and Recycling Food Waste" section, which was a priority interest area for the council.

While Franklin County does not appear to proactively facilitate the composting of food waste, policies overall do not appear to directly inhibit composting operations. For example, nothing in the zoning code specifically prohibits activities and structures associated with composting on either commercial properties or community gardens. Franklin County also does not prohibit the collection of food waste generated off-site in community gardens, but the city of Columbus does prohibit such collection as it is considered manufacturing. On the other hand, Columbus does support large-scale processing of food waste through its agreement to use Quasar anaerobic digester for sewage sludge, thereby maintaining the availability of the facility for food waste digestion. Franklin County Economic

Development also supports the establishment of large-scale food waste processing facilities by acting as a conduit for Ohio EPA's market and community development grants, which can be used for composting and food recycling operations.⁵⁰

Edible food scraps are also recycled through a Mid-Ohio Foodbank program that coordinates the redistribution of prepared foods to soup kitchens and shelters.⁵¹ Additionally, a single-facility model that would prepare and redistribute donated excess food from area businesses is being explored as part of the Weinland Park community revitalization project.⁵²

Overall, more could be done to facilitate the recycling and diversion of food waste in Franklin County. For example, county-wide programs to collect food scraps, incentivize composting, or educate residents about the benefits of residential composting would constitute major steps toward creating a more sustainable food system. In order to achieve these outcomes, the FCLFC may want to explore the possibility of including a solid waste management or planning professional on the council.

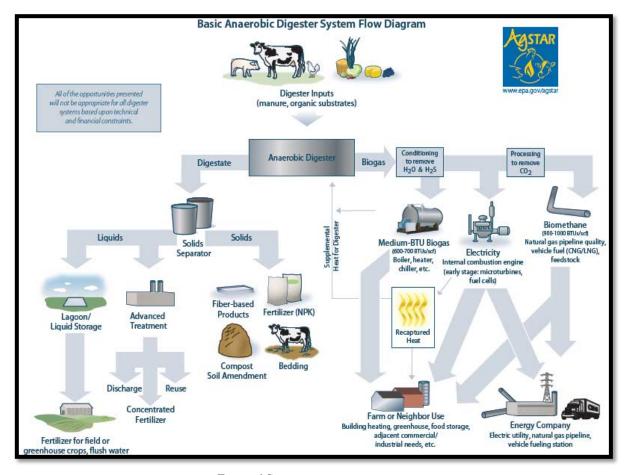


Figure 6 Source: www.epa.gov

2. Zoning and Land Use

2.1. Urban Agriculture on Public Land

The Franklin County Planning Division recently worked with county stakeholders to develop the Community Garden Zoning Regulation,⁵³ which opens up the use of plots less than one acre to agricultural pursuits which are "intended to provide an opportunity for citizens to grow food, ornamental

crops, and other plants in a shared environment while providing adequate protections to participants and the surrounding area.",54 Thus, the county has recently altered its zoning policies to encourage urban agriculture for the public good. This includes allowing the use of vacant lots, some private lots, and public land for multi-user gardens, pursuant to the conditions established by the community garden section of the code.55

Other county efforts offer additional support to the foundation and success of community gardens. For example, as of February 2012, the Franklin County Treasurer has been operating the Land Bank Program, which establishes the seizure of vacant and tax-delinquent properties for demolition or rehabilitation.⁵⁶ This program supplements community garden efforts by making more properties available for gardening.

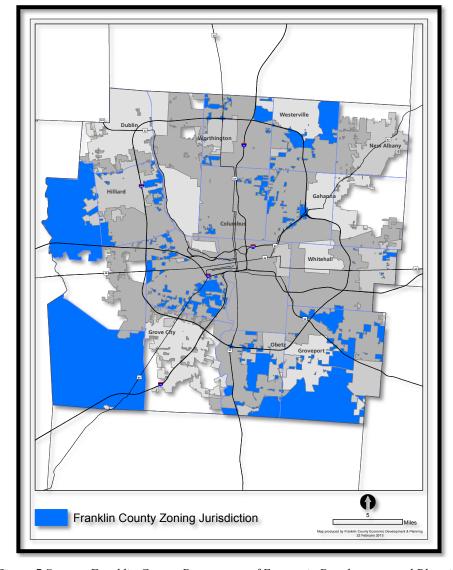


Figure 7 Source: Franklin County Department of Economic Development and Planning

The county also reinforces its support of community gardens through the operation of the Gantz Road Community Garden. This garden, which is located in the Southwest area of Columbus, was established in response to a request for arable land made by a group of Somali refugees. The tract of land that the county owns is now home to three separate gardens, one of which is cultivated by a group of Somali refugees, another by a group of Burmese refugees, and the third by Southwest area residents.⁵⁷

Finally, the Franklin County Economic Development and Planning Department and Franklin County Public Health are both supporting the use of public school land for community gardens. Franklin County planners have started to support this cooperation through planning recommendations made to townships. Additionally, Franklin County Public Health was one of the collaborators in publishing the Franklin County Physical Activity Plan, which includes a recommendation that does not explicitly address gardens, but does encourage joint use agreements between schools and community groups for unspecified purposes. Under the goal of improving infrastructure, the plan recommends that communities "develop shared use agreements for use of school athletic facilities and outdoor learning spaces, etc. with community members and agencies." 59

All in all, the county has made significant progress in supporting the establishment of community gardens, and the FCLFC might continue this progress by offering support and evaluation of ongoing community gardening efforts and their outcomes.

2.2. Urban Agriculture on Private Land

Franklin County zoning and funding streams neither directly target large-scale and commercial urban agriculture operations, nor actively discourage the development of such projects. The zoning resolution's new Community Garden Regulation allows for the establishment of community gardens on privately owned land in the following zones: residential, multifamily, commercial, mixed-use, open space, industrial, institutional and vacant land. These community gardens are permitted to sell only produce grown on-site, provided that they follow the guidelines developed for farm markets in Section 110 of the zoning code. However, the county does not use any specific zoning techniques or language to promote commercial urban agriculture.

Nonetheless, Amanda King, Franklin County Community Development Specialist, voiced support for urban agriculture as an economic development tool, explaining that the department would be receptive to using Community Development Block Grants to fund a larger scale urban agriculture or infrastructure program. King also stated that this type of project would be supported by Community Development's 5-year plan, which establishes a goal of using Community Development Block Grants to expand the local food system. 62

The establishment of private, commercial urban agriculture operations represents another area that could benefit from coordination between various stakeholders. The need for this coordination became clear during an interview with the Director of Franklin County SWCD, who was unaware that community gardens in Franklin County required soil testing prior to establishment. In order to ramp up urban agriculture in the county, various food system sectors will have to collaborate to ensure that prospective urban farmers have access to resources for successful operations.

2.3. Home Gardening and Agricultural Use of Residential Land

Franklin County zoning places minimal restrictions on horticulture in residential areas. The zoning code is silent on the topics of yard waste and lawn vegetation height (unless lawn vegetation is being used as a fence). Additionally, the recently developed Section 115.04 of the zoning code, "Regulation of Apiaries," allows and regulates the establishment of bee colonies on land tracts of any size. This section states the following finding as a partial basis for this allowance: "Honey bees are beneficial to humans and to Ohio in particular, by providing agricultural fruit and vegetable pollination services in tandem with home garden vegetable and fruit production and by furnishing honey, beeswax and other useful products."

The zoning code does not, however, encourage urban homesteads and for-profit agricultural pursuits. Residential tracts of less than 5 acres are neither allowed to host livestock with the intent of husbandry ⁶⁶ nor engage in the sale of homegrown produce or value-added products. ⁶⁷ While this current zoning policy represents a barrier to food sovereignty for urban dwellers, Matt Brown expressed an interest on behalf of the Planning Division of the Franklin County Economic Development and Planning Department in changing the zoning code to allow for raising small-scale livestock in residential areas. ⁶⁸ Further efforts to encourage urban homesteads, hobby farms, and other forms of agricultural production in residential areas may fall under the jurisdiction of a countywide policy on food sovereignty, were such a policy to be pursued by the county.

2.4. Traditional Agriculture and Rural Land Use

Franklin County policies appear to encourage the commercial viability of established farms on tracts of over 5 acres. Not only does the zoning code limit restrictions for on-site processing and sales, but the Franklin County Auditor also runs the Current Agricultural Use Valuation program, which allows commercial farmers to be taxed on their land according to agricultural use, rather than its "highest and best use."

The county does not, however, have policies or programs targeted specifically at farmland acquisition and/or preservation. While the county is in some ways prepared for such a program, with a designated map of prime agricultural land, a zoning code that supports farmland preservation⁷⁰ and the establishment of Farm Villages,⁷¹ and a working farmland tax incentive program, it has not taken the extra step to establish a formal farmland preservation program.⁷² Given that the rapid loss of agricultural land was a major concern that emerged out of the "Central Ohio Local Food Assessment and Plan,"⁷³ the potential for establishing a formal farmland preservation program in Franklin County is worth exploring.

3. Addressing Public Health and Food Access

3.1. Healthy Food, Wellness, and Physical Activity

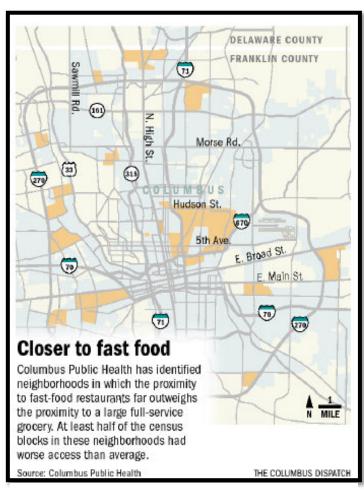


Figure 8 Source: www.dispatch.com

Generally speaking, nutritional health and physical activity do not appear to be priority areas for Franklin County Public Health (FCPH). Not only did I fail to locate a contact in the department to whom I could direct my questions about nutritional policy, but the website for Franklin County Public Health also contains very little information about initiatives related to food and exercise. 74

This is not to say that Franklin County Public Health is not involved with the food system. The department does oversee food safety, solid and infectious waste disposal, yard waste, and water quality. Additionally, the department was involved in developing the "Franklin County Physical Activity Plan," which primarily addresses physical activity, but also outlines some goals that intersect with healthy eating objectives.⁷⁵ However, Franklin County is currently lacking a comprehensive plan to address the intersecting goals of decreasing obesity, increasing physical activity, promoting healthy eating, ensuring access to healthy food, and improving environmental quality.

Columbus Public Health, on the other hand, has leveraged a Preventative Health and Health Services Block Grant to fund the Creating Healthy Communities Project. This project has funded activities such as the creation of a Columbus food access map and the formation of a committee to develop a Franklin County Healthy Food Access Plan. While the goals in this plan will primarily target the Columbus metropolitan area, there has been talk within the committee of establishing goals at the county-wide scale. The scope of the plan was expanded from the Columbus area to Franklin County in order to be inclusive of all agricultural pursuits in the county that could play a role in meeting wellness objectives. However, the Franklin County Healthy Food Access committee does not currently contain any representatives from Franklin County Public Health. Sandy Gill of Columbus Public Health reports that the absence of a county level employee is due to FCPH's recent loss of its Health Educator—a position yet to be filled.

3.2. Food Offerings in Schools and Other Public Institutions

There is very little activity occurring at the county level to encourage the provision of fresh, local, and healthy food in public schools. While Ohio State University Extension does operate a Farm to School program, ⁷⁹ that program has yet to pilot a project in any Franklin County schools.

Resources are available to Franklin County schools that wish to pursue local food sourcing or educational programming, but those resources are offered primarily through the private sector. Franklin County Public Health promotes two statewide organizations that advocate for healthy schools on its website, but the county does not appear to play a large role in the operation of these organizations.⁸⁰ Local Matters, on the other hand, has vigorously pursued opportunities to educate young children about healthy eating through its Food Matters program, but, thus far, has not received support from the county for this program.⁸¹ The Ohio State University Extension's Farm to School website is another resource for school administrators interested in pursuing a healthy and/or local food agenda, but the mere provision of resources represents a passive approach to supporting fresh school food offerings in Franklin County. 82



Figure 9 Source: www.warren.osu.edu

A county purchasing policy that favors local or sustainably produced food might constitute another arrangement that could incentivize the production of local food for local markets. However, discussions with the director of the Franklin County Purchasing Department revealed that the county is prohibited by a U.S. Supreme Court Ruling⁸³ from creating set-asides for any specific type of business, thus inhibiting the county's ability to prioritize the purchase of locally sourced or sustainably grown food. While the county can include language in Requests for Proposals (RFP's) that encourages businesses with minority ownership or sustainable practices to bid, the Purchasing Department is not legally allowed to favor any specific type of business over another when awarding the contract. However, the Purchasing Department does offer post-hoc reviews of bids that are not awarded contracts for the purpose of increasing their competitiveness for future RFP's. Additionally, the county has a representative who educates minority and socially disadvantaged groups on success strategies for doing business with the county.⁸⁴

Overall, the county may benefit from a united agenda that uses schools and other public institutions as catalysts for supporting a strong local food system. The recent salience of the agenda to improve school and institutional food offerings should give the county an easy platform from which to start. As noted, a variety of resources exist at the local, state, and federal levels to support a healthy school food agenda, but leveraging those resources may require some proactivity at the county level.

3.3. Community Education and Empowerment

Given that healthy eating is not a major component of FCPH's agenda, the county does not have any regulations (such as calories on menus or soda taxes) that educate and/or empower citizens to make nutritionally beneficial choices. The FFH Healthy Corner Store Initiative, however, does attempt to empower low-income individuals to make healthy food choices by making fresh produce geographically and financially accessible through three established neighborhood vendors. In carrying out this initiative, Franklin County's office of Community Development partners with United Way, Local Matters, The Ohio State University, and the Columbus Department of Public Health, as well as with Franklinton Gardens to respond to on-the-ground demands of neighborhood residents.

National debates abound over policies that influence food choices through such mechanisms as soda taxes⁸⁵ and calorie counts on restaurant menus.⁸⁶ While the pursuit of such policies may generate a great deal of tension within the community, the contributions of nutritional regulations to public health objectives is worth consideration for any entity pursuing a comprehensive local food agenda.

3.4. Transportation Options for Accessing Food

The Central Ohio Transit Authority (COTA)⁸⁷ serves both rural and urban areas of Franklin County with fixed-route buses that provide access to food retailers. However, the schedules of these services vary from route to route.⁸⁸ Additionally, on-demand services are available to senior citizens and individuals with disabilities via the Mainstream program.⁸⁹



Figure 10 Source: www.flickr.com

The recommendations included in the Franklin County Physical Activity Plan place heavy emphasis on the development of infrastructure for alternative transportation methods, such as walking and cycling. While none of these recommendations refers specifically to healthy food access via bike and walking paths, reference is made to increase the connectivity of these paths to "major activity centers." 90

Conversations with representatives from MORPC's transportation department revealed little involvement of food access considerations in transportation planning. ⁹¹ The creation of multimodal transportation links between residents and healthy food outlets may require a partnership between food system stakeholders and transportation planners to discuss strategies for improving transportation for food access. Examples of such strategies

might include creating a map of the county's grocery outlets in relation to public transportation options, providing on-demand transportation services to connect citizens to grocery stores, and/or conducting a study with the goal of maximizing public transportation utility for accessing healthy food.

4. Fostering Social Equity

4.1. Food Security for Disadvantaged Populations

While no structural solutions have been undertaken by the county to increase food security for populations with greater need (i.e. conducting an infrastructure or transportation study to identify issues of low-income food access, or subsequently drafting a resolution to address such issues), 92 the county has been active in trying to connect low-income populations to healthy food sources. Not only has county government been a driver in the FFH initiative, but the office of Community Development also maintains a database of low-income food resources and meal delivery programs for responding to inquiries from those in need. 93 Additionally, the county offers financial support to HandsOn Central Ohio, who publishes directories of food resources for both individuals and human service providers.

These food access programs represent important efforts on behalf of the county, but a more macro-level/infrastructural approach may be necessary to more comprehensively eradicate food access gaps in the county.

4.2. Business Incentives for Low-income Food Access

The county does not have any economic or business incentive programs specifically implemented to encourage the siting of food retail outlets in low-income communities. The county does, however, have general economic and business development options that can be applied to the establishment of grocery stores in low-income communities. Examples of these options include setting up a TIF through the office of Economic Development, 95 undergoing a conceptual plan review with the Planning Department, 96 or securing Community Development Block Grant funds for predevelopment assistance. 97

Low-income communities in Franklin County could benefit from a program that targets grocery stores and other food retail outlets with economic development incentives, such as Pennsylvania's Fresh Food Financing Initiative, which "provides predevelopment grants and loans, land acquisition financing, equipment financing, capital grants for project funding gaps and construction and permanent finance... [as well as] technical assistance and workforce services to" food retail outlets that site stores in socioeconomically disadvantaged areas.

4.3. Equitable Conditions for Farm Laborers

Farm labor issues do not appear to be a priority for Franklin County. The lack of attention paid to farm labor is most likely due to the fact that it makes up a very small percentage of the county's workforce. Only 0.03% of the county's labor force is employed in "Agriculture, forestry, fishing, and hunting," according to the 2010 census. ⁹⁹ While the county supports the living wage policy established by the state for its farm labor force, little effort is made to specifically address the needs of farm and migrant laborers. ¹⁰⁰

REFLECTIONS AND RECOMMENDATIONS

Policy gaps and opportunities at a glance

The following represent potential avenues of exploration for improving the food policy climate in Franklin County:

- 1. Request that Franklin County Commissioners issue a formal resolution that addresses food as a systemic issue involving public health, ecological sustainability, and economic development. An example of such a resolution is the city of San Francisco's Executive Directive 09-03: "Healthy and Sustainable food for San Francisco," which states, "The City declares its commitment to increasing the amount of healthy and sustainable food." 101
- 2. Incentivize sustainable production techniques to reduce nonpoint source pollution and increase production of value-added specialty crops for local markets.
- 3. Develop a policy and program "roadmap," or other educational resources for farmers who wish to transition to more sustainable growing methods.
- 4. Lend economic development support to farmers and urban agriculturalists through new-entry farmer training programs, policy and programmatic roadmaps, and/or farm labor support programs.
- 5. Develop a print resource or designate a county employee to assist residents with the process of establishing farmers' markets.
- 6. Connect local food businesses to the county Purchasing Department's educational programs for small and minority-owned businesses/encourage local food businesses to bid on county RFP's.
- 7. Establish a program that increases benefits for EBT expenditures at the farmers' market, such as Michigan's "Double Up Food Bucks" program, which matches SNAP benefits redeemed at farmers' markets with tokens worth up to \$20 to spend on fresh produce. 102
- 8. Appoint a solid waste management professional to the FCLFC.
- 9. Establish programs to collect food scraps, incentivize composting, and/or educate county residents about the benefits and practices of composting food waste.
- 10. Undertake a countywide community garden evaluation project.
- 11. Change the zoning code to allow for small-scale livestock production in residential areas.
- 12. Establish a targeted farmland acquisition program or other type of farmland preservation program.
- 13. Increase the involvement of Franklin County Public Health in ongoing healthy and sustainable food access initiatives.
- 14. Leverage local, state, and national funding mechanisms to increase the availability of healthy, fresh, sustainable, and local food in schools and other public institutions.
- 15. Raise public awareness of healthy food choices through such mechanisms as soda taxes and calorie counts on menus.
- 16. Provide on-demand transportation services to low-income neighborhoods for access to supermarkets and other healthy food retail outlets.
- 17. Conduct a transportation infrastructure evaluation project to map multi-modal public transportation access to grocery stores.
- 18. Publish and distribute a map that overlays retail food outlet locations onto a COTA bus route map.

- 19. Provide business/tax incentives and pre-development assistance to fresh food outlets for the siting of stores in low-income communities, such as Pennsylvania's Fresh Food Financing Initiative, which "provides predevelopment grants and loans, land acquisition financing, equipment financing, capital grants for project funding gaps and construction and permanent finance... [as well as] technical assistance and workforce services" to supermarkets and fresh food retailers for locating stores in underserved areas.
- 20. Continue efforts to support and incentivize the creation of an aggregation, processing, and distribution infrastructure for local food and value-added products.

Strengths and limitations of the FCFPA model

The methods used for conducting this audit represent one of many possible strategies for assessing food policy in a given locality. Both the procedures and scale of this particular audit contain inherent strengths and limitations that should be taken into consideration by prospective auditors.

Interview-based research contains both advantages and disadvantages. The primary benefit of interview-based research is the potential to capture parts of the story that might be left out of public documents and other available resources. Additionally, the snowball method of interviewing allows the auditor to take advantage of network connections that form between food sectors and around food issues. This method also creates space for exploring barriers and opportunities that stakeholders perceive in executing food-related initiatives.

However, the interview-based method also contains clear pitfalls. For one, it may be hard for interviewees to produce examples to address the scorecard questions extemporaneously. I attempted to address this limitation by sending interviewees the set of questions I would be asking them in advance. Additionally, face-to-face interviews may inhibit honesty and increase bias, as opposed to a less personal method such as a survey or questionnaire model of data collection. This limitation should be addressed by stressing the emphasis on objectivity and comprehensive evaluation characteristic of the scorecard model. It should also be emphasized to the interviewee that the questions are not meant to criticize, but purely to assess.

Time constraints are often an issue when working with stakeholders who are so engaged with community activities. It is hard to say whether dealing with time constraints is a strength or limitation of the interview model. On one hand, giving contacts the option of scheduling an interview at their convenience eliminates the pressure of completing a survey under a given deadline or attending a focus-group meeting at a designated time. On the other hand, an interview may be perceived by stakeholders as a greater potential time commitment than a survey or questionnaire.

The scale at which the audit is conducted also contains both strengths and limitations. The benefit of conducting the audit at a singular jurisdictional level (such as county, township, state, etc.), is the narrowing of focus that allows for in-depth exploration of audit items. However, an obvious limitation is that narrowing or isolating the scale may cause auditors and/or interviewees to overlook policies at broader jurisdictional levels that produce the desired outcomes the scorecard is intended to evaluate.

Recommendations for future audits

One objective of undertaking this project was to encourage other localities in the Central Ohio region and beyond to pursue a similar assessment. A proliferation of comprehensive food policy evaluations will increase the collaboration and influence potential of local food councils and other food policy stakeholders seeking to transform their local food systems. With this objective in mind, I have

developed the following set of recommendations for those who are interested in conducting food policy audits in their own communities:

- The audit tool should be built around input from key stakeholders. While I found the attached audit scorecard (Appendix A) to be a useful assessment tool, the method of evaluation could take many different forms according to the interests of key community stakeholders. Whether using a survey, scorecard, interview, or other method, auditors should build off of the needs, interests, ideas, and priorities of community groups and/or stakeholders involved in strengthening the local food system.
- Breadth of scale should be taken into consideration as one of the first steps in the audit process. Given the adaptability of the audit model, localities looking to replicate the FCFPA may want to explore the possibility of investigating policies and programs at multiple scales or levels of government. With the prevalence of multi-tiered funding streams, overlapping and intersecting jurisdictional boundaries, collaborative multi-scale projects, and higher or lower level officials with a wide range of expertise, it can become challenging to limit policy analyses to one specific scale or jurisdiction. However, the ability to conduct a multi-tiered analysis will most likely depend on availability of staff, time, and funding.
- A food policy audit should establish benchmarks; not critique ongoing activities. The use of an audit scorecard should foster a measure of objectivity in examining food policy. Auditors should emphasize to stakeholders that the food policy audit is not meant to criticize their work, but rather to aggregate information about ongoing food-related policies and programs in a given area. Stakeholders will most likely respond more positively to a constructive approach than a perceived smear campaign. Additionally, the language contained in reports and other audit-related documents should be relatively free of value judgments.
- The audit is a constructive way to identify gaps in the food system. The audit tool should include a wide range of possible programs and policies that could help to strengthen the local food climate. By examining not only what is, but also what could be, localities will be able to better form a vision for future food policy work. Inspiration for items to include in the audit tool may come from best practices in other localities, demands of food system stakeholders in the given locality, local and national experts on food system planning and policy, etc.
- Face-to-face interviews are ideal for fostering fluid and constructive discussion with food system stakeholders. However, time constraints, resource constraints, and limited personnel are all very real issues for organizations that may be conducting a food policy audit, as well as other stakeholder organizations involved in the audit process. ¹⁰⁴ Therefore, it is wise to emphasize to interviewees that face-to-face discussion is preferable, while also giving them the option of responding to audit questions via phone, email, fax, or any other less time-consuming method.
- Stakeholder organizations should be made aware of the benefits of participating in a food policy audit. The audit is not only beneficial to the conducting body (i.e. food council or other food interest group), but also beneficial to the stakeholder organizations whose input is sought. These organizations may want to use the findings of the audit for their own strategic planning, outreach, collaboration, and/or educational purposes.
- Contacts should be given the opportunity to approve any documents before they are made public. Individuals and organizations may want to remain anonymous and/or correct errors and

miscommunications before information about their programs or statements is made available to the general public. 105

- Consider the following or similar resources to help frame the language of your audit in terms of best practices:
 - Neuner, Kailee, Sylvia Kelly, and Samina Raja. 2011. Planning to Eat: Innovative Local Government Plans and Policies to Build Healthy Food Systems in the United States. Buffalo, NY: The State University of New York. Available at: http://cccfoodpolicy.org/sites/default/files/resources/planning to eat sunvbuffalo.pdf
 - ➤ The Harvard Law School Food Law and Policy Clinic. 2012. *Good Laws, Good Food:* Putting Local Food Policy to Work for our Communities. Available at: http://blogs.law.harvard.edu/foodpolicyinitiative/files/2011/09/FINAL-LOCAL-TOOLKIT2.pdf
 - The American Planning Association. *Planning a Healthy, Sustainable Food System.*Available at:
 http://www.planning.org/nationalcenters/health/pdf/apapchfoodsystemplanning.pdf
 - ➤ PolicyLink. *Tools for Healthy Food Access*. Available at:

 http://www.policylink.org/site/c.lkIXLbMNJrE/b.7718791/k.4526/Tools_for_Healthy_Food_Access.htm
 - ➤ American Farmland Trust. *The Farmland Information Center*. Available at: http://farmlandinfo.org/
- Repeat, repeat! The audit establishes an initial benchmark by which to judge your locality's progress, so repeating the audit periodically can tell you how far you've come. Resources permitting, consider the option of setting up a timeline to repeat the audit every 5-10 years. This repetition will not only allow you to gauge your progress, but also give you the opportunity to reevaluate and recalibrate your policy priorities based on emerging issues and needs.

Appendix A

	Franklin County Food Policy Audit Scorecard 1						
	ltem	Agency, Department, or Organization ²	Resource(s)	Answer	Notes		
	1. Pro		ainability, and Community Foo	d Security			
		1.1. Sys	temic Approaches				
1	Does the locality support or participate in a Food Policy Council?	MORPC		Yes			
2	Does the locality have a policy or goal to reduce its community environmental "foodprint"?	Planning		No	Not clearly stated in the Board of Commissioners' "Core Principles"		
3	Does the locality have a policy that its citizens have a "right to food security"?	Community Development		No	Commissioners have not adopted clear resolution regarding food security		
4	Does the locality have a declaration of food sovereignty?	Community Development		No	Commisioners have not adopted clear resolution regarding food sovereignty.		
		1.2. Supporting	Sustainable Agriculture				
5	Does a policy or program exist to encourage transition to low-spray, sustainable, or organic agricultural methods, to reduce human and environmental exposure to potentially harmful chemicals?	Soil and Water Conservation District		No			
6	Is there a local policy or program that offers incentives to farmers to switch to more sustainable growing methods?	Soil and Water Conservation District		No			
7	Is there a local government policy or preference for local agencies to purchase low-spray, sustainably grown, or organic food?	Purchasing Department		No	Supreme court ruling		
8	Does the locality have a policy, program, or goal to reduce nonpoint source pollution from agricultural operations?	Soil and Water Conservation District	http://www.dnr.state.oh. us/tabid/8856/Default.asp x	Yes	Franklin County SWCD is responsible for administering the statewide Agricultural Pollution Abatement Program (APAP): Ohio's Agricultural Pollution Abatement Program (APAP) may provide farmers with cost share assistance to develop and implement best management practices (BMP) to protect Ohio's streams, creeks, and rivers. This program has been successful in helping to alleviate concerns associated with agricultural production and silvicultural operations which can create soil erosion and manure runoff.		
9	Does the locality have a policy, goal or program to manage the harmful effects of animal manure?	Soil and Water Conservation District	http://www.dnr.state.oh. us/tabid/8856/Default.asp x	Yes	APAP also covers this.		
10	Does the locality support an organization or agency that can advise farmers on sustainable growing practices?	Soil and Water Conservation District, OSU Extension	http://oeffa.org/index.ph	Yes	Ohio Ecological Food and Farming Association (OEFFA) is in Franklin County and serves this purpose. However, Franklin County does not support OEFFA financially.		

The structure and many of the questions for the Franklin County Food Policy Audit Scorecard were taken from the "Food Policy Audit Tool" developed by the University of Virginia's Institute for Environmental Negotiation, available online at http://ien.arch.virginia.edu/UVA%20Food%20Audit.htm.

Entities listed represent entities consulted. Information in the "Notes" column does not necessarily reflect the opinions of all organizations listed.

	1.3. Encouraging Production for Local Markets						
11	Does the locality have a clear goal that supports the production and distribution of local food?	Planning		Yes	Not one of the commissioners' strategic priorities, but in the FC ZR, section 1.11 item g of zoning resolution has some language, and various comp plans have started to evolve and address local food more, such as plans at township level (Madison twp. For example has the most local food type of recommendations). County is starting to move toward including local food in comp planning, encouraging schools along with local matters to get community or school gardens, etc.		
12	Does the locality have economic development goals to support regional food production?	Economic Development, ECDI		No	No formal, specific written goals that say it is important, but is important from an institution standpoint, as it is talked about quite a bit. The need is discussed, but no policy that says they will do it on a regional level. Those discussions could emanate from MORPC.		
13	Is there a support system to supply existing farmers with steady and seasonal farm labor?	Economic Development		No			
14	Are there local government or other programs to inspire and train new farmers, including assistance to immigrants who may come from farming families?	Economic Development		No			
15	Is there a USDA-inspected community cannery, kitchen, or other processing facility open to local farmers, food entrepreneurs, and the public?	Economic Development, ECDI		No	ECDI may pursue the possibility of the Food Fort kitchen incubator becoming USDA-inspected. Additionally, this might be one of the outcomes of the Weinland Park project.		
16	Does the locality support an organization, agency, or individual who is able to provide farmers with technical assistance regarding financial solvency, and/or regulatory compliance?	Economic Development, OSU Extension		No			
		1.4. Creating I	Markets for Local Foods				
17	Does the locality publish or support a public guide to local food?	Local Matters		Yes	Local Matters has Fresh Connect for local food businesses in and around Franklin County		
18	Is there a local government policy recommendation for purchase of local food when available?	Purchasing Department		No	Supreme court ruling		
19	Are there economic development programs, incentives or other tools for retailers to favor purchasing local food?	Economic Development,		Yes	Econ development Supplies dollars to third party lenders such as ECDI. ECDI and Local Matters are trying to work out a collaboration that would allow ECDI clients to purchase from the Greener Grocer at a discount.		
20	Are there financial or other programs to support or incubate food-related businesses?	Economic Development, ECDI		Yes	ECDI is supported by the county to administer such programs. They also refer clients to other organizations that can help them with food-related business development.		
21	Does the locality have a policy to allow local farmers' markets or tailgate markets?	Economic Development, Planning Department, ECDI		Yes	The state oversees local markets. Franklin county regulates these markets at the local level. A lot of laws on the books are fairly archaic and never needed to be updated until there was an uptick of farmers markets, food trucks, and food carts. These laws need to be reviewed and updated to help promote small businesses and farmers.		

22	Does the locality provide institutional support for local farmers' markets or tailgate markets?	Economic Development, ECDI		No	
23	Is there economic development support for businesses that provide	Economic Development,		No	Discussion of this as part of the Weinland Park Project.
24	Does the locality provide tax incentives, leasing agreements, or other incentives to support development of businesses using locally produced food?	Economic Development, ECDI		Yes	Not supported by Econ Devt. But they do give money to ECDI and then they provide loans to businesses. Econ Devt. Helps vendors set things up an help them manage it but that is it.
25	Does the locality support, or are there programs for, mobile farm stands and food carts?	Economic Development,		Yes	ECDI has a program that allows prospective vendors to rent food carts for the purpose of testing out business ideas. They also have incubators for food trucks at the Food Fort and the Dinin' Hall. Local Matters also has the Veggie Van progam that delivers fresh produce to low-income communities.
		1.5. Making Local Food	Accessible to Low-Income Popu	ılations	
26	Does the locality support the purchase/use of Electronic Benefits Transfer (EBT) cards to provide low-income access to farmers' markets?	Community Development, Local Matters, OSU Extension, Economic Development		Yes	Community Development has worked with orgs to do that, especially with Healthy Corner Store Initiative to get debit card and food stamp capabilities. Has also partnered with local matters to do it at Farmers' Markets. Grocery stores and many FM's support EBT, but WIC and senior nutrition are not as prevalent.
27	Does the locality support the policy of \$2 or \$3 for every EBT dollar, when the EBT is used at grocery stores or market venues for fresh, local food?	Community Development, Local Matters,OSU Extension, Economic Development		No	
28	Do farmers' markets and/or grocery stores accommodate WIC coupons, Senior Nutrition coupons, or EBT machines?	Community Development, Local Matters, OSU Extension, Economic Development		Yes	The ones that the county works with do.
		1.6. Emergency Prep	paredness and Food Provisions		
29	Does the locality have an emergency preparedness plan that includes contingency plans for short-term interruptions of food deliveries?	Emergency Management & Homeland Security, Mid-Ohio Food Bank		Yes	Franklin County Emergency Management and Homeland Security has plans in place to feed citizens as referenced in the Franklin County Emergency Operations Plan. MOF has a fully supported agreement to work with the Red Cross and the County Commissioners Office to use our fleet and staff to help transport food in an emergency situation.
30	Does the locality support the provision of a central directory of all emergency food providers?	Mid-Ohio Food Bank		Yes	HandsOn of Central Ohio (http://handsoncentralohio.org/) functions as the centralized referral tool for feeding services in the county, but hunger-relief agencies self-select to be part of the HO database.
31	Does the locality support coordination and cooperation among emergency food providers?	Emergency Management & Homeland Security, Mid-Ohio Food Bank		Yes	Service coordination/cooperation of Emergency food providers is done through the MOF application process and the support services they provide to partners in their network and the collaborative work done at the community level between providers.

32	Does the locality employ strategies for increasing food donations for emergency provisions and food banks?	Emergency Management, Mid-Ohio Food Bank Emergency Management		Yes	The Department of Emergency Management and Homeland Security has a Volunteer and Donations Management Plan that includes soliciting donations during emergencies to be directed to the MOF for distribution. The County provides a small amount of funding for Mid-Ohio
33	Does the locality support a method, structure, or storage facility for donations of fresh foods to emergency providers?	& Homeland Security, Mid-Ohio Food Bank		Yes	Foodbank to acquire, store and distribute fresh foods to Franklin County EFPs and low-income residents.
		1.7. Diverting a	nd Recycling Food waste		
34	Does the locality support a policy or program to divert a given percentage of bio-waste away from landfills?	Ohio EPA		No	There is a State Solid Waste Management Plan that establishes a recycling rate of 25%, but this rate is for all recyclables, not just biowaste. At the state level, there's also a restriction on landfill disposal of yard waste. The state's composting regulations are intended to provide means for diverting bio-wastes.
35	Does the locality support a compost pick-up program that processes food waste for recycling? Or does the locality provide another method of recycling/disposing of non-edible food waste?	Ohio EPA		No	
36	Does the locality allow for storage and pick-up of compostable items at commercial establishments?	Planning, Ohio EPA	Franklin County Zoning Code	Yes	Don't specifically address food waste. There are concerns about collecting compost from the general public, more of a case by case situation of how they are doing it. Compost could not be stored outdoors with no protection. There are regulations on dumpsters but not explicitly addressed.
37	Does the locality support commercial composting or anaerobic digester facilities for food waste recycling?	Ohio EPA		Yes	Franklin county has an anaerobic digester (the Quasar digester) that can take food scraps. The City of Columbus assisted with the establishment of the facility, by agreeing to use it their services for treating some of the City's sewage sludge. This ensures that the facility is available for food wastes too.
38	Does zoning code allow community gardens to bring food waste from off-site sources for composting?	Planning, Ohio EPA	Franklin County Zoning Code, Community Garden Zoning Regulation, "Urban Agriculture, Composting and Zoning: A zoning code model for promoting composting and organic waste diversion through sustainable urban agriculture"	Yes	Not addressed explicitly, so yes. Compost piles are not considered structures. No regulations on size of composting. Until recently, state wide composting regulations would not have allowed localities to authorize this. Most zoning codes are silent on composting at all. Others limited it to onsite wastes. The City of Columbus code still prohibits waste from outside the community garden or they will consider it manufacturing.
39	Does the locality support educational programs encouraging backyard composting of food wastes?	Ohio EPA		No	Some municipalities in Franklin County run educational programs, but they are independent of county support.
40	Does the locality support programs to encourage synergies for byproduct use among food producers and processors?	Soil and Water Conservation District, Ohio EPA		No	

Resource available online at: http://www.epa.ohio.gov/portals/34/document/guidance/GD%201011_UrbanAgCompostingZoning.pdf

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41	Does the locality have a purchasing policy requiring that all disposable serviceware is compostable?	Purchasing Department		Yes	
42	Does the locality provide economic or tax incentives for establishment of facilities for processing/recycling food waste (composting, anaerobic digestion, etc)?	Economic Development, ECDI, Ohio EPA		Yes	Locality does not provide dollars directly. However, ODNR has market development grants that aim at these efforts. They provide grants to companies, and Economic Development is the conduit through which grants get to companies. Franklin County Economic Development facilitates the process.
43	Does the locality's board or council include a solid waste management or planning professional?	Ohio EPA		No	FCLFC does not include a solid waste management professional.
44	Does the locality support a program to redistribute viable uneaten food from commercial establishments to hungry, malnourished, or low-income populations?	Mid-Ohio Food Bank		Yes	MOF provides a program that coordinates and supports the redistribution prepared food to soup kitchens and shelters. The County does not fund this program, and does not support (through funds or policy) other food re-distribution programs. There is discussion of including such a program in the Weinland Park operations.
		2. Zoni	ng and Land Use		
		2.1. Urban Ag	riculture on Public Land		
45	Does the locality clearly allow the use of public space or land for nonprofit community food gardens?	Planning, Local Matters	Franklin County Zoning Code, Community Garden Zoning Regulation	Yes	Yes, through the proper channels. Gantz rd community garden owned and operated by the county, in their 3 rd year.
46	Is the locality currently employing or considering a "joint use" agreement to open the use of school land for food production (school gardens, community gardens, community urban farms)?	Planning, Local Matters	Franklin County Zoning Code, Community Garden Zoning Regulation, Franklin County Physical Activity Plan	Yes	Schools have their own boards, so FC can't make them do anything, but comprehensive plans are starting to recommend that townships work with schools to start community gardens or school gardens. The FCPAP recommends joint use with community organizations and agencies, which could include gardens.
47	Does the code allow for and support protection of open space for community gardens?	Planning, Local Matters	Franklin County Zoning Code, Community Garden Zoning Regulation	Yes	Open space, yes, but not necessarily for community gardens. Always support protection of open space and natural areas.
48	Does the code allow for temporary and conditional use of abandoned lots for neighborhood gardens and/or urban farms?	Planning, Local Matters	Franklin County Zoning Code, Community Garden Zoning Regulation	Yes	Yes, in the Community Garden section of code.
49	Does the loccality sponsor or work with an area community land trust or land bank in setting aside land for community or nonprofit gardens, or gardens where low-income residents can grow produce for sale?	Planning	Franklin County Zoning Code, Community Garden Zoning Regulation	No	Franklin County treasurer just started a new land bank program. Acquiring vacant abandoned properties that are tax delinquent. Once they do that, there are 3 options: demolish existing structure and rebuild, rehab structure, or just demolish structure and leave it as a vacant lot.
50	Does the locality minimize height restrictions on thru-way vegetation? If low vegetation is preferred, does the locality give preference to edible landscaping?	Planning	Franklin County Zoning Code, Community Garden Zoning Regulation	Yes	From a zoning standpoint, anything in public right-of-way is outside of county control. City Engineers, ODOT, and twps might have height restrictions.

	2.2. Urban Agriculture on Private Land						
51	Does the locality utilize zoning tools (such as overlays or subdistricts), or include language in the zoning code to support commercial urban agriculture operations on small plots and residential lands?	Planning	Franklin County Zoning Code	No			
52	Does the locality utilize zoning tools (such as overlays or subdistricts), or include language in the zoning code to support non-commercial community gardens on private lands?	Planning	Franklin County Zoning Code	Yes	Community Garden Section		
53	Does the locality allow for on-site sale of products by urban agriculture operations?	Planning	Franklin County Zoning Code	Yes	Don't support urban ag, so no. But community gardens are allowed to sell products grown in the garden on-site, as long as they comply with farm market regulations.		
54	Do zoning codes pertaining to urban agriculture on private lands allow for construction of associated structures?	Planning	Franklin County Zoning Code	Yes	Size restrictions on accessory buildings for residential gardens and community gardens. Community garden code does allow for non-building ancillary structures of "a reasonable size."		
55	Does the locality support a program to facilitate soil testing on private lands for conversion to community gardens? Or does the locality require raised beds for community gardens?	Soil and Water Conservation District, Planning		Yes	Zoning Code requires soil testing at community garden sites, and raised beds if soil is not found suitable for gardening.		
56	Are there funding streams for urban food production projects, such as Community Development Block Grants?	Economic Development, Community Development, Planning, ECDI		Yes	Use Community Development Block Grants for Healthy Corner Stores and Community Garden grants for building new and expanding existing community gardens. If a larger scale urban ag program were to be proposed, the office of Community Development would be receptive for using CDBG's for it. In 5 year plan to expand local food system with CDBG grants so if an infrastructure project came along they would definitely consider it.		
		2.3. Home Gardening and	Agricultural Use of Residential I	Land			
57	Does the zoning code allow small-scale beekeeping on residential land?	Planning	Franklin County Zoning Code, Beekeeping Zoning Regulation	Yes	Beekeeping resolution		
58	Does the zoning code have language that supports residential "farm" animals: chickens, goats, roosters, etc.?	Planning	Franklin County Zoning Code	No	Dairying and animal husbandry are permitted on lots greater than 1 acre and less than 5 acres until 35% of a subdivision is developed. In other words, farm animals are not allowed on lots less than one acre, and are only allowed on lots less than 5 acres in minimally developed areas. However, FC is considering broadening the allowance of ag and subsequently livestock to allow for them on smaller parcels of land.		
59	Does the zoning code allow for the construction of structures associated with backyard agriculture?	Planning	Franklin County Zoning Code	Yes	Mostly just sheds in residential areas.		
60	Does the zoning code minimize restrictions on lawn vegetation height?	Planning	Franklin County Zoning Code	Yes	Code does not address vegetation height unless vegetation is being used as a fence.		
61	Does the zoning code allow for the sale of homegrown produce on residential property?	Planning	Franklin County Zoning Code	No	Not unless residence is greater than 5 acres, then sale has to comply with farm market standards.		

62	Does the zoning code allow for the sale of value-added products on residential property?	Planning	Franklin County Zoning Code	No	See above.
	Does the locality have limited restrictions on yard waste (compostables) in residential areas?	Planning	Franklin County Zoning Code	Yes	Yard waste not addressed in zoning code.
	(100 pour le la		riculture and Rural Land Use		is a nation of a said cooperation of the said cooperat
64	Are there regulations allowing flexibility for food producers to engage in minimal on-site processing?	Planning	Franklin County Zoning Code	Yes	Those practicing agriculture are allowed some on-site processing.
65	Does the zoning code allow for the sale of unprocessed farm products on agricultural lands?	Planning	Franklin County Zoning Code	Yes	Must comply with Farm Market restrictions.
66	Does the zoning code allow for the sale of value-added products on agricultural lands?	Planning	Franklin county Zoning Code	Yes	Must comply with Farm Market restrictions.
67	Does the locality offer working farmland tax incentives, such as agriculture/forestal districts?	Planning	Franklin County Zoning Code, http://www.franklincountyaudit or.com/real-estate/cauv	Yes	Franklin County Auditor has Current Agricultural Use Valuation program for commercial agriculture operations to ensure that they are paying tax rates based on agriculture, rather than highest and best use.
68	Does the locality have a policy or program (such as conservation easements) to support land conservation for food production?	Planning	Franklin County Zoning Code	No	
69	Are there creative leasing or financing models to reduce start-up farming debt?	OSU Extension, Economic Development, ECDI		No	
70	Does the locality have a map of its prime agricultural lands for conservation?	OSU Extension, Planning	Franklin County Zoning Code	Yes	Not an acquisition program or any similar thing. Some areas are highlighted on future use maps for twps, etc. Just for reference.
71	Does the locality limit development potential in prime agricultural land through purchase of development rights, transfer of development rights, establishment of agricultural districts, or through other means?	Planning		No	PDR is legal in Ohio, but Franklin County has no current PDR program. Farm villages might qualify here as a sort of conservation development program. Office is currently working on conservation development programs for Darby Watershed.
			lic Health and Food Access		
			Wellness, and Physical Activity		
72	Does the locality express a concern or goal for improving public health?	Franklin County Public Health	Franklin County Physical Activity Plan	Yes	
73	Does the locality mention a goal to reduce obesity and/or chronic illness?	Franklin County Public Health	Franklin County Physical Activity Plan	Yes	
74	Does the locality have an overall wellness plan?	Franklin County Public Health	Franklin County Physical Activity Plan	No	Does have the FCPAP, which does not adequately address issues of healthy food, food access, or healthcare.
		3.2. Food Offerings in So	chools and Other Public Institution	ons	
75	Does the locality clearly allow, support, or advocate for Farm to School (or similar) programs?	Franklin County Public Health, Local Matters, OSU Extension		No	Ohio State Extension has a Farm-to-School program, but they have not yet initiated a project in Franklin County, specifically.
76	Does the locality have other provisions for school purchasing of local or organic foods?	Franklin County Public Health, Local Matters, OSU Extension		No	

77	Does the locality clearly have a policy to reduce availability of junk food in schools and other public buildings (e.g. vending machines and purchasing options)?	Franklin County Public Health, Local Matters, OSU Extension		No	Not at the county level, but the school system in Columbus has policy for putting healthier foods and beverages in vending machines.		
78	Do the schools have a policy or program to educate cafeteria workers on preparation of fresh, local food and/or nutrient-rich food?	Franklin County Public Health, Local Matters, OSU Extension		No			
79	Is the locality clearly encouraging or supporting the inclusion of food- based lesson plans in schools?	Franklin County Public Health, Local Matters, OSU Extension		No	Local Matters has the Food Matters program, which brings food- based lesson plans to children up to the second grade level, but, thus far, they don't feel they have been specifically supported by the county.		
80	Does the locality clearly encourage and/or directly support establishment of school garden programs at all levels of K-12?	Franklin County Public Health, Local Matters, OSU Extension		No	County supports establishment of community gardens, and the FCPAP encourages joint use of public institution land for gardens, but there is no specific policy or program to support or encourage school gardens.		
		3.3. Community E	ducation and Empowerment				
81	Does the locality encourage that chain restaurants provide consumers with calorie information on in-store menus and menu boards?	Franklin County Public Health		No			
82	Does the locality have a clear tax or other strategy to discourage consumption of foods and beverages with minimal nutritional value, such as sugar sweetened beverages?	Franklin County Public Health		No			
83	Does the locality have educational/promotional programs to discourage the use of Supplemental Nutrition Assistance Program (SNAP) benefits for sodas, high sugar, and low nutrient foods?	Franklin County Public Health		No			
84	Does the locality develop media campaigns, utilizing multiple media channels (print, radio, internet, television, social networking, and other promotional materials) to promote healthy eating?	Franklin County Public Health		No			
85	Are community members involved in the organization of markets or other food opportunities?	Economic Development, Community Development, Local Matters		Yes	To the extent that with Healthy Corner stores they work with on-the- ground organizations working with community members, asking for their input and reaching out to them and evaluating how the program is working for them. Local Matters is working with community members to establish a cooperative grocery store on the Near East Side of Columbus.		
	3.4. Transportation Options for Accessing Food						
86	Do safe biking and walking paths exist between neighborhoods and food stores and markets?	MORPC	MORPC Bikeways Inventory (http://arcserver.morpc.org/w ebmaps/BikeWayPlan/index. html), Franklin County Physical Activity Plan	Yes			
87	Does the locality have a bus service that connects neighborhoods directly with food stores and markets, requiring no more than one bus change?	MORPC	http://www.cota.com/, http://www.ridedata.com/	Yes	Yes in the sense that COTA and DATA routes will serve some communities with access to a food store or market, with zero or one transfer.		

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88	Does the locality have a low-cost taxi or ride-sharing service that connects neighborhoods directly with food stores and markets?	MORPC		No	There is no formal low-cost taxi or ride-sharing service with this goal. There is general taxi service, which is not low-cost.			
89	Are transportation services available in rural as well as urban areas?	MORPC	http://www.cota.com/, http://www.ridedata.com/	Yes	Rural areas are served by fixed-route service. Additionally, there is on-demand transit service to urban and rural areas.			
90	Are transportation services available at multiple times of the day and evening?	MORPC	http://www.cota.com/, http://www.ridedata.com/	Yes	COTA fixed-route service sometimes runs into the midnight hours. DATA service is available multiple times during the day. Frequency varies by route.			
			Franklin County Physical Activity Plan, http://www.morpc.org/transpo rtation/bicycle_pedestrian/pla nsandstudies.asp, http://www.morpc.org/info_ce nter/dataport/411_plan_library		The County may not have a specific plan, but MORPC and City of Columbus have various plans, as do many local governments			
91	Does the locality have a bike path or sidewalk plan?	MORPC	.aspx	Yes	within Franklin County.			
	4. Fostering Social Equity							
		4.1. Food Security f	or Disadvantaged Populations					
92	Does the locality have a policy to provide access to quality food for all citizens, especially those with greater need?	Economic Development, Community Development, Local Matters, Mid-Ohio Food Bank		No	Commissioners have talked about doing a policy resolution on this, but all land use plans for the last 2 years and all moving forward have food planning recommendations and policy items in them. Community Development partners with the Planning Department to do infrastructure and program components of plans.			
93	Has the locality done any infrastructure, transportation or other studies to identify issues of low-income neighborhoods gaining access to quality food, in rural as well as urban areas?	MORPC, Economic Development, Community Development, Local Matters, Mid-Ohio Food Bank		No	Community Development keeps track through GIS and use USDA data on food deserts. That data is used for decision-making when administering grants. Economic Development is aware of the issue, but has not done anything specific. No specific plans, but as part of community and township planning, this is done on a case by case basis.			
94	Does the locality have a policy or program to support stores that offer fresh produce, meats, dairy, and eggs to low-income populations?	Economic Development, Community Development, Local Matters, Mid-Ohio Food Bank		Yes	Fresh Foods Here is a Healthy Corner Store Initiative undertaken by United Way, Local Matters, OSU and the Columbus health Department with some of the funding coming from Franklin County. which is hoping to expand. The program has been working in three stores in the Franklinton and Harrisburg Pike areas, but now that they have done program evaluation, they are looking to expand the area that they cover.			
95	Does the locality have a system for directing/referring people in need of food to the places that can help?	Economic Development, Community Development, Local Matters, Mid-Ohio Food Bank		Yes	answers for this. They have a database of farmers markets, healthy corner stores, food banks and LifeCare alliance food pantry and meals on wheels program. Franklin County offers financial support to HandsOn Central Ohio, and HandsOn offers public directories and helplines to those in need via their website, as well as for-purchase directories of regional human service providers for institutions.			

	4.2. Business Incentives for Low-Income Food Access							
96	Does the locality have an expedited development and/or permitting process for grocers that will provide healthy, local foods in underserved locations, in rural as well as urban areas?	Economic Development, Community Development, Planning		No				
97	Are there any regulatory incentives, such as relaxed zoning requirements or tax credits, that can facilitate new stores in underserved areas?	Economic Development, Community Development, Planning	Franklin County Zoning Code	No	The county does not offer its own tax abatement, but there is always opportunity to set up a TIF through economic development office, which is case by case. Nothing specifically for grocery stores or food production.			
98	Does the locality offer any predevelopment assistance to developers to expedite the review process for grocery stores in underserved areas?	Economic Development, Community Development, Planning		Yes	A conceptual plan review is offered to site developers, so then when they submit their plan all the kinks will have been worked out. Also, this would be an allowable cost under CDBG's.			
	4.3. Equitable Conditions for Farm Laborers							
99	Does the locality support a living wage policy for all those who work, including migrant farm labor?	Community Development	Ohio Revised Code	Yes	Supported but not made by the county.			
100	Does the locality provide or ensure that training for farm workers is provided in a comfortable training environment, and that the training is adequate and in their native language, and that someone is available to answer farm worker questions in their own language?	Economic Development, Community Development		No	county owns Gantz Rd. community garden, and some ethnic minorities have been able to reserve plots in that garden through county-established Somali and Burmese Refugee outreach groups.			

Appendix B

Initial Contact Email

From: Caitlin Marquis Sent: Monday, July 9 Subject: Request for interview regarding Franklin County food policy
Dear Mr./Ms,
My name is Caitlin Marquis and I am a summer intern at the Mid-Ohio Regional Planning Commission. I am currently working on a project that will help the Franklin County Local Food Council (FCLFC) determine the county's policy climate for developing and conducting food-related projects.
I am reaching out to you because you're identified as someone who is likely to understand certain county-level policies and initiatives that could affect the work of the council. I would very much appreciate the opportunity to meet with you and discuss your perspective on a short, direct list of policy and program related questions.
Attached to this email, you will find an Excel document that contains the list of questions I would like to discuss with you. These questions are simply intended to aggregate information about existent policies and projects in Franklin County; they are not meant to criticize the work of any individual or organization. Findings will only be shared with the members of the FCLFC. If the FCLFC wishes, for any reason, to make this information public, your permission and approval will be sought.
Please look over these questions and, if possible, give me one or more date(s) and time(s) before the end of July when you will be able to meet for a brief (no more than 30-45 minute) discussion.
Although I would prefer to meet with you in person, I understand that time constraints may present challenges in arranging a face-to-face meeting. If this is the case, you have the option to fill in the spreadsheet to the best of your knowledge and send it back to me. If you choose to do this, please reattach and send me the completed spreadsheet along with answers to the following questions:
1. How do you see your agency, organization, or affiliation contributing to the creation of a thriving Franklin County local food system?
2. What policies or programs, if any, would you like to see implemented toward strengthening the Franklin County local food system?
If you feel that someone else in your organization might be better equipped to answer these questions, I would greatly appreciate your help in identifying and contacting that individual.
If you have any questions or comments, feel free to email me at or call me on my cell phone at ###-###.

Thank you very much for your time, and I look forward to hearing your thoughts.

Appendix C

Contact Follow-up Email

From: Caitlin Marquis Sent: Monday, July 16

Subject: Follow-up: Still looking for your thoughts on Franklin County policies and programs

Hello,

I am contacting you because I have not yet heard back from you about discussing county-level policies related to your professional area of interest. I am still very eager to hear your thoughts and I would very much appreciate if we could arrange an interview as soon as your schedule allows.

As I stated in the email I sent to you on Monday, July 9th, I am seeking your help in conducting an audit of Franklin County policies and programs that could influence efforts to build a thriving local food system in our region. Please refer back to that email for the specific policy items that I am investigating and respond with a date and time before the end of July that you can set aside for a 30-45 minute face-to-face discussion. If you would prefer to share your thoughts with me over the phone, or simply respond to the questions I originally sent you with an email, those actions would be helpful to me as well. What's most important is that I hear your perspective as someone who works within a specific sector of the Franklin County local food system.

Again, please let me know if you believe that there is another member of your organization who might be more familiar with the policy landscape in your area. Likewise, if a professional contact from outside of your organization springs to mind, I would be interested in getting in touch with that individual. I would be happy to contact any of your colleagues directly if you wouldn't mind replying with their email addresses and/or phone numbers.

Thank you for your attention and, again, if you have any questions or comments, feel free to email me at ______ or call me on my cell phone at ###-####.

NOTES

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- Newsom, Gavin. 2009. "Executive Directive 09-03: Healthy and Sustainable Food for San Francisco." Web.
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- ¹⁴ Mid-Ohio Regional Planning Commission. 2010. "Central Ohio Local Food Assessment and Plan." Web. June 2012. http://www.morpc.org/pdf/CentralOhioLocalFoodAssessmentAndPlan2010.pdf
- ¹⁵ "Resource Management Program." *Ohio Department of Natural Resources*. Web. August 2012. http://ohiodnr.com/tabid/8856/Default.aspx>

- ¹⁸ Franklin County Zoning Resolution. Amended and readopted 2011. Franklin County Economic Development and Planning Department. Available online at <www.franklincountyohio.gov/edp>.
- ¹⁹ Blacklick-Madison Area Plan. 2011. Franklin County Economic Development and Planning Department. Available online at http://www.franklincountyohio.gov/commissioners/edp/planning/blacklick-madison/documents/Blacklick-MadisonAreaPlan-fullweb.pdf.
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- ²² Food Fort Columbus. Web. August 2012. http://thefoodfort.wordpress.com/
- ²³ Kramer, Bob. Personal interview, 31 Jul. 2012.

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¹⁶ Fish, Jennifer. Personal Interview. 1 Aug. 2012.

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⁶⁶ With the exception of sparsely settled areas. The Franklin County Zoning Resolution states: "Dairying and animal and poultry husbandry are permitted on lots greater than one (1) acre but not greater than five (5) acres until thirty five percent (35%) of the lots in the subdivision are developed with at least one (1) building, structure or improvement that is subject to real property taxation or that is subject to the tax on manufactured homes under section 4503.06 of the Ohio Revised Code. After thirty five percent (35%) of the lots in the subdivision are so developed, ongoing dairying and animal and poultry husbandry shall be considered a non-conforming use pursuant to section 303.19 of the Ohio Revised Code. No new dairying, animal or poultry husbandry shall commence on such lots after thirty five percent (35%) of the lots are developed with structures."

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⁷⁰ According to Ohio State University Extension Fact Sheet CDFS-1263-98, Purchase of Development Rights (PDR) "is a voluntary program, where a land trust (see OSU Extension Fact Sheet CDFS 1262-98, Land Trusts) or some other agency usually linked to local government, makes an offer to a landowner to buy the development rights on the parcel. The landowner is free to turn down the offer, or to try to negotiate a higher price. Once an agreement is made, a permanent deed restriction is placed on the property which restricts the type of activities that may take place on the land in perpetuity. In this way, a legally binding guarantee is achieved to ensure that the parcel will remain agricultural, or as open (green) space forever." Available at http://ohioline.osu.edu/cd-fact/1263.html.

⁷¹ According to the Franklin County Zoning Resolution, "Farm Villages permit higher density house lots clustered in the most environmentally appropriate portion of a farm, while surrounding itself with permanently preserved open space, intended to be retained as farmland. The development rights to the preserved open space are permanently and irreversibly transferred to the farm village lots, in return for which the open space is protected by permanent deed restrictions, plat restrictions and open space easements."

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¹⁰⁵ Stakeholders consulted for this audit were given two separate opportunities to make corrections to any names mentioned or statements made throughout the document. All corrections were made upon request.