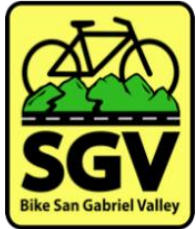


March 11, 2016



Metro Community Relations
One Gateway Plaza, MS 99-13-1
Los Angeles, CA 90012



VIA EMAIL: communityrelations@metro.net

Re: Feedback on Metro's Public Participation Plan (PPP)

Dear Metro Office of Community Relations,

We the undersigned thank you for the opportunity to comment on Metro's Public Participation Plan (PPP). We commend Metro's Office of Community Relations for updating the PPP and adhering to the Federal Transit Administration's Title VI standards of the Civil Rights Act of 1964.

After reviewing Metro's PPP, in theory, it is on the right track to ensuring broad community engagement. That said, many of Metro's strategic elements listed on page 11 are great on paper and in practice, we believe the USC Program for Environmental and Regional Equity (USC PERE) report, "An Agenda for Equity: A Framework for Building a Just Transportation System in Los Angeles County,"¹ and Prevention Institute's Healthy, Equitable, Active Land Use (HEALU) Network platform² can serve as a valuable resource for fulfilling Metro's methodology of public participation. For instance, Metro should continue bridging connections with community-specific projects by working with community development organizations that have deep relationships and insights into community specific needs and opportunities, have planning expertise and explore unconventional - but effective - approaches like popular education programs to explain harder to decipher technical details.

To summarize a section on community engagement from the USC PERE report, the four following principles can help ground Metro's public participation process:

- Ensure the surrounding neighborhoods and the fabric of civic engagement organizations are involved in all stages of the planning process, especially users with the most need who rely on walking, bicycling, buses and trains to meet their daily needs.
- Ensure that community input is reflected in the research, policy alternatives, and project outcome indicators.
- Ensure that any conflicts represented in community dialogue are worked through and not just avoided.
- Last, ensure that partnerships are sustained from project to project.

¹ USC Program for Environmental and Regional Equity. (2013). An Agenda for Equity: A Framework for Building a Just Transportation System in Los Angeles County. https://dornsife.usc.edu/assets/sites/242/docs/Executive_Summary_Agenda_for_Equity_PERE_A.pdf

² Prevention Institute. (2016). Healthy, Equitable, Active Land Use (HEALU) Network platform. *Forthcoming.*

In addition, Prevention Institute’s forthcoming report can provide guiding points for an equitable public participation process:

- Target investments for community-based “anchor” organizations to build and sustain community engagement in land use processes.
- Invest resources for anchor organizations to elevate the scope and scale of existing community-level training and capacity building initiatives (including collateral materials) to maximize their collective impact and improve health equity outcomes.
- Develop inclusive outreach and public engagement standards modeled on the City of Seattle’s *Inclusive Outreach and Public Engagement* approach.
- Develop and promote early consultation and engagement practices for major land use projects that are grounded in a health equity ethos. Government agencies, the private sector, and community-based anchor organizations should collaborate to ensure healthy equitable and active land uses.
- Prioritize engagement in “high need” or “disadvantaged” communities following Seattle’s example; that city’s Department of Transportation devotes particular attention to engaging people in neighborhoods with high concentrations of immigrants, walking seniors, children, low-income households, and traffic injury “hot spots.”
- Infuse an ethos of equity into high-visibility development initiatives like the development of Transit Oriented Communities. This initiative can explicitly prioritize healthy, equitable development for the communities that need it most; this includes protecting low-income communities from the negative health impacts of displacement.
- Pilot innovative land use policies and projects in low-income communities of color, and apply the lessons learned from successful efforts to drive policy change.

Specifically, Metro should continue strengthening stakeholder engagement on project selection and investment allocation.

A particular best practice we have seen at Metro, and we applaud, is the Corridor Advisory Group (CAG) process on page 24 and 25, particularly on Metro’s ExpressLanes efforts. We commend the CAG for ensuring diverse and meaningful public engagement and efforts with local community based organizations. Jessica Meaney, Managing Director of Investing in Place, and several other community-based organizations were invited to a participant in Metro’s Express Lanes CAG and appreciate the opportunity to be involved in all stages of the project process and have the opportunity to impact project and funding outcomes. We believe the CAG process can be improved with not only engaging stakeholders for the entire project timeline, but to sustain and grow the relationships with stakeholders in the area for the entire lifecycle of the project.

Los Angeles County Metropolitan Transportation Authority (Metro) is unique among the nation’s transportation agencies. It serves as transportation planner and coordinator, designer, builder and operator for one of the country’s largest, most populous counties. More than 9.6 million people – nearly one-third of California’s residents – live, work, and play within its 1,433-square-mile service area. Metro is responsible for the continuous improvement of an efficient and effective

transportation system for Los Angeles County for all types of travel - highways, buses, trains, local roads and sidewalks. Because transportation shapes communities' access to health-promoting resources like jobs, housing, healthy food, safe places to play and be physically active, and more, Metro has a unique opportunity to shape the health of Angelenos. Prioritizing engagement and investments in “high need” or “disadvantaged” communities would infuse an ethos of health equity into Metro’s work and set a precedent for other regions across the nation.

With an unprecedented opportunity to invest in our transportation system given Measure R and a potential 2016 transportation sales tax measure, we believe it’s critical that Metro continue to grow and expands its efforts to engage the public in a meaningful and equitable way by structuring their engagement process based on best practices. With the fact that many Spanish-speaking and low-income communities use our public transportation as a primary method of getting around, and over half of Los Angeles County will be Latino by 2040, we highly recommend Metro continue to emphasize access to multi-lingual resources, holding meetings that are flexible around working hours, measure the effectiveness of community outreach, and to encourage meaningful participation especially for those who rely on walking, bicycling, buses and trains for their daily trips.

We appreciate Metro’s commitment to achieving their objective of sustaining quality relationships with stakeholders early and being accountable to the public participation process. Please contact Jessica Meaney at (213) 210-8136 or jessica@investinginplace.org with any feedback or questions on this letter.

Sincerely,

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