



Via Email

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Re: The Metro Equity Planning and Evaluation Tool (EPET)

Dear Metro staff:

The undersigned members of the Coalition for Environmental Health & Justice ("CEHAJ") write regarding the proposed application of Metro's Equity Planning & Evaluation Tool ("Equity Tool") to the Long Beach-East LA Corridor Mobility Investment Plan ("Investment Plan"). CEHAJ has engaged in this new process from the beginning because we were encouraged by Metro's stated commitments to an equitable community-centered process. When Metro staff introduced the Equity Tool we hoped it would be used to shape the Investment Plan into a community-driven and transformational document. Unfortunately, the proposed use of the Equity Tool described during a March 2nd presentation to the Equity Working Group did not live up to our expectations or the Equity Guiding Principle adopted by the Task Force. We call on Metro to use the Equity Tool to ensure that the Investment Plan will improve the health and livelihoods of corridor residents rather than to merely prepare a report detailing where the Task Force's commitments to equity have fallen short.

Our Equity Guiding Principle states:

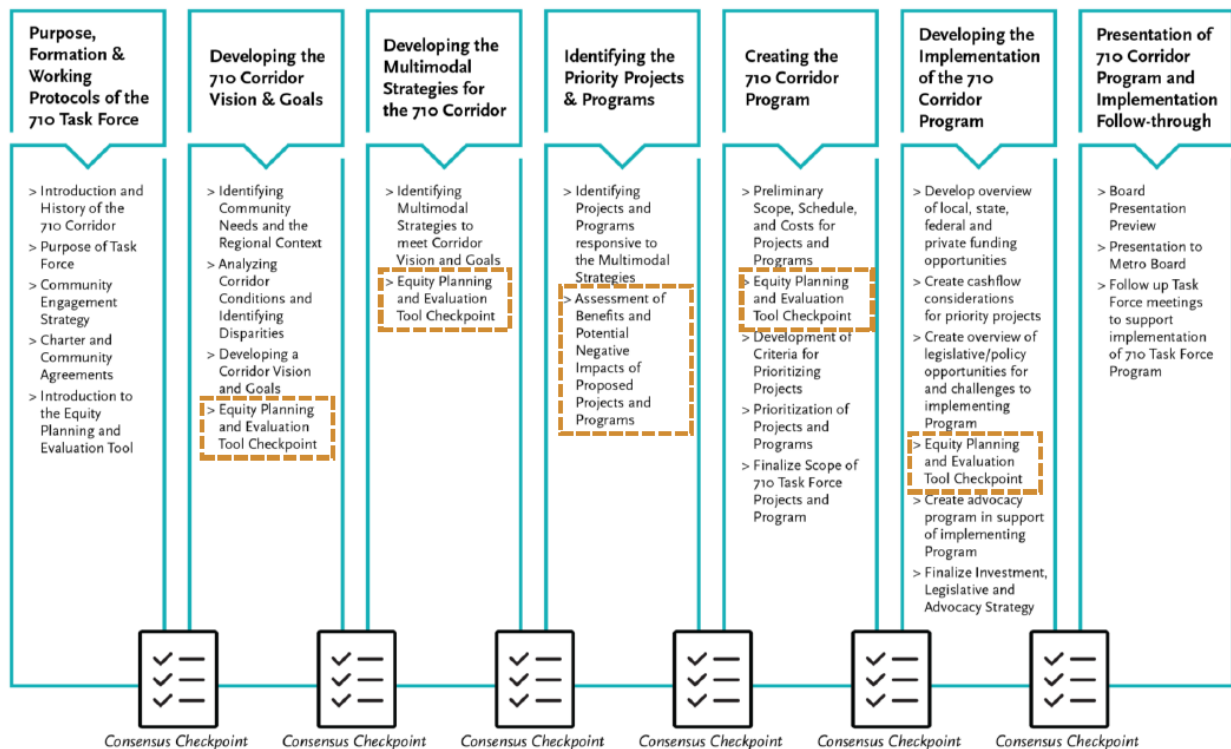
The I-710 South Corridor Investment Plan is founded on the Guiding Principle of Equity a commitment to: (1) strive to rectify past harms; (2) provide fair and just access to opportunities; and eliminate disparities in project processes, outcomes, and community results.

The plan seeks to elevate and engrain the principle of Equity across all goals, objectives, strategies, and actions through a framework of Procedural, Distributive, Structural, and Restorative Equity, and by prioritizing an accessible and representative participation process for communities most impacted by the I-710.

Using the Equity Tool to prepare a report fails to make the equity framework described in our Guiding Principle actionable and instead keeps it theoretical. If Metro is truly committed to using this process to address historic and ongoing harms, build trust, and shift power (as required by Restorative, Distributive, Procedural, and Structural Equity), we need Metro to move beyond words and definition and intentionally use the Equity Tool to guide decisions and take action.

The proposed application of the Equity Tool falls short

The Equity Tool was introduced as a tool that would help the Community Leadership Committee (“CLC”) and the Task Force “develop and implement strategies, projects, programs and investment priorities in a manner that provides more equitable outcomes.” In numerous meetings it was described as a planning tool that would be applied to ensure equity was incorporated into the process and the outcomes. For example, at the first Equity Working Group meeting last March, staff identified at least four instances where the Equity Tool would be used to adjust decisions, as needed, to ensure all forms of equity are being advanced:



Based on this and other explanations of the Equity Tool, we understood that the tool would do more than guide the Investment Plan process, but also inform its outcomes. This is consistent with how similar racial equity tools have been described by leading organizations in this space, such as the [Local and Regional Government Alliance on Racial & Equity](#) (GARE).

We were then surprised to learn that instead of applying the tool to the proposed Project List, staff planned to prepare a report to answer the Equity Tool questions and solicit Equity Working

Group feedback on the report. While assessments and reports on their own can be useful, without a clear way for the results of that analysis to change the Investment Plan, or aspects of it, then this report will not advance more equitable outcomes as anticipated by the Guiding Principles. We believe the Equity Tool still has the potential to be effective, but Metro must commit to making changes to the Investment Plan, including the Multimodal Strategies, Projects and Programs List, to ensure equitable outcomes.

The Equity Tool should be used to hold the Task Force accountable

The Equity Guiding Principle calls on us to carry out this work through a structural equity framework, which requires the “1) Evolution of decision-making bodies to reflect the communities they serve [and] 2) Restructuring of organizational systems and hierarchies to empower historically marginalized groups.”¹ This lens requires us to hold ourselves and Metro accountable to the communities that have been harmed and continue to be harmed by transportation infrastructure and to create new systems that shift power to impacted communities. Using the Equity Tool solely as a reporting mechanism or an internal assessment, without more, robs us of the full potential of this Tool as a means to achieve structural equity.

In order to achieve this, the Equity Tool should include an accountability mechanism for changing the Investment Plan to avoid inequitable impacts. This step is part of other similar equity tools, such as the [Racial Equity Tool](#) developed by the City of Portland. Step 5 of their Tool requires the development of racially equitable strategies **and** confirming or modifying outcomes. Their tool explicitly encourages staff to change their proposals and mitigate unintended consequences after applying Steps 1-4 of the tool. While the need for change might become apparent before reaching Step 5, this final step creates a clear moment where staff must not just study existing or possible inequities, but do something to change them.

A similar requirement or ‘step’ in Metro’s Equity Tool would create the important opportunity to ask all the questions contained in the Equity Tool and then act on the answers. Without that opportunity, we risk the application of the Tool becoming a performative exercise. For example, if the Task Force looks at a proposal on the initial list of project and asks, “how will your proposed action address root causes to decrease racial/ethnic, income, and/or other inequities, increase positive outcomes, and reduce negative impacts on historical marginalized communities,” and the answer is “it won’t,” the Equity Tool should empower the Task Force to then do the work to ensure that the project is removed or changed so we can answer “yes.”

The entire Task Force must join the CLC and Equity Working Group in these conversations about equity

We were also concerned following the March 2 Equity Working Group by how siloed the application of the Equity Tool was from the other processes and spaces in the Task Force. This siloing creates an additional burden on the CLC and the Equity Working Group, which hasn’t been attended regularly by all Task Force members equally. This concern about the siloing of

¹ LB-ELA CP Initial Project List: Glossary of Terms (Dec. 27, 2022).

equity was raised at the very first Equity Working Group meeting, where members shared concerns that the ideas coming up in that space would be siloed from the other Task Force conversations.

The Equity Tool itself asks that all stakeholders be part of these conversations: “The questions are best answered by a diverse group, including people with a variety of demographic backgrounds, lived experiences, and expertise.” However, if only a subset of stakeholders (who are predominantly people of color) regularly engage with the Equity Tool’s questions, there is no way for the full Task Force to grapple with what the community engagement and data shows, what information or stakeholders are missing, or how the proposal addresses (or fails to address) inequities.

Finally, to the extent that the Equity Guiding Principle is intended to guide all the work of the Taskforce, CLC and the Equity Working Group it must also be applied equally to each of the decision-making and advisory roles that participants are being called upon to engage in. This means that these principles must also be applied when weighing options for the Zero-Emissions Truck (“ZET”) Working Group. While the ZET Working Group has been described as a separate process with its own timeline and set of objectives, the same parties are being called upon to lend support in that process. Members of CEHAJ understood that our participation in this working group was part and parcel of our work at the Task Force and CLC and that the same guiding principles would apply. To the extent Task Force and CLC members are being asked to help guide seed investments for such ZET projects, Metro should ensure there is an equally strong application of equity principles and tools to that decision-making process as well.

The application of the Equity Tool should be led by equity experts

While we appreciate and recognize the amount of time and effort that has been put into the Equity Working Group calls, we believe these concerns reflect a lack of expertise in incorporating equity into planning processes. Metro’s Office of Equity and Race, which was created within the last three years, has led a lot of the work to develop a new equity-driven planning process for Metro to collaborate with impact community members and address the harms from previous I-710 planning processes. Metro should direct sufficient resources to the Office of Equity and Race so that it may continue and expand this work.

We know developing a new process for an area as large and varied as the I-710 corridor is an enormous undertaking and can require the support of third party consultants. However, if any consultants are to be hired and tasked with the responsibility of implementing the Equity Tool, they should not be (only) planning experts, but also have deep knowledge and experience with implementing equity into project proposals. Given that many infrastructure consultants are the same companies who in the past contributed to harmful project proposals such as the I-710 expansion project, these same consultants should not be funded with public money to lead the application of equity tools. Not only does their active participation in past processes indicate that they do not have equity expertise, but they must rebuild trust with harmed communities as much as transportation agencies like Metro or Caltrans.

In sum, we ask that Metro bring in a consultant who has equity expertise to lead the implementation of an Equity Tool consistent with our Guiding Principles, and with a stronger mechanism for accountability.

Sincerely,

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