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Dear Megan,

Thank you for inviting public review and input into MAPA's draft Civil Rights Policy. What follows is feedback from Policy Research & Innovation (PRI), an Omaha-based nonprofit that conducts research, promotes policies and unites diverse communities to create the kinds of places we all want to live in.

It is PRI's position that all city, regional and state agencies must embody the three fundamental core values of equity, transparency and accountability. This of course applies to MAPA and its transportation planning as well. These three core values should be clearly described and embedded in the people, the culture and the actions of MAPA. Additionally, the specific policies and practices that will be implemented in order to demonstrate allegiance to these core values should be clearly spelled out.

To effectively embody equity, MAPA's board, committees, staff and administration must reflect the full diversity of our community, to include race, gender, class, age, disability and sexual orientation. Furthermore, and in specific references to civil rights, there is a difference between assuring non-discrimination and the much broader, pro-active goal of ensuring equity in transportation policies and practices. We want to know precisely how MAPA will support and expand transportation civil rights and reduce transportation apartheid through equity planning and practice. MAPA's civil rights plan should explicitly lay out how MAPA will expand both organizational and transportation equity as a core value and as a set of practices to achieve the desired outcome of equity.

In specific reference to transportation equity, MAPA must pledge to ensure equity in both access to transportation and actual mobility. Transportation equity planning and practices must address:

1. The proportion of income for low-income versus high-income metropolitan area households that is spent on transportation and related expenses, and how fast those expenses are increasing for each group;
2. The percentage of capital funds going to bus transit versus the percentage of public transit riders who use buses;
3. The proportion of transportation spending generated in our metropolitan area "downtowns" versus spent downtown;
4. Urban sprawl and the potential "spatial mismatch" between available jobs and the low-income workers seeking those jobs;
5. Hiring practices for transportation construction and related projects.

After equity, the next two most important core values and characteristics of any public agency, including MAPA, are transparency and accountability. MAPA has to be able to ensure that its transportation planning processes and practices comply with its own civil rights policy and with the city's, state's, and nation's civil rights laws. Transparency is about effective, public disclosure of who did what, when, where, and how. Transparency is closely linked to accountability because a transparent agency shows the public who is responsible for what, when and how things are done so that as a result, the public is able to hold the "who" accountable if something goes wrong. In order to be fully accountable, MAPA must implement processes of oversight, monitoring, and evaluation as well as appropriate procedures to hold specific public officials to account when things go wrong.

Specific Questions for MAPA to Consider in Civil Rights Planning and Practice:

1. What is the ultimate purpose of detailing these civil rights policies and procedures? Who are the intended audiences of this policy? What are the desired outcomes associated with MAPA's civil rights policies?
2. Why isn't race considered an important demographic to be profiled alongside age, disability, poverty and zero vehicle households (Chapter 2; note that race was a demographic factor considered in the past by MAPA in designing the Environmental Justice area described on p. 12)? It would be illuminating to transparently demonstrate the absence or existence of any racial disparities in transportation access, a critical civil rights issue. Additionally, it would be helpful for MAPA to provide statistical breakdowns of Omaha's public transportation users by race, class, age, gender, disability and limited English proficiency, alongside national averages for comparison.
3. What strategies does MAPA use to achieve "inclusive," "ongoing," (p.2) "open and full participation" (p.8) for all residents in planning? How is this desired outcome measured?
4. How does MAPA define the degree to which a population is "well-served by transit" (pp. 10-11)?
5. In terms of reflecting the diversity of our community, how is the principle of equity exemplified by the MAPA board and committee membership? By administration, management and staff make-up? (Specifically, who is on the board, and how were they selected? Who is on the MAPA committees—in particular the influential Transportation Technical Advisory Committee—and how were they selected? Who makes up administration, management and staff, and how were they selected? Who exactly are the two people who will be working together to perform the duties of Title VI Coordinator, and how were they chosen?
6. Why are the responsibilities of Title VI Coordinator divided into two positions? How are those responsibilities split? And, what effect will that split have on achieving the principles of equity, accountability and transparency? Will these individuals work in the same physical space? If not, why not?
7. Does the fact that the Project Selection Committee is composed entirely of members of the influential Transportation Technical Advisory Committee, pose any issues to fulfilling the core values of equity, transparency and/or accountability? If so, how?
8. How will MAPA's civil rights policy be monitored, and who will ensure these policies and procedures are carried out (e.g., will MAPA dedicate an individual as "watchdog," empowered to hold the agency accountable for civil rights)?
9. How will the relative success of MAPA's civil rights policy be evaluated? What kind of enforcement procedures will be in place?
10. Who will be held accountable if any of these policies and procedures is flouted? What are the expected consequences to public officials for failure to enforce these policies?
11. What specific steps is MAPA taking to ensure complete transparency in both its civil rights practices, and in its system of accountability?

Thank you again for the opportunity to provide feedback to MAPA's draft civil rights policy. We look forward to hearing from you soon.

Regards,



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