February 28, 2020

To:
Vicki Arroyo,
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Georgetown Climate Center
Transportation and Climate Initiative
climate@georgetown.edu

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Secretary
Massachusetts Executive Office of Energy
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Assistant Secretary,
Massachusetts Department of
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TCI Outreach and Communications
Workgroup:
Chris Bast
Chief Deputy
Virginia Department of Environmental Quality

Re: Policy Design Community Development for an Equitable Clean Transportation Community Participation Processes

Dear TCI decision-makers and Georgetown staff;

2BridgeCDX– Building Resourceful Initiatives Developing, Growing, Empowerment where we support constituency residents in communities to reduce institutionalisation and increase interdependency in community life.

EnVision...The 2BridgeCDX work builds Community Partnerships to help model communities by promoting a culture of civic service through engaging and empowering in increasingly global and diverse communities which dramatically increases the number of resident's public engagement, talent, and treasures that builds a stronger and more resilient inclusive community to meet the challenges in the 21st Century moving forward with combating community deterioration, defending human and civil rights secured by law or not.

This critique sets out a vision for the Mid-Atlantic Transportation Climate Imitative (TCI) active citizenship commitment with marking a new beginning for government agencies to build collaborates that help local residents build stronger and thriving communities for all. Where agencies commit to listening to constituency grass-roots street level residents in communities where they live. Commit to working with local communities through national, state and local participatory two-way conversations across the Mid-Atlantic states not through proxy special interest and agenda nonprofit organizations. These organizations are not community engagement practitioners rather campaign, special interest, agenda directors, leaders that formulate and run marketing campaigns that targets working in the guise of "grassroots" or "community-based", groups furthermore these organization are routinely out of there lane being without specialized public engagement proficiency.

In changing the wind, going against the tide

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In this spirit, we are committed to matching this ambition and driving forward the TCI community empowerment agenda. Communities are the bedrock of our society. We at 2BridgeCDX is proud to empower its membered residents through education in championing participatory participation meaningful engagement and two-way involvement with local affected residents who play active roles in helping to shape, make and strengthen the places they call home in collaboration with businesses, special interest groups, agenda non-profit organizations, faith organizations, civil society, and volunteer groups.

Being part of intentional processes of community inclusion and participatory engagement is crucial to any organization doing "equity" work. The two synopsis describes the results of initial research with representatives of public agencies to include an inclusionary framework to help public agencies explore;

1. how open they are to local "affected" community influence in relation to, and
2. agencies potential to respond to "affected" community influence.

A few months ago, a program officer and I were talking about the lack of funding that goes to communities-of-color-led nonprofits (only about 10% of philanthropic dollars go to organizations of color). He shook his head in sympathy and frustration, sipping on his coffee. "There has to be a way to level the playing field," he said. This was probably the third time that quarter I had heard that phrase uttered by a funder.

The problem with the equity vs. equality graphic circulating across the web referenced in Environmental Justice and TCI Tool-kits.

http://culturalorganizing.org/the-problem-with-that-equity-vs-equality-graphic/

•   The problem with the graphic it has to do with where the initial inequity is located. In the graphic, some people need more support to see over the fence because they are shorter, an issue inherent to the people themselves. That's fine if we're talking about height, but if this is supposed to be a metaphor for other inequities, it becomes problematic.

•   For instance, if we return to the school funding example, this image implies that students in low-income Communities of Color and other marginalized communities need more resources in their schools because they are inherently less academically capable. They (or their families, or their communities) are metaphorically "shorter" and need more support. But that is not why the so-called "achievement gap" exists. As many have studies have shown, it should actually be termed the "opportunity gap" because the problem is not in the abilities of students, but in the disparate opportunities they are afforded. *It is rooted in a history of oppression, from colonization and slavery to "separate but equal" and redlining. It is sustained by systemic racism and the country's ever-growing economic inequality.*

Equity gets shoehorned in as an afterthought along with Collective Impact

Collective Impact (CI) has been spreading around the country like creamy natural peanut butter on warm toast. Meanwhile, Equity has been spreading like organic artisanal jelly. And now it seems that the two are converging into a delicious PB&J sandwich of social justice. Practically all the pitfalls above are affected directly by funding.

Equity has been a buzzword, but anytime we talk about Equity and don't mention how funding is allocated, then we are not talking about Equity at all. If you want communities of color to be genuinely involved with Collective Impact, then fund them. Not token "here's 5/10K for you to attend a few meetings coordinated by this backbone organization and provide input" funding, but actual, significant funding, the amount you would fund a mainstream backbone organization. There are plenty of organic CI efforts led by communities of color. Fund them to do their work, and stop forcing them to conform to the mainstream CI efforts. And don't just fund backbone organizations. You need to support the rib organizations simultaneously. A backbone is worthless if the ribs are broken and the pancreas and liver are not functioning.

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These folks are generally paid huge salaries for their "professional" activism, get over-inflated grants for logistics and "organizational capacity building", and struggles may become further exploited as "poster struggles" for their funders. These accomplices established by activists whose careers depend on the agenda and special interest "issues" they work to address. These nonprofit capitalists advance their careers off the struggles they ostensibly support by working again in the guise of "grassroots" or "community-based" minority, and/or low-income affected communities. More so the fact is they quite frankly… don't give a damn!

The nonprofits special interests "Greater Goodwill's Charity Racket"

These special interests, agenda based, for the greater good organizations and nonprofits which fondles millions of dollars in government funds, donations and grant funding then pays its top campaigns, managers, directors, administrator etc., compensation, while simultaneously paying grass-roots communities zero ($0). Yes, through-out TCI engagements these organizations community engagement processes are outstand able oppressive. While grass-roots groups make massive contributions yet are herded and shepherd like cattle as signatories whom organizations fail to represent one community-based "affected" resident.

This goes to the "engagement" as grass-root community-based groups are not seen as "partners" to the proxies that speak on behalf of communities without asking. It really is appalling behavior and the elephant in the room needs to be addressed as community-based grass-roots organizations are not seen as a "Contributor" of providing our input, time, knowledge and experiences that this is not considered as such yet they are roused to only being a signatory as the lessor in following those listed the facilitators and most likely of community's authentic work.

The guiding question, "What do marginalized-communities-led organizations need in order to protect and advance their communities?" It's a great conversation. But need to be reminded that this question again places the burden on marginalized communities to take care of systemic injustice and the ally nonprofit industrial complex. All of us need to be involved, all of us have responsibility to create the world we want, not just communities that are most affected. We keep focusing on the "needs" and not the assets of diverse communities.

It is so ingrained in our racist culture to see marginalized communities as weak and in need of protection, even as we expect them to lead the fight. This paradox leads to communities being under-resourced, yet we still demand they be involved with every fight. Someone put it this way: "We have the same expectations of these [marginalized-communities-led] organizations as we do with mainstream orgs, but we just remove a zero or two when we cut the check to them." They are guilty as they bypass the people who are most affected by issues, engage in funding larger issue based, community-oriented organizations that tackle broader agenda issues, and hope that miraculously the people most affected will help out in the effort, most likely for free."

Through a Lens of Intersectionality

In our work on intersectionality and in disadvantaged communities the whole purpose of intersectional is to listen to different kinds of individual identities that overlap with a number of marginalized groups experience multiple, overlapping threats of discrimination that involve the construction of racial inequality with economic tools themselves justified with racism– The idea that people just not like yourself rather ones whose differences between race, income and ethnicity.

Intersectionality is a framework for conceptualizing a person, group of people, or social problem as affected by a number of discriminations and disadvantages. It takes into account people's overlapping identities and experiences in order to understand the complexity of prejudices they face.

Why it's not just about "equity" in designing a equitable policy.

For very good reasons, "equity" is a hot word in the philanthropy and nonprofit worlds. The last few years, and in particular the recent bizarre political process, have illustrated how much there is a need for addressing fairness and equitable justice in the American political system, and in our society as a whole and in nonprofit world.

However, as excited as we are, we've been seeing a lot of instances where there is significant talk around equity, and yet the implementation falls far short of what the concept actually is. We call this "Dissonance In Equity" (DIE).

The "equity" exhibited in this TCI process "all" a concept of "Leveling the Playing Field" is very present in this sector in our society, like cats or skinny jeans, and we don't really question it at all. Equity which is also arguably a Collective Impact organization which we call a phenomenon the "Illusion of Inclusion." The service nonprofits engaged in these TCI processes to participate in DIE;

1. A foundation, businesses, special interest group, or a nonprofit incorporates equity language into its marketing material and strategic plans. Yet its practices for awarding funding remains unchanged, and many smaller, community-based nonprofits and projects, especially those led by communities of color, still have little chance to access funding. Especially organizations at the table in this TCI process which I will not name at this juncture.
2. We assume that it is a good thing. If we just make it so that competitions are "fair," then the people/groups with the most merit, the best ideas and proposals, will win. If we can just make the field more even, then everyone will be able to play the game and everything is good.
3. A foundation has "capacity building" among its priorities, but the Big Greens proxy organizations that are funded will not award funding to organizations that do not yet have sufficient capacity, based on funder-initiated definition of capacity. This leaves out hundreds of nonprofits led by marginalized communities that are doing good work that have measurable outcomes but don't fit neatly into the standard definition and it's easy doing *stealth* work.
4. Equity is delivering different things to different people based on what they need. When ones speak of a clean future we leave no one behind when black communities already are behind and "Equality", means correcting the "inequality" already done to us in bringing us up to a level to get to equity when black communities first bear the most burdens and disparities of "Environmental Inequality", or there would be no need for the Civil Right Act. And, therefore we gave you "equity" so pull yourselves up by your bootstraps.

We see this as commonly being misunderstand in the distinction, that it is all about "Equity". Environmental inequality focuses on broader dimensions of the intersection between environmental quality and social hierarchies that then is "equity". For us it's Justice, Equality and Equity.

Additionally, a 'do no harm' approach to inequality is an insufficient solution for us is absurdity. Like the distinction of "Public Engagement" is factually top down and if you are not the host community then you are a proxy and this therefore is not bottom up (being spoken for not at the table or on the call) in being a certified IRB Professionals.

The Ideology of TCI Nonprofits Engagement

Service nonprofits — and the related programs and institutions that support them — also have an ideological purpose. Don Lash writes about the relevance of the idea of the Italian revolutionary Antonio Gramsci to the child welfare system in his book When the Welfare People Come. His analysis applies to service nonprofits as well.

One of Gramsci's insights was to explain how capitalist society is able to maintain its legitimacy, despite the yawning chasm between those with immense wealth and those who suffer deep poverty.

Key to his argument are the concepts of "civil society" and "political society." By "political society," Gramsci meant those state institutions that rule through force, such as the prison system, the courts and police. By "civil society," he meant those aspects of the state that rule through consent (which differs from the way many today use the term to mean "voluntary associations").

The issue with this process is not about communities rather the special interests, Ej organizations, nonprofits — through the services they provide and the media and other campaigns they design — explicitly and implicitly reinforce and perpetuate certain ideas. For example, in their work they frame what is the "appropriate" solution to social problems.

The problems are funding and donating to these organization that then hires a lobbyist, a policy manager, a coordinator, a campaign manager etc. — in building a mass movement capable of occupying our local governmental agencies and Congress. And because there is a hegemonic idea about the cause of these problems — namely individual bad luck or irresponsibility — it makes a collective solution seem "irrational."

Finally, nonprofits also reinforce an ideology about the most appropriate way to bring about change — namely, working for a nonprofit. Then on the ground street level community-based leadership is then seen as rocking the boat of conformity. And who benefits when good-willed people committed to social justice get drawn into a system that they depend on for their livelihood and that incentivizes not rocking the boat? The people who stand to lose the most when powerful social movements rock the boat — in other words, corporations and the wealthy.

There are two large nonprofits that stand-out in this TCI processes and these special interests, for the great good organizations perpetuating these ideas, writing the curricula and hosting convening, forums, trainings etc., are themselves proxy nonprofits not representative of people "affected" residents and what has been witness out of this process that we have been involved in over the past twenty-two months; while in the room we as affect residents are not at the table while the lives of "affected" communities are being marginalize for the benefit of big greens proxies agendas and source funding, and it could not be more prevalent as it concerns TCI community engagement processes. We will leave it local affected communities to share their "Exploitation & Co-optation", stories.

Nonprofits who co-opt are only there to advance self-interests as these "allies" seek to impose their agenda, as a "TCI Tool-kit", when they proclaim allyship when in actuality It's structural patronization that is rooted in the same dominion of hetero-patriarchal white supremacy.

This helps to illustrate what is meant by the phrase "nonprofit-industrial complex": the web of nonprofits that interacts at different points to avert the worst social catastrophes, perpetuates the ideology that explains poverty and hardship as a matter of individual responsibility, and, when need be, justifies coercive and violent elements of the state.

Perfect example with the TCI equity and environmental community groups are the model example of the ally industrial complex that has been established by activists whose careers depend on the "issues" they work to address while they praise themselves as to submitted random comments, and sign-on letters that are unsystematic in meaningful effective engagement participatory participation processes. Yet, established as the hierarchy while minority, low-income communities most affected are none the aware. Such infantilization and utilization of marginalized communities must stop.

2BridgeCDX role includes providing a framework for community collaborations that produce evidence-informed programs and community standards that inform local policy decisions. We think most people and/or organizations in this sector mean well. But good intention is no longer enough; and when it is coupled with a paternalistic philosophy that infantilizes diverse communities, it is incredibly destructive.

Let's stop finding solutions, and start funding solutions by investing significant amounts in organizations led by the people who know first-hand the inequity they are trying to address. Stop using our communities as lantern.

Community-based organizations are tired of being asked to attend more forums, summits, focus groups, answer more surveys, rally our community members, only for our opinions to be dismissed.

The statutory sector and partnerships that are open and responsive to community influence increasing community capacity to influence public agencies.

Such framework has been given the working title "EchoVoice". This reflects the fact that it is a response to the development of the Axis of Influence, a framework for community networks to assess and increase their capacity to influence public governmental agencies by consultation, meaningful participatory engagement, through partnerships.

1. 'EchoVoice' is a framework which helps community groups and networks to assess and improve the influence they have on governmental agencies and partnerships. The 'two axes in 'Echo & Voice' plot existing capacity to influence against how influential members of the community feels it is. It can be used to: assess and monitor community influence, prompt discussion and debate within groups and help plan how to become more influential as it pertains to the subject matter.

2BridgeCDX is an independent consultancy specializing in community engagement, community development and active citizenship. 2BridgeCDX works across the nation offering expertise in facilitation, training, research, evaluation and consultancy. *"One of the key components is getting people to the table to speak for themselves."* Accountability with Community Led Based Initiatives and principles having measurable successes and what we term as the "Community-led centered community participatory collaborative-participation meaningful engagement and involvement of the "affected", community in a 2BridgeCDX **CeDap** processes that involve a Community Strengthening Capacity Building Network(s) within our framework called **DyCE**. Collaborative problem-solving model in obtaining environmental justice (1) implementation of an innovative community-owned and managed (**COMR**) research model; (2) bringing stakeholders together with diverse and conflicting viewpoints.

1. 2BridgeCDX is bound to ethical and legal issues faced by community leaders and how they make decisions that affect their organizations and the citizens they "*serve*".
2. 2BridgeCDX it bound to the foundational practice of establishing an inclusive learning community with attention to developing leadership skills of self-reflection, deep listening, and facilitation.

Empowering Agencies to Engage Communities

Successful Stakeholder Involvement– Public Participation Activities –Require that agency staff receive training or expert assistance. It is imperative that agencies host a series of public dialogues designed to solicit input from local residents most likely to be directly impacted by policy decisions. Communities face many barriers that prevent them from engaging directly in government agency processes called special interest, agenda, nonprofits proxy organizations.

Agency staff involved in stakeholder and public participation efforts, including partnerships, need special training both in the value and use of these activities and how to conduct them properly. If training is not available, staff should obtain expert assistance. A variety of skills and techniques in addition to adequate background knowledge are a must if the initiative(s) are to be successful.

In a 1999 evaluation that looked at public participation in contaminated site cleanups, Community Advisory Board members involved in contamination remediation at the Sandia National Laboratory Site near Albuquerque remarked that public participation processes will not be perceived as credible unless agency staff are educated why such processes are important and how they should be implemented. Other areas in which staff involved in public participation and stakeholder involvement activities could benefit from training include: listening and two-way communication, partnering, process management, negotiation, consensus-building, vision-building, cross-cutting analysis, and multi-media approaches to environmental protection.

In addition, for staff lacking experience but currently involved in public we use demonstration projects to show the efficacy of public participation, and build the understanding of good participatory practice. Working in conjunction with a local community partner(s) organization and agency faculty member(s);

(1) identify and examine key issues facing a specific community, and

(2) (b) develop and deliver a research-based intellectual product that enhances the capacities of the served community and partner organization.

Proxy stakeholders just want to tick boxes and not necessarily listen to what communities have to say …many of them have their own agendas; they have only so much money they can spend and will give to things that they think will be of benefit…. So, there are two sides to influence. One is about communities becoming more influential and the other is about the public sector being more open to influence. It's not about communities doing more training – it's about service providers learning how to do it. Governmental agencies do need to demonstrate that empowerment and working with communities is worth it and that this makes a difference to achieving targets in health, and education.

Community empowerment at the heart of empowering agencies

Exploring how public agencies can assess and improve their openness and ability to respond to community influence in connection of people to power effectively.

1. Initiating bottom-up engagement processes that brings "affected" residents and decision-makers together to solve policy biggest challenges. (what is possible or not). How to make it happen.
2. Design, deliver and evaluate world-class proven community participatory processes and strategies that directly support public participation practices and research, particularly where it builds the case and pressure for wider change.

We want communities not only to have their bodies present to participate, but also that their minds or hearts are engaged with the subject matter. *Agencies should divide the different types of community engagement processes under broad headings, with specificity in conducting or participating in each public participation and across cultures.*

Why communities of color are getting frustrated with Collective Impact(CI)

After several years in community-based fence-line groups trying to work with various Collective Impact (CI) efforts, it's clear there are a lot of challenges, ranging from irritating to terrifying to right out destructive:

"Collective Impact" has been annoying for a lot of marginalized communities because it is yet another example of the mainstream community "discovering" something that has been around for a long time, slapping some academic labels, campaigns and marketing concepts on it, positioning it as new, and then getting all the attention and resources.

Long before CI came out as a formal concept, diverse communities were already working together, sharing information, creating coordinating mechanisms. They have been doing Collective Impact way before it was called that, and they will continue to. But like other things that have been Columbused—coconut water, for example—we're just not yet as good at marketing, or we don't have the trust and connections to elevate these ideas and get them funded; not making pejorative statements that communities of color *should get "some funds" as stated…* ones didn't get "some funds" when promoted to deputy director and it comes to most titled organizational positions.

The ally industrial complex builds organizational capacity and power, establishing themselves comfortably among the top ranks in their hierarchy of oppression as they strive to become the ally "champions" of the most oppressed. While the exploitation of solidarity and support is nothing new, the commodification and exploitation of allyship is a growing trend in the activism industry.

In order to commodify struggle it must first be objectified. This is exhibited in how "issues" are "framed" & "branded." Where struggle is commodity, allyship is currency. Ally has also become an identity, disembodied from any real mutual understanding of support. Identify points of intervention against the ally industrial complex when the term ally has been rendered ineffective and meaningless. These groups are proxies… a proclaimed agent not

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Building Resources Initiatives Developing Growing and Empowerment

Dimension of Community Empowerment
Community Inclusive • Community Influential • Community Organized

authorized to act on behalf and permission to speak for a community-based grass-roots communities whom are none the aware. While the engagement TCI processes has failed to put "affected" community residents in the room and at the table being directly involved with the decision making? As it is the same with the House Bill– Environmental Justice for All Act, and the Proposed Rule to Modernize NEPA Regulations.

Public involvement and a systematic interdisciplinary approach are
essential parts of the development process for proposed actions.

Measurable Outcomes in "all" communities

We strongly support the Transportation and Climate Initiative having an opportunity to reduce greenhouse gas emissions and re-invest funds to much needed transit improvements.

We are not providing comments here on investment strategies or priorities under the proposed TCI strategy, though we believe strongly in a thoughtful and targeted investments, determined participatory involvement proven processes, are critical to ensuring equitable policy that benefits communities the Mid-Atlantic Region throughout the states.

Public Participatory-Participation involvement and community engagement. Early and meaningful public participation in the agency decision-making process is a paramount goal. Advisory boards, leadership forums, commissions, etc., DO NOT WORK and are not of community in bottom up grass-roots community initiatives.

Eight Basic Steps to Successful Community Engagement and Mobilization

1. Ensure meaningful public participation and promote community capacity building to allow communities to be effective participants in environmental decision-making processes.
2. Meaningful public participation is critical to the success of any effort to address environmental justice issues
3. Develop a criterion that distinguish successful programs for meaningful public participation.
4. Start off with a transparent community selection process and share results
5. Map community priorities and identify community leaders through community assessments
6. Hold preliminary meetings with community leaders and enlist their support to mobilize community participation
7. Hold community agency assembly meetings to elect local representation to coordinate program activities
8. Allow communities to prioritize and select quick impact projects to solidify support and galvanize local participation

Agencies should ask why are we engaged with organizations at the table and not community leadership... it's a systematic system that keeps communities just where they are exploited.

Concluding Remarks

Public participation needs to be greatly expanded throughout all of the Mid-Atlantic TCI states with a proven method giving the opportunity for the public to participate in the Agency decisions. Public participatory involvement can be criticized on a number of fronts regarding its public participatory and stakeholder involvement in its efforts: not performing effective or sufficient outreach; not providing the public with adequate and timely information; not making it easier for persons with non-technical backgrounds to participate in technical decisions; not taking the advice it specifically asked stakeholders to provide; and only allowing communities to make their input known once industry and the Agency have already spent considerable time debating the most important decisions.

In light of these criticisms, Agencies need to make monumental strides to continually improve their systemic systems demonstrated by;

> *DNREC Secretary Shawn Garvin held a first step event hosting an 'environmental justice roundtable' in Route 9 corridor with beginning to improve lines of communication between the agency and underserved communities who are disproportionately impacted by environmental issues. Garvin states he looked to answer questions such as, (1) "Where are environmental justice communities? (2) Who are the leaders in those communities? And, (3) Whom should the agencies be communicating with?"*

However, we have found that agencies have a limited ability to measure improvements in how it involves and works with the stakeholders and the public to characterize the effectiveness of a particular Agency stakeholder involvement or public participation activity. Agencies lack an evaluative component, making it difficult to discern different efforts' strengths and weaknesses.

To be able to provide quality and flexible services that meet community needs agencies should be accountable to communities in terms of statutory delivery so that people can have some power and influence over their lives. It is important to have a common vision and a shared purpose.

To improve Agency initiatives in the future, it would be valuable to evaluate a greater number of agency initiatives to work with the public: for both traditional and non-traditional approaches. It's clear that agencies work hard to involve the public. What isn't always as clear is how effective the initiatives have been. Greater focus on developing standard evaluation criteria and performance measures that evaluators can draw from should greatly assist this effort. Agencies have a legal duty to engage. You are public servants' communities are tax payers.

We work to ensure that community development is recognized and supported as a powerful way of tackling inequality and achieving social justice. 2BridgeCDX reflects a diverse range of interests in community development across all sectors and fields, and has members from across the Mid-Atlantic region.
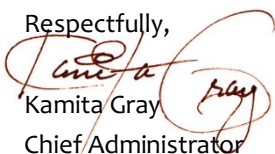
This is about playing a key role in bringing people together in groups – either to work on issues identified by themselves or to look at issues raised by public agencies. At this stage, agencies are aware of how to reach different groups and of 'empowering' ways of working.

Working together creates positive alliances with communities, other departments and agencies, and develop intelligence-led approaches which build on existing work.

Thank you for your continued leadership in the Transportation and Climate Initiative (TCI) toward the development of a robust and equitable regional clean transportation policy. In support of these efforts, our membership, we, respectfully submit the following comments in response to the "Draft Memorandum of Understanding of the Transportation and Climate Initiative" (Draft MOU) and "2019 Cap-and-Invest Modeling Results", released on December 17, 2019.

We look forward to working with you to further cultivate meaningful participatory participation engagement and two-way involvement sections of this Model Rule to ensure the program achieves equitable outcomes.

Respectfully,

Kamita Gray
Chief Administrator

cc: Executive Community Citizen's Board (ECCB)
    Community CeDap Membership Representatives Administrative Chairs