

THE BRIEFING PROJECT EPISODE 17 – The Myth of Engagement – January 22, 2019

Thank you, Commissioners. My name is Steve Edmiston, I live Des Moines, I'm here for The Briefing Project. Today a bit of tough love. We'll discuss the myth of engagement, and particularly, the myth that the Port engages meaningfully with the airport neighbor communities on the impacts to health and the environment from overflight noise and emissions.

True engagement is not just the right thing to do, but is legally required. That is the core lesson from the *City of Phoenix* case. Where the engagement is a myth – because it just checks a box, or is a marketing campaign, or is simply inadequate – then the action based on the engagement is arbitrary and capricious. To get a sense for how close to the sun you are flying, the *Phoenix* Court characterized the FAA's contention that a 300% increase in flight frequency would not be "highly controversial" as "implausible." Which is spine-tingler, because your regular consultant Steve Alverson stated last year that the flights over our 3rd Runway communities have recently increased by – and you can't make this stuff up – by 300%.

Now, hoping we agree that just like Maverick at the end of Top Gun, you must engage, let's be candid about the myth of engagement so we can fix it.

First, the myth is perpetuated when the Port refuses to provide the type of engagement the communities need. One example. This summer, the Port flat refused a direct request from Des Moines for a town hall engagement. Worse, under the format forced on the city, dozens of Port staff stood for hours in front of blank story boards and refused to answer questions from citizens. I had my camera crew there. It's on film. It was surreal.

Second, the myth of engagement was given oxygen by deleting the words "quality of life" from the Port's bylaws and mission statement. This jaw-dropper from last year allows the Port to engage in selective environmentalism, on issues that don't place airport growth at risk, such as biofuels, recycling, and shellfish, kelp, and eelgrass. Removing a duty to protect quality of life also allows you to ignore science like the World Health Organization's 2018 Environmental Noise Guidelines. The Port has made no comment on this blockbuster report in three months.

Third, the myth of engagement is perpetuated at stakeholder groups, like START, Highline Forum, and the SCATBd, that appear predicated upon Port control of the agenda and assuring the Port can distance itself from unwanted change. Example? Last week the Port refused to join 15 other SCATBd cities in a new legislative agenda calling for the simple creation of regional airport siting committee.

The Port's approach presents a textbook application of the seminal 1969 "Arnstein Ladder" of community engagement. On the bottom rungs, labeled manipulation and therapy, the powerless stakeholders are falsely engaged by placement on "rubberstamp advisory committees or advisory boards" to educate them, or engineer their support, or change their views, instead of addressing the problem and providing top-rung shared decision-making. Sounding super-duper familiar? Maverick, engage.


Thank you for giving a citizen two-minutes to comment. I have copies of my own article on the Phoenix case, and the Arnstein Ladder, for each of you.



THE BRIEFING

**THE BRIEFING YOU ASKED FOR BUT DID NOT RECEIVE –
IN TWO MINUTE PUBLIC COMMENTS**

PORT OF SEATTLE COMMISSION MEETING
JANUARY 22, 2019
STEVE EDMISTON



Episode 17 – The Myth of Engagement

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7. Stuck on the bottom of the engagement ladder.

CITY OF PHOENIX PLAYS “ROGUE ONE” TO FAA’S DEATH STAR

 medium.com/@stevedmistonQ45/city-of-phoenix-plays-rogue-one-to-faas-death-star-a15b71ae3b05

Steve Edmiston

August 31, 2017

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The Federal Aviation Administration’s relentless nationwide rollout of satellite-navigation-based airport expansions was dealt a significant setback in *City of Phoenix v. Huerta and Federal Aviation Administration*, No. 15–1158 (D.C. Cir., August 29, 2017).



The Court of Appeals sent the FAA a powerful message—that the FAA’s playbook for implementing satellite-based route changes and frequency increases (sometimes known as “NextGen”) in Phoenix failed to adequately identify the potential harm to humans, the environment, and historic neighborhoods, homes, parks, and sites, and it failed to give sufficient notice of the impacts to, and provide for sufficient involvement of, city officials and community groups. The FAA’s actions—changing flight routes and increasing flight frequencies at the Phoenix Sky Harbor International Airport—were deemed “arbitrary and

capricious” under three different federal statutes—the National Historic Preservation Act; the National Environmental Policy Act (NEPA); and the Department of Transportation Act. The Court even admonished the FAA for tactics that appeared designed to seduce the City to delay filing suit, in order to claim the City waited too long to file suit.

The case provides a useful roadmap for other airport neighbor cities, with a virtual step-by-step guide for reviewing the FAA’s actions to determine whether the FAA failed to provide adequate notice and information to the proper individuals and groups, failed to collect needed information, and otherwise failed to comply with three federal statutes, before rolling out its satellite-based navigation procedures.

Along the way, the Court provides some truly remarkable holdings.

First, the National Historic Preservation Act (NHPA) suddenly becomes a critical component for community pushback against the FAA. The Court found the FAA failed to determine that no historic structures were adversely affected and failed to notify required parties and provide relevant documentation. The FAA’s notice was deemed inadequate because the FAA was required to confirm, and did not confirm, that the individuals notified were the correct individuals for assuring compliance with the NHPA. Critically, for airport communities suffering from NextGen in other cities, the FAA failed because it did not provide the public with information about *how action effects historic properties and seek public comment and input*.

Additionally, unless confidential information is involved, agencies must “provide the public with information about an undertaking and its effects on historic properties *and seek public comment and input.*” *Id.* § 800.2(d)(2) (emphasis added). The FAA admits, however, that it did not make “local citizens and community leaders” aware of the proposed new routes and procedures, J.A. 364, and it does not claim that any confidentiality concerns applied.

Further, by keeping the public in the dark, the agency made it impossible for the public to submit views on the project’s potential effects—views that the FAA is required to consider. *See* 36 C.F.R. § 800.5(a); *see also Am. Bird Conservancy v. FCC*, 516 F.3d 1027, 1035 (D.C. Cir. 2008) (“Interested persons cannot request an [environmental assessment] for actions they do not know about, much less for actions already completed.”).

The more you (don’t) know.

Second, under the National Environmental Policy Act (NEPA), the FAA wrongfully avoided a more detailed environmental impact statement by erroneously applying a “categorical

exclusion” to the route changes. The Court again provided the roadmap, holding no categorical exclusion can apply if there are “extraordinary circumstances,” which exist when the action is “likely to be highly controversial on environmental grounds.” Perhaps the most excoriating quote in the case is this: “Common sense reveals otherwise. As noted, the FAA’s proposal would increase by 300% the number of aircraft flying over twenty-five historic neighborhoods and buildings and nineteen public parks, with 85% of the new flight traffic coming from new jets. The idea that a change with these effects would not be highly controversial is ‘so implausible’ that it could not reflect reasoned decision-making.”

concerns.” FAA Br. 80. Common sense reveals otherwise. As noted, the FAA’s proposal would increase by 300% the number of aircraft flying over twenty-five historic neighborhoods and buildings and nineteen public parks, with 85% of the new flight traffic coming from jets. The idea that a change with these effects would not be highly controversial is “so implausible” that it could not reflect reasoned decisionmaking. *See Motor Vehicle Mfrs. Ass’n of U.S. v. State Farm Mut. Auto. Ins. Co.*, 463 U.S. 29, 43 (1983).

Common sense? What a concept.

The FAA was also called to task *for failing to take into account its prior experiences in similar circumstances at other airports*. In other words, the FAA’s divide-and-conquer strategy, claiming each airport is different, was rejected. The FAA should have provided a “reasoned explanation for... treating similar situations differently.”

The FAA also erred by deviating from its usual practice in assessing when new flight routes are likely to be highly controversial, without giving a “reasoned explanation for . . . treating similar situations differently.” *W. Deptford Energy, LLC v. FERC*, 766 F.3d 10, 20 (D.C. Cir. 2014). In assessing proposed route changes at airports in Boston, Northern California, Charlotte, and Atlanta, the FAA has relied on its general observation that a proposal is likely to be highly controversial if it would increase sound levels by five or more decibels in an area already experiencing average levels of 45-60 decibels. But here the agency said exactly the opposite and

If it looks like a duck...

The practical implication? The FAA is being held to account for the Nixon question – what did it know and when did it know it – in relation to how bad the FAA NextGen satellite-based navigation rollouts have been in all prior cities. And because they have all been bad, and because the FAA did not explain why the prior problems were not likely to be problems at Phoenix, the FAA's failure to conduct a full EIS was arbitrary and capricious.

Third, the Transportation Act holdings may provide the most unique and powerful roadmaps of all. The Court found the FAA failed to consult with the City "in assessing whether new routes would substantially impair the City's parks and historic sites," and "FAA was wrong to find the routes would not substantially impair these protected areas." The key rationale that will cause the FAA severe heartburn is this: *"the FAA cites no evidence that it consulted with these city officials on historic sites and public parks in particular."*

consultation duties required. Besides, the FAA cites no evidence that it consulted with these City officials on historic sites and public parks in particular. Thus, the FAA's consultation process was arbitrarily confined.

It's not just who you consulted with – it's whether you consulted with the right people.

In other words, the FAA can't go through the motions in a consultation, because the devil is in the details *and* in the content of the consultation.

Also under the Transportation Act, if the use of a park is so negatively impacted by overflights that it amounts to a taking, the FAA action can only proceed if there is no prudent and feasible alternative to using the park. Here, the problems for the FAA suddenly magnify exponentially. Reliance on the FAA's go-to hole card – compliance with the NEPA Part 150 Noise Study – may not be sufficient to determine noise impact if *"a quiet setting is a generally recognized purpose and attribute"* of historic residences, neighborhoods, and sites. The Court agreed that a Part 150 alone does not provide adequate information on this required topic. Critically, this was true even where the sites were urban: *"even in the heart of a city some neighborhoods might be recognized as quiet oases."*

Finally, the Court used the Transportation Act to hit the nail on the head for other impacted airport communities across the country. In addressing the FAA's argument that overflights had already historically occurred in these communities, the Court shut the door with common sense: *"But those earlier flights involved propeller aircraft that flew far less often so the homes beneath them might still have been generally recognized as "quiet settings."* In other words – historical uses are not the same as present uses and the FAA can't try to avoid its obligations by claiming it has already made some noise.

Thus, it was unreasonable for the agency to rely only on the Part 150 guidelines in concluding that noise from the new flight routes would not substantially impair the affected historic sites. As a result, that conclusion lacks substantial supporting evidence. For both these reasons, we find that the agency's substantial-impairment analysis was arbitrary and capricious.

One Part 150 does not fit all.

It must be noted that this case comes with a dire warning to all—that timing matters. The rule is that a petition must be filed within 60 days after FAA “final action” issues. The problem in Phoenix? The routes had been in effect for six months. They were too late. But the Court provided a yet another “save” because it found the FAA repeatedly communicated it was continuing to look into the noise problem, was open to fixing the issue, wanted to work with the City and others to find a solution. This led to the conclusion that “reasonable observers to think the FAA might fix the noise problem without being forced to do so by a court.” In other words, the FAA led the community groups and city down a path of cooperation. The Court clearly did not like this tactic. *“While we rarely find a reasonable-grounds exception, this is such a rare case.”* The Court finished with a truly remarkable identification of nefarious intent: *“To conclude otherwise would encourage the FAA to promise to fix the problem just long enough for sixty days to lapse and then to argue that the resulting petitions were untimely.”*

This case will require some ongoing thought and consideration—and certainly, the FAA may well appeal. At first blush, on the outside looking in, it's a winner for long-suffering airport neighbor communities. Perhaps for now, like the impossible-odds-facing Rogue One crew and Rebel Alliance that follows, the Force is now with us—for at least a brief period of time.

A LADDER OF CITIZEN PARTICIPATION

Sherry R. Arnstein

The heated controversy over "citizen participation," "citizen control," and "maximum feasible involvement of the poor," has been waged largely in terms of exacerbated rhetoric and misleading euphemisms. To encourage a more enlightened dialogue, a typology of citizen participation is offered using examples from three federal social programs: urban renewal, anti-poverty, and Model Cities. The typology, which is designed to be provocative, is arranged in a ladder pattern with each rung corresponding to the extent of citizens' power in determining the plan and/or program.

The idea of citizen participation is a little like eating spinach: no one is against it in principle because it is good for you. Participation of the governed in their government is, in theory, the cornerstone of democracy—a revered idea that is vigorously applauded by virtually everyone. The applause is reduced to polite handclaps, however, when this principle is advocated by the have-not blacks, Mexican-Americans, Puerto Ricans, Indians, Eskimos, and whites. And when the have-nots define participation as redistribution of power, the American consensus on the fundamental principle explodes into many shades of outright racial, ethnic, ideological, and political opposition.

There have been many recent speeches, articles, and books¹ which explore in detail *who* are the have-nots of our time. There has been much recent documentation of *why* the have-nots have become so offended and embittered by their powerlessness to deal with the profound inequities and injustices pervading their daily lives. But there has been very little analysis of the content of the current controversial slogan: "citizen participation" or "maximum feasible participation." In short: *What* is citizen participation and what is its relationship to the social imperatives of our time?

Citizen Participation is Citizen Power

Because the question has been a bone of political contention, most of the answers have been purposely buried in innocuous euphemisms like "self-help" or "citizen involvement." Still others have been embellished with misleading rhetoric like "absolute control" which is something no one—including the President of the

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United States—has or can have. Between understated euphemisms and exacerbated rhetoric, even scholars have found it difficult to follow the controversy. To the headline reading public, it is simply bewildering.

My answer to the critical *what* question is simply that citizen participation is a categorical term for citizen power. It is the redistribution of power that enables the have-not citizens, presently excluded from the political and economic processes, to be deliberately included in the future. It is the strategy by which the have-nots join in determining how information is shared, goals and policies are set, tax resources are allocated, programs are operated, and benefits like contracts and patronage are parceled out. In short, it is the means by which they can induce significant social reform which enables them to share in the benefits of the affluent society.

EMPTY RITUAL VERSUS BENEFIT

There is a critical difference between going through the empty ritual of participation and having the real power needed to affect the outcome of the process. This difference is brilliantly capsulized in a poster painted last spring by the French students to explain the student-worker rebellion.² (See Figure 1.) The poster highlights the fundamental point that participation without redistribution of power is an empty and frustrating process for the powerless. It allows the power-holders to claim that all sides were considered, but makes it possible for only some of those sides to benefit. It maintains the status quo. Essentially, it is what has



FIGURE 1 French Student Poster. In English, I participate; you participate; he participates; we participate; you participate . . . They profit.

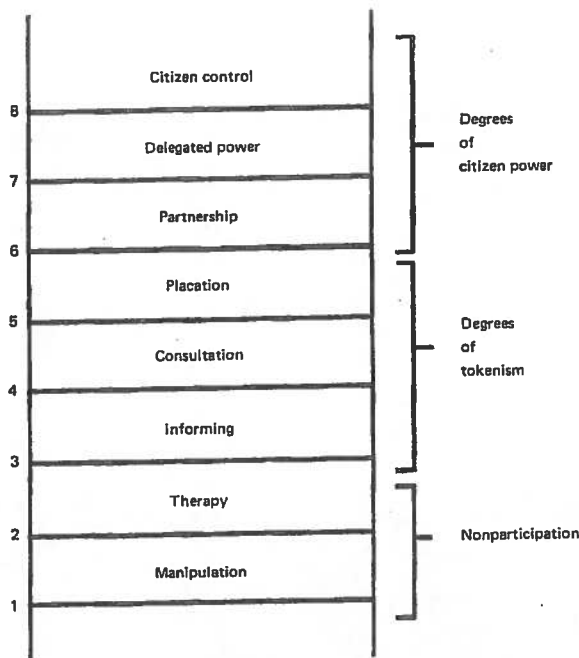


FIGURE 2 *Eight Rungs on a Ladder of Citizen Participation*

been happening in most of the 1,000 Community Action Programs, and what promises to be repeated in the vast majority of the 150 Model Cities programs.

Types of Participation and "NonParticipation"

A typology of eight *levels* of participation may help in analysis of this confused issue. For illustrative purposes the eight types are arranged in a ladder pattern with each rung corresponding to the extent of citizens' power in determining the end product.³ (See Figure 2.)

The bottom rungs of the ladder are (1) *Manipulation* and (2) *Therapy*. These two rungs describe levels of "non-participation" that have been contrived by some to substitute for genuine participation. Their real objective is not to enable people to participate in planning or conducting programs, but to enable powerholders to "educate" or "cure" the participants. Rungs 3 and 4 progress to levels of "tokenism" that allow the have-nots to hear and to have a voice: (3) *Informing* and (4) *Consultation*. When they are proffered by powerholders as the total extent of participation, citizens may indeed hear and be heard. But under these conditions they lack the power to insure that their views will be *heeded* by the powerful. When participation is restricted to these levels, there is no followthrough, no "muscle," hence no assurance of changing the status quo. Rung (5) *Placation*, is simply a higher level tokenism because the groundrules allow have-nots to advise, but retain for the powerholders the continued right to decide.

Further up the ladder are levels of citizen power with increasing degrees of decision-making clout. Citizens

can enter into a (6) *Partnership* that enables them to negotiate and engage in trade-offs with traditional powerholders. At the topmost rungs, (7) *Delegated Power* and (8) *Citizen Control*, have-not citizens obtain the majority of decision-making seats, or full managerial power.

Obviously, the eight-rung ladder is a simplification, but it helps to illustrate the point that so many have missed—that there are significant gradations of citizen participation. Knowing these gradations makes it possible to cut through the hyperbole to understand the increasingly strident demands for participation from the have-nots as well as the gamut of confusing responses from the powerholders.

Though the typology uses examples from federal programs such as urban renewal, anti-poverty, and Model Cities; it could just as easily be illustrated in the church, currently facing demands for power from priests and laymen who seek to change its mission; colleges and universities which in some cases have become literal battlegrounds over the issue of student power; or public schools, city halls, and police departments (or big business which is likely to be next on the expanding list of targets). The underlying issues are essentially the same—"nobodies" in several arenas are trying to become "somebodies" with enough power to make the target institutions responsive to their views, aspirations, and needs.

LIMITATIONS OF THE TYPOLOGY

The ladder juxtaposes powerless citizens with the powerful in order to highlight the fundamental divisions between them. In actuality, neither the have-nots nor the powerholders are homogeneous blocs. Each group encompasses a host of divergent points of view, significant cleavages, competing vested interests, and splintered subgroups. The justification for using such simplistic abstractions is that in most cases the have-nots really do perceive the powerful as a monolithic "system," and powerholders actually do view the have-nots as a sea of "those people," with little comprehension of the class and caste differences among them.

It should be noted that the typology does not include an analysis of the most significant roadblocks to achieving genuine levels of participation. These roadblocks lie on both sides of the simplistic fence. On the powerholders' side, they include racism, paternalism, and resistance to power redistribution. On the have-nots' side, they include inadequacies of the poor community's political socioeconomic infrastructure and knowledge-base, plus difficulties of organizing a representative and accountable citizens' group in the face of futility, alienation, and distrust.

Another caution about the eight separate rungs on the ladder: In the real world of people and programs, there might be 150 rungs with less sharp and "pure" distinctions among them. Furthermore, some of the characteristics used to illustrate each of the eight types might be

applicable to other rungs. For example, employment of the have-nots in a program or on a planning staff could occur at any of the eight rungs and could represent either a legitimate or illegitimate characteristic of citizen participation. Depending on their motives, powerholders can hire poor people to coopt them, to placate them, or to utilize the have-nots' special skills and insights.⁴ Some mayors, in private, actually boast of their strategy in hiring militant black leaders to muzzle them while destroying their credibility in the black community.

Characteristics and Illustrations

It is in this context of power and powerlessness that the characteristics of the eight rungs are illustrated by examples from current federal social programs.

1. MANIPULATION

In the name of citizen participation, people are placed on rubberstamp advisory committees or advisory boards for the express purpose of "educating" them or engineering their support. Instead of genuine citizen participation, the bottom rung of the ladder signifies the distortion of participation into a public relations vehicle by powerholders.

This illusory form of "participation" initially came into vogue with urban renewal when the socially elite were invited by city housing officials to serve on Citizen Advisory Committees (CACs). Another target of manipulation were the CAC subcommittees on minority groups, which in theory were to protect the rights of Negroes in the renewal program. In practice, these subcommittees, like their parent CACs, functioned mostly as letterheads, trotted forward at appropriate times to promote urban renewal plans (in recent years known as Negro removal plans).

At meetings of the Citizen Advisory Committees, it was the officials who educated, persuaded, and advised the citizens, not the reverse. Federal guidelines for the renewal programs legitimized the manipulative agenda by emphasizing the terms "information-gathering," "public relations," and "support" as the explicit functions of the committees.⁵

This style of nonparticipation has since been applied to other programs encompassing the poor. Examples of this are seen in Community Action Agencies (CAAs) which have created structures called "neighborhood councils" or "neighborhood advisory groups." These bodies frequently have no legitimate function or power.⁶ The CAAs use them to "prove" that "grassroots people" are involved in the program. But the program may not have been discussed with "the people." Or it may have been described at a meeting in the most general terms; "We need your signatures on this proposal for a multiservice center which will house, under one roof, doctors from the health department, workers from the welfare department, and specialists from the employment service."

The signators are not informed that the \$2 million-per-year center will only refer residents to the same old waiting lines at the same old agencies across town. No one is asked if such a referral center is really needed in his neighborhood. No one realizes that the contractor for the building is the mayor's brother-in-law, or that the new director of the center will be the same old community organization specialist from the urban renewal agency.

After signing their names, the proud grassroots dutifully spread the word that they have "participated" in bringing a new and wonderful center to the neighborhood to provide people with drastically needed jobs and health and welfare services. Only after the ribbon-cutting ceremony do the members of the neighborhood council realize that they didn't ask the important questions, and that they had no technical advisors of their own to help them grasp the fine legal print. The new center, which is open 9 to 5 on weekdays only, actually adds to their problems. Now the old agencies across town won't talk with them unless they have a pink paper slip to prove that they have been referred by "their" shiny new neighborhood center.

Unfortunately, this chicanery is not a unique example. Instead it is almost typical of what has been perpetrated in the name of high-sounding rhetoric like "grassroots participation." This sham lies at the heart of the deep-seated exasperation and hostility of the have-nots toward the powerholders.

One hopeful note is that, having been so grossly affronted, some citizens have learned the Mickey Mouse game, and now they too know how to play. As a result of this knowledge, they are demanding genuine levels of participation to assure them that public programs are relevant to their needs and responsive to their priorities.

2. THERAPY

In some respects group therapy, masked as citizen participation, should be on the lowest rung of the ladder because it is both dishonest and arrogant. Its administrators—mental health experts from social workers to psychiatrists—assume that powerlessness is synonymous with mental illness. On this assumption, under a masquerade of involving citizens in planning, the experts subject the citizens to clinical group therapy. What makes this form of "participation" so invidious is that citizens are engaged in extensive activity, but the focus of it is on curing them of their "pathology" rather than changing the racism and victimization that create their "pathologies."

Consider an incident that occurred in Pennsylvania less than one year ago. When a father took his seriously ill baby to the emergency clinic of a local hospital, a young resident physician on duty instructed him to take the baby home and feed it sugar water. The baby died that afternoon of pneumonia and dehydration. The overwrought father complained to the board of the local

Community Action Agency. Instead of launching an investigation of the hospital to determine what changes would prevent similar deaths or other forms of malpractice, the board invited the father to attend the CAA's (therapy) child-care sessions for parents, and promised him that someone would "telephone the hospital director to see that it never happens again."

Less dramatic, but more common examples of therapy, masquerading as citizen participation, may be seen in public housing programs where tenant groups are used as vehicles for promoting control-your-child or cleanup campaigns. The tenants are brought together to help them "adjust their values and attitudes to those of the larger society." Under these groundrules, they are diverted from dealing with such important matters as: arbitrary evictions; segregation of the housing project; or why is there a three-month time lapse to get a broken window replaced in winter.

The complexity of the concept of mental illness in our time can be seen in the experiences of student/civil rights workers facing guns, whips, and other forms of terror in the South. They needed the help of socially attuned psychiatrists to deal with their fears and to avoid paranoia.⁷

3. INFORMING

Informing citizens of their rights, responsibilities, and options can be the most important first step toward legitimate citizen participation. However, too frequently the emphasis is placed on a one-way flow of information—from officials to citizens—with no channel provided for feedback and no power for negotiation. Under these conditions, particularly when information is provided at a late stage in planning, people have little opportunity to influence the program designed "for their benefit." The most frequent tools used for such one-way communication are the news media, pamphlets, posters, and responses to inquiries.

Meetings can also be turned into vehicles for one-way communication by the simple device of providing superficial information, discouraging questions, or giving irrelevant answers. At a recent Model Cities citizen planning meeting in Providence, Rhode Island, the topic was "tot-lots." A group of elected citizen representatives, almost all of whom were attending three to five meetings a week, devoted an hour to a discussion of the placement of six tot-lots. The neighborhood is half black, half white. Several of the black representatives noted that four tot-lots were proposed for the white district and only two for the black. The city official responded with a lengthy, highly technical explanation about costs per square foot and available property. It was clear that most of the residents did not understand his explanation. And it was clear to observers from the Office of Economic Opportunity that other options did exist which, considering available funds, would have brought about a more equitable distribution of facilities. Intimidated by futility, legalistic jargon, and prestige of

the official, the citizens accepted the "information" and endorsed the agency's proposal to place four lots in the white neighborhood.⁸

4. CONSULTATION

Inviting citizens' opinions, like informing them, can be a legitimate step toward their full participation. But if consulting them is not combined with other modes of participation, this rung of the ladder is still a sham since it offers no assurance that citizen concerns and ideas will be taken into account. The most frequent methods used for consulting people are attitude surveys, neighborhood meetings, and public hearings.

When powerholders restrict the input of citizens' ideas solely to this level, participation remains just a window-dressing ritual. People are primarily perceived as statistical abstractions, and participation is measured by how many come to meetings, take brochures home, or answer a questionnaire. What citizens achieve in all this activity is that they have "participated in participation." And what powerholders achieve is the evidence that they have gone through the required motions of involving "those people."

Attitude surveys have become a particular bone of contention in ghetto neighborhoods. Residents are increasingly unhappy about the number of times per week they are surveyed about their problems and hopes. As one woman put it: "Nothing ever happens with those damned questions, except the surveyer gets \$3 an hour, and my washing doesn't get done that day." In some communities, residents are so annoyed that they are demanding a fee for research interviews.

Attitude surveys are not very valid indicators of community opinion when used without other input from citizens. Survey after survey (paid for out of anti-poverty funds) has "documented" that poor housewives most want tot-lots in their neighborhood where young children can play safely. But most of the women answered these questionnaires without knowing what their options were. They assumed that if they asked for something small, they might just get something useful in the neighborhood. Had the mothers known that a free prepaid health insurance plan was a possible option, they might not have put tot-lots so high on their wish lists.

A classic misuse of the consultation rung occurred at a New Haven, Connecticut, community meeting held to consult citizens on a proposed Model Cities grant. James V. Cunningham, in an unpublished report to the Ford Foundation, described the crowd as large and "mostly hostile:"⁹

Members of The Hill Parents Association demanded to know why residents had not participated in drawing up the proposal. CAA director Spitz explained that it was merely a proposal for seeking Federal planning funds—that once funds were obtained, residents would be deeply involved in the planning. An outside observer who sat in

the audience described the meeting this way:

"Spitz and Mel Adams ran the meeting on their own. No representatives of a Hill group moderated or even sat on the stage. Spitz told the 300 residents that this huge meeting was an example of 'participation in planning.' To prove this, since there was a lot of dissatisfaction in the audience, he called for a 'vote' on each component of the proposal. The vote took this form: 'Can I see the hands of all those in favor of a health clinic? All those opposed?' It was a little like asking who favors motherhood."

It was a combination of the deep suspicion aroused at this meeting and a long history of similar forms of "window-dressing participation" that led New Haven residents to demand control of the program.

By way of contrast, it is useful to look at Denver where technicians learned that even the best intentioned among them are often unfamiliar with, and even insensitive to, the problems and aspirations of the poor. The technical director of the Model Cities program has described the way professional planners assumed that the residents, victimized by high-priced local storekeepers, "badly needed consumer education."¹⁰ The residents, on the other hand, pointed out that the local storekeepers performed a valuable function. Although they overcharged, they also gave credit, offered advice, and frequently were the only neighborhood place to cash welfare or salary checks. As a result of this consultation, technicians and residents agreed to substitute the creation of needed credit institutions in the neighborhood for a consumer education program.

5. PLACATION

It is at this level that citizens begin to have some degree of influence though tokenism is still apparent. An example of placation strategy is to place a few hand-picked "worthy" poor on boards of Community Action Agencies or on public bodies like the board of education, police commission, or housing authority. If they are not accountable to a constituency in the community and if the traditional power elite hold the majority of seats, the have-nots can be easily outvoted and outfoxed. Another example is the Model Cities advisory and planning committees. They allow citizens to advise or plan ad infinitum but retain for powerholders the right to judge the legitimacy or feasibility of the advice. The degree to which citizens are actually placated, of course, depends largely on two factors: the quality of technical assistance they have in articulating their priorities; and the extent to which the community has been organized to press for those priorities.

It is not surprising that the level of citizen participation in the vast majority of Model Cities programs is at the placation rung of the ladder or below. Policy-makers at the Department of Housing and Urban Development (HUD) were determined to return the genie of citizen power to the bottle from which it had escaped

(in a few cities) as a result of the provision stipulating "maximum feasible participation" in poverty programs. Therefore, HUD channeled its physical-social-economic rejuvenation approach for blighted neighborhoods through city hall. It drafted legislation requiring that all Model Cities' money flow to a local City Demonstration Agency (CDA) through the elected city council. As enacted by Congress, this gave local city councils final veto power over planning and programming and ruled out any direct funding relationship between community groups and HUD.

HUD required the CDAs to create coalition, policy-making boards that would include necessary local powerholders to create a comprehensive physical-social plan during the first year. The plan was to be carried out in a subsequent five-year action phase. HUD, unlike OEO, did not require that have-not citizens be included on the CDA decision-making boards. HUD's Performance Standards for Citizen Participation only demanded that "citizens have clear and direct access to the decision-making process."

Accordingly, the CDAs structured their policy-making boards to include some combination of elected officials; school representatives; housing, health, and welfare officials; employment and police department representatives; and various civic, labor, and business leaders. Some CDAs included citizens from the neighborhood. Many mayors correctly interpreted the HUD provision for "access to the decision-making process" as the escape hatch they sought to relegate citizens to the traditional advisory role.

Most CDAs created residents' advisory committees. An alarmingly significant number created citizens' policy boards and citizens' policy committees which are totally misnamed as they have either no policy-making function or only a very limited authority. Almost every CDA created about a dozen planning committees or task forces on functional lines: health, welfare, education, housing, and unemployment. In most cases, have-not citizens were invited to serve on these committees along with technicians from relevant public agencies. Some CDAs, on the other hand, structured planning committees of technicians and parallel committees of citizens.

In most Model Cities programs, endless time has been spent fashioning complicated board, committee, and task force structures for the planning year. But the rights and responsibilities of the various elements of those structures are not defined and are ambiguous. Such ambiguity is likely to cause considerable conflict at the end of the one-year planning process. For at this point, citizens may realize that they have once again extensively "participated" but have not profited beyond the extent the powerholders decide to placate them.

Results of a staff study (conducted in the summer of 1968 before the second round of seventy-five planning grants were awarded) were released in a December 1968 HUD bulletin.¹¹ Though this public document uses much more delicate and diplomatic language, it

attests to the already cited criticisms of non-policy-making policy boards and ambiguous complicated structures, in addition to the following findings:

1. Most CDAs did not negotiate citizen participation requirements with residents.

2. Citizens, drawing on past negative experiences with local powerholders, were extremely suspicious of this new panacea program. They were legitimately distrustful of city hall's motives.

3. Most CDAs were not working with citizens' groups that were genuinely representative of model neighborhoods and accountable to neighborhood constituencies. As in so many of the poverty programs, those who were involved were more representative of the upwardly mobile working-class. Thus their acquiescence to plans prepared by city agencies was not likely to reflect the views of the unemployed, the young, the more militant residents, and the hard-core poor.

4. Residents who were participating in as many as three to five meetings per week were unaware of their minimum rights, responsibilities, and the options available to them under the program. For example, they did not realize that they were not required to accept technical help from city technicians they distrusted.

5. Most of the technical assistance provided by CDAs and city agencies was of third-rate quality, paternalistic, and condescending. Agency technicians did not suggest innovative options. They reacted bureaucratically when the residents pressed for innovative approaches. The vested interests of the old-line city agencies were a major—albeit hidden—agenda.

6. Most CDAs were not engaged in planning that was comprehensive enough to expose and deal with the roots of urban decay. They engaged in "meetingitis" and were supporting strategies that resulted in "projectitis," the outcome of which was a "laundry list" of traditional programs to be conducted by traditional agencies in the traditional manner under which slums emerged in the first place.

7. Residents were not getting enough information from CDAs to enable them to review CDA developed plans or to initiate plans of their own as required by HUD. At best, they were getting superficial information. At worst, they were not even getting copies of official HUD materials.

8. Most residents were unaware of their rights to be reimbursed for expenses incurred because of participation—babysitting, transportation costs, and so on.

9. The training of residents, which would enable them to understand the labyrinth of the federal-state-city systems and networks of subsystems, was an item that most CDAs did not even consider.

These findings led to a new public interpretation of HUD's approach to citizen participation. Though the requirements for the seventy-five "second-round" Model City grantees were not changed, HUD's twenty-seven page technical bulletin on citizen participation repeatedly advocated that cities share power with residents.

It also urged CDAs to experiment with subcontracts under which the residents' groups could hire their own trusted technicians.

A more recent evaluation was circulated in February 1969 by OSTI, a private firm that entered into a contract with OEO to provide technical assistance and training to citizens involved in Model Cities programs in the northeast region of the country. OSTI's report to OEO corroborates the earlier study. In addition it states:¹⁸

In practically no Model Cities structure does citizen participation mean truly shared decision-making, such that citizens might view themselves as "the partners in this program. . . ."

In general, citizens are finding it impossible to have a significant impact on the comprehensive planning which is going on. In most cases the staff planners of the CDA and the planners of existing agencies are carrying out the actual planning with citizens having a peripheral role of watchdog and, ultimately, the "rubber stamp" of the plan generated. In cases where citizens have the direct responsibility for generating program plans, the time period allowed and the independent technical resources being made available to them are not adequate to allow them to do anything more than generate very traditional approaches to the problems they are attempting to solve.

In general, little or no thought has been given to the means of insuring continued citizen participation during the stage of implementation. In most cases, traditional agencies are envisaged as the implementors of Model Cities programs and few mechanisms have been developed for encouraging organizational change or change in the method of program delivery within these agencies or for insuring that citizens will have some influence over these agencies as they implement Model Cities programs. . . .

By and large, people are once again being planned *for*. In most situations the major planning decisions are being made by CDA staff and approved in a formalistic way by policy boards.

6. PARTNERSHIP

At this rung of the ladder, power is in fact redistributed through negotiation between citizens and powerholders. They agree to share planning and decision-making responsibilities through such structures as joint policy boards, planning committees and mechanisms for resolving impasses. After the groundrules have been established through some form of give-and-take, they are not subject to unilateral change.

Partnership can work most effectively when there is an organized power-base in the community to which the citizen leaders are accountable; when the citizens group has the financial resources to pay its leaders reasonable honoraria for their time-consuming efforts; and when the group has the resources to hire (and fire) its own technicians, lawyers, and community organizers. With these ingredients, citizens have some genuine bargain-

ing influence over the outcome of the plan (as long as both parties find it useful to maintain the partnership). One community leader described it "like coming to city hall with hat on head instead of in hand."

In the Model Cities program only about fifteen of the so-called first generation of seventy-five cities have reached some significant degree of power-sharing with residents. In all but one of those cities, it was angry citizen demands, rather than city initiative, that led to the negotiated sharing of power.¹³ The negotiations were triggered by citizens who had been enraged by previous forms of alleged participation. They were both angry and sophisticated enough to refuse to be "conned" again. They threatened to oppose the awarding of a planning grant to the city. They sent delegations to HUD in Washington. They used abrasive language. Negotiation took place under a cloud of suspicion and rancor.

In most cases where power has come to be shared it was *taken by the citizens*, not given by the city. There is nothing new about that process. Since those who have power normally want to hang onto it, historically it has had to be wrested by the powerless rather than proffered by the powerful.

Such a working partnership was negotiated by the residents in the Philadelphia model neighborhood. Like most applicants for a Model Cities grant, Philadelphia wrote its more than 400 page application and waved it at a hastily called meeting of community leaders. When those present were asked for an endorsement, they angrily protested the city's failure to consult them on preparation of the extensive application. A community spokesman threatened to mobilize a neighborhood protest *against* the application unless the city agreed to give the citizens a couple of weeks to review the application and recommend changes. The officials agreed.

At their next meeting, citizens handed the city officials a substitute citizen participation section that changed the groundrules from a weak citizens' advisory role to a strong shared power agreement. Philadelphia's application to HUD included the citizens' substitution word for word. (It also included a new citizen prepared introductory chapter that changed the city's description of the model neighborhood from a paternalistic description of problems to a realistic analysis of its strengths, weaknesses, and potentials.)

Consequently, the proposed policy-making committee of the Philadelphia CDA was revamped to give five out of eleven seats to the residents' organization, which is called the Area Wide Council (AWC). The AWC obtained a subcontract from the CDA for more than \$20,000 per month, which it used to maintain the neighborhood organization, to pay citizen leaders \$7 per meeting for their planning services, and to pay the salaries of a staff of community organizers, planners, and other technicians. AWC has the power to initiate plans of its own, to engage in joint planning with CDA committees, and to review plans initiated by city agen-

cies. It has a veto power in that no plans may be submitted by the CDA to the city council until they have been reviewed, and any differences of opinion have been successfully negotiated with the AWC. Representatives of the AWC (which is a federation of neighborhood organizations grouped into sixteen neighborhood "hubs") may attend all meetings of CDA task forces, planning committees, or subcommittees.

Though the city council has final veto power over the plan (by federal law), the AWC believes it has a neighborhood constituency that is strong enough to negotiate any eleventh-hour objections the city council might raise when it considers such AWC proposed innovations as an AWC Land Bank, an AWC Economic Development Corporation, and an experimental income maintenance program for 900 poor families.

7. DELEGATED POWER

Negotiations between citizens and public officials can also result in citizens achieving dominant decision-making authority over a particular plan or program. Model City policy boards or CAA delegate agencies on which citizens have a clear majority of seats and genuine specified powers are typical examples. At this level, the ladder has been scaled to the point where citizens hold the significant cards to assure accountability of the program to them. To resolve differences, powerholders need to start the bargaining process rather than respond to pressure from the other end.

Such a dominant decision-making role has been attained by residents in a handful of Model Cities including Cambridge, Massachusetts; Dayton, and Columbus, Ohio; Minneapolis, Minnesota; St. Louis, Missouri; Hartford and New Haven, Connecticut; and Oakland, California.

In New Haven, residents of the Hill neighborhood have created a corporation that has been delegated the power to prepare the entire Model Cities plan. The city, which received a \$117,000 planning grant from HUD, has subcontracted \$110,000 of it to the neighborhood corporation to hire its own planning staff and consultants. The Hill Neighborhood Corporation has eleven representatives on the twenty-one-member CDA board which assures it a majority voice when its proposed plan is reviewed by the CDA.

Another model of delegated power is separate and parallel groups of citizens and powerholders, with provision for citizen veto if differences of opinion cannot be resolved through negotiation. This is a particularly interesting coexistence model for hostile citizen groups too embittered toward city hall—as a result of past "collaborative efforts"—to engage in joint planning.

Since all Model Cities programs require approval by the city council before HUD will fund them, city councils have final veto powers even when citizens have the majority of seats on the CDA Board. In Richmond, California, the city council agreed to a citizens' counter-

veto, but the details of that agreement are ambiguous and have not been tested.

Various delegated power arrangements are also emerging in the Community Action Program as a result of demands from the neighborhoods and OEO's most recent instruction guidelines which urged CAAs "to exceed (the) basic requirements" for resident participation.¹⁴ In some cities, CAAs have issued subcontracts to resident dominated groups to plan and/or operate one or more decentralized neighborhood program components like a multipurpose service center or a Headstart program. These contracts usually include an agreed upon line-by-line budget and program specifications. They also usually include a specific statement of the significant powers that have been delegated, for example: policy-making; hiring and firing; issuing subcontracts for building, buying, or leasing. (Some of the subcontracts are so broad that they verge on models for citizen control.)

8. CITIZEN CONTROL

Demands for community controlled schools, black control, and neighborhood control are on the increase. Though no one in the nation has absolute control, it is very important that the rhetoric not be confused with intent. People are simply demanding that degree of power (or control) which guarantees that participants or residents can govern a program or an institution, be in full charge of policy and managerial aspects, and be able to negotiate the conditions under which "outsiders" may change them.

A neighborhood corporation with no intermediaries between it and the source of funds is the model most frequently advocated. A small number of such experimental corporations are already producing goods and/or social services. Several others are reportedly in the development stage, and new models for control will undoubtedly emerge as the have-nots continue to press for greater degrees of power over their lives.

Though the bitter struggle for community control of the Ocean Hill-Brownsville schools in New York City has aroused great fears in the headline reading public, less publicized experiments are demonstrating that the have-nots can indeed improve their lot by handling the entire job of planning, policy-making, and managing a program. Some are even demonstrating that they can do all this with just one arm because they are forced to use their other one to deal with a continuing barrage of local opposition triggered by the announcement that a federal grant has been given to a community group or an all black group.

Most of these experimental programs have been capitalized with research and demonstration funds from the Office of Economic Opportunity in cooperation with other federal agencies. Examples include:

1. A \$1.8 million grant was awarded to the Hough Area Development Corporation in Cleveland to plan economic development programs in the ghetto and

to develop a series of economic enterprises ranging from a novel combination shopping-center-public-housing project to a loan guarantee program for local building contractors. The membership and board of the non-profit corporation is composed of leaders of major community organizations in the black neighborhood.

2. Approximately \$1 million (\$595,751 for the second year) was awarded to the Southwest Alabama Farmers Cooperative Association (SWAFCA) in Selma, Alabama, for a ten-county marketing cooperative for food and livestock. Despite local attempts to intimidate the coop (which included the use of force to stop trucks on the way to market), first year membership grew to 1,150 farmers who earned \$52,000 on the sale of their new crops. The elected coop board is composed of two poor black farmers from each of the ten economically depressed counties.

3. Approximately \$600,000 (\$300,000 in a supplemental grant) was granted to the Albina Corporation and the Albina Investment Trust to create a black-operated, black-owned manufacturing concern using inexperienced management and unskilled minority group personnel from the Albina district. The profit-making wool and metal fabrication plant will be owned by its employees through a deferred compensation trust plan.

4. Approximately \$800,000 (\$400,000 for the second year) was awarded to the Harlem Commonwealth Council to demonstrate that a community-based development corporation can catalyze and implement an economic development program with broad community support and participation. After only eighteen months of program development and negotiation, the council will soon launch several large-scale ventures including operation of two supermarkets, an auto service and repair center (with built-in manpower training program), a finance company for families earning less than \$4,000 per year, and a data processing company. The all black Harlem-based board is already managing a metal castings foundry.

Though several citizen groups (and their mayors) use the rhetoric of citizen control, no Model City can meet the criteria of citizen control since final approval power and accountability rest with the city council.

Daniel P. Moynihan argues that city councils are representative of the community, but Adam Walinsky illustrates the nonrepresentativeness of this kind of representation:¹⁵

Who . . . exercises "control" through the representative process? In the Bedford-Stuyvesant ghetto of New York there are 450,000 people—as many as in the entire city of Cincinnati, more than in the entire state of Vermont. Yet the area has only one high school, and 80 per cent of its teen-agers are dropouts; the infant mortality rate is twice the national average; there are over 8000 buildings abandoned by everyone but the rats, yet the area received not one dollar of urban renewal funds

during the entire first 15 years of that program's operation; the unemployment rate is known only to God.

Clearly, Bedford-Stuyvesant has some special needs; yet it has always been lost in the midst of the city's eight million. In fact, it took a lawsuit to win for this vast area, in the year 1968, its first Congressman. In what sense can the representative system be said to have "spoken for" this community, during the long years of neglect and decay?

Walinsky's point on Bedford-Stuyvesant has general applicability to the ghettos from coast to coast. It is therefore likely that in those ghettos where residents have achieved a significant degree of power in the Model Cities planning process, the first-year action plans will call for the creation of some new community institutions entirely governed by residents with a specified sum of money contracted to them. If the ground-rules for these programs are clear and if citizens understand that achieving a genuine place in the pluralistic scene subjects them to its legitimate forms of give-and-take, then these kinds of programs might begin to demonstrate how to counteract the various corrosive political and socioeconomic forces that plague the poor.

In cities likely to become predominantly black through population growth, it is unlikely that strident citizens' groups like AWC of Philadelphia will eventually demand legal power for neighborhood self-government. Their grand design is more likely to call for a black city hall, achieved by the elective process. In cities destined to remain predominantly white for the foreseeable future, it is quite likely that counterpart groups to AWC will press for separatist forms of neighborhood government that can create and control decentralized public services such as police protection, education systems, and health facilities. Much may depend on the willingness of city governments to entertain demands for resource allocation weighted in favor of the poor, reversing gross imbalances of the past.

Among the arguments against community control are: it supports separatism; it creates balkanization of public services; it is more costly and less efficient; it enables minority group "hustlers" to be just as opportunistic and disdainful of the have-nots as their white predecessors; it is incompatible with merit systems and professionalism; and ironically enough, it can turn out to be a new Mickey Mouse game for the have-nots by allowing them to gain control but not allowing them sufficient dollar resources to succeed.¹⁵ These arguments are not to be taken lightly. But neither can we take lightly the arguments of embittered advocates of community control—that every other means of trying to end their victimization has failed!

NOTES

¹ The literature on poverty and discrimination and their effects on people is extensive. As an introduction, the following will be

helpful: B. H. Bagdikian, *In the Midst of Plenty: The Poor in America* (New York: Beacon, 1964); Paul Jacobs, "The Brutalizing of America," *Dissent*, XI (Autumn 1964), p. 423-8; Stokely Carmichael and Charles V. Hamilton, *Black Power: The Politics of Liberation in America* (New York: Random House, 1967); Eldridge Cleaver, *Soul on Ice* (New York: McGraw-Hill, 1968); L. J. Duhal, *The Urban Condition; People and Policy in the Metropolis* (New York: Basic Books, 1963); William H. Grier and P. M. Cobbs, *Black Rage* (New York: Basic Books, 1968); Michael Harrington, *The Other America: Poverty in the United States* (New York: Macmillan, 1962); Peter Marris and Martin Rein, *Dilemmas of Social Reform: Poverty and Community Action in the United States* (New York: Atherton Press, 1967); Mollie Orshansky, "Who's Who Among the Poor: A Demographic View of Poverty," *Social Security Bulletin*, XXVII (July 1965), 3-32; and Richard T. Titmuss, *Essays on the Welfare State* (New Haven: Yale University Press, 1968).

² The poster is one of about 350 produced in May or June 1968 at Ateliers Populaire, a graphics center launched by students from the Sorbonne's École des Beaux Art and École des Arts Decoratifs.

³ This typology is an outgrowth of a more crude typology I circulated in March 1967 in a HUD staff discussion paper titled "Rhetoric and Reality." The earlier typology consisted of eight levels that were less discrete types and did not necessarily suggest a chronological progression: Inform, Consult, Joint Planning, Negotiate, Decide, Delegate, Advocate Planning, and Neighborhood Control.

⁴ For an article of some possible employment strategies, see, Edmund M. Burke, "Citizen Participation Strategies," *Journal of the American Institute of Planners*, XXXIV, No. 5 (September 1968), 290-1.

⁵ U.S., Department of Housing and Urban Development, *Workable Program for Community Improvement, Answers on Citizen Participation*, Program Guide 7, February, 1966, pp. 1 and 6.

⁶ David Austin, "Study of Resident Participants in Twenty Community Action Agencies," CAP Grant 9499.

⁷ Robert Coles, "Social Struggle and Weariness," *Psychiatry*, XXVII (November 1964), 305-15. I am also indebted to Daniel M. Fox of Harvard University for some of his general insights into therapy being used as a diversion from genuine citizen participation.

⁸ See, Gordon Fellman, "Neighborhood Protest of an Urban Highway," *Journal of the American Institute of Planners*, XXXV, No. 2 (March 1969), 118-22.

⁹ James V. Cunningham, "Resident Participation, Unpublished Report prepared for the Ford Foundation, August 1967, p. 54.

¹⁰ Interview with Maxine Kurtz, Technical Director, Denver CDA.

¹¹ U.S., Department of Housing and Urban Development, "Citizen Participation in Model Cities," *Technical Assistance Bulletin*, No. 3 (December 1968).

¹² Organization for Social and Technical Innovation, *Six-Month Progress Report to Office of Economic Opportunity, Region 1*, February 1, 1969, pp. 27, 28, and 35.

¹³ In Cambridge, Massachusetts, city hall offered to share power with residents and anticipated the need for a period in which a representative citizens group could be engaged, and the ambiguities of authority, structure, and process would be resolved. At the request of the mayor, HUD allowed the city to spend several months of Model Cities planning funds for community organization activities. During these months, staff from the city manager's office also helped the residents draft a city ordinance that created a CDA composed of sixteen elected residents and eight appointed public and private agency representatives. This resident-dominated body has the power to hire and fire CDA staff, approve all plans, review all model city budgets and contracts, set policy, and so forth. The ordinance, which was unanimously passed by the city council also includes a requirement that all Model City plans must be approved by a majority of residents in the neighborhood through a referendum. Final approval power rests with the city council by federal statute.

¹⁴ U.S., Office of Economic Opportunity, *OEO Instruction, Participation of the Poor in the Planning, Conduct and Evaluation of Community Action Programs* (Washington, D.C.: December 1, 1968), pp. 1-2.

¹⁵ Adam Walinsky, "Review of *Maximum Feasible Misunderstanding*" by Daniel P. Moynihan, *New York Times Book Review*, February 2, 1969.

¹⁶ For thoughtful academic analyses of some of the potentials and pitfalls of emerging neighborhood control models, see, Alan Altshuler, "The Demand For Participation in Large American Cities," An Unpublished Paper prepared for the Urban Institute, December 1968; and Hans B. C. Spiegel and Stephen D. Mittenhal, "Neighborhood Power and Control, Implications for Urban Planning," A Report prepared for the Department of Housing and Urban Development, November 1968.