

REGIONAL TRANSPORTATION ADVISORY COUNCIL



March 9, 2017

David Mohler, Chair
Boston Region Metropolitan Planning Organization
10 Park Plaza, Suite 4150
Boston, MA 02116

RE: Amendment to Public Participation Plan to Reduce Public Comment Period

Dear Mr. Mohler,

As the chair of the Regional Transportation Advisory Council (Advisory Council), I am writing to express concerns that the Advisory Council membership has with the proposal to amend the Public Participation Plan (PPP) to shorten the public comment period for the LRTP, TIP, and UPWP to 21 days.

We understand that the justification for shortening the public comment period is a need to bring the schedule of the TIP more into alignment with the STIP and CIP. We support the better alignment of these schedules in principle, but we would like to raise some concerns about the proposed PPP amendment as the method of accomplishing this goal:

1. Certain stakeholders, such as those who require a significant review process (such as a City or Town) or those who meet monthly and must vote to approve feedback (such as the Advisory Council), may find it difficult to meet these shortened deadlines.
2. Because of differences in process, it seems potentially inappropriate to apply the amendment uniformly to all three document certification activities. For example, municipalities have a strong motivation to be engaged in TIP development early if they have a project in the universe. However, for the LRTP, the final public comment period might have much more value for stakeholders who have not been as engaged in the full process.

The Advisory Council asks that this overarching amendment to the PPP not be approved without further assessment. If the strategy to shorten the public comment period is viewed as the only solution given this year's timeline, we ask that this be a trial year, and before amending the PPP going forward, we respectfully ask the following:

1. Have MPO staff evaluate whether the short-term decrease of the public comment period significantly impacted the ability of stakeholders to provide input into the process. Determine which stakeholders it most negatively impacts and if there are ways to mitigate this impact.
2. Consider where there are other opportunities to tighten the schedules and bring them into alignment without shortening the public comment period and clearly communicate that these opportunities have been explored. For example, we are interested in learning more about whether target funding sources can be announced earlier and therefore move up the entire process.

3. If after careful analysis it is still recommended to shorten the comment period, consider only shortening it for the TIP, or the TIP and UPWP. In particular, 21 days does not seem like adequate time to review a document as complex as the LRTP.

We ask that the MPO staff provide a clear justification for why other methods will not work before the PPP amendment is approved. We thank you for your consideration of stakeholders' concerns with this proposal.

Sincerely,

Tegin Teich Bennett

Chair, Regional Transportation Advisory Council



For a thriving New England

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March 1, 2017

VIA EMAIL (jrowe@ctps.org)

Jennifer Rowe, Manager Public Participation Program
Central Transportation Planning Staff
10 Park Plaza, Suite 2150
Boston, MA 02116

RE: Boston Metropolitan Planning Organization (MPO) Public Participation Plan Amendment

Dear Ms. Rowe:

I write on behalf of Conservation Law Foundation (CLF) to provide the following comments in response to the MPO's proposal to shorten its public review and comment period for draft documents and amendments from 30 to 21 days.

We greatly appreciate the thoughtful approach the MPO is taking to this proposed amendment to its public participation plan. The request to shorten the MPO's formal public comment period was made by the Massachusetts Department of Transportation (MassDOT). It is our understanding that the objective behind this request is to align the TIP and Capital Investment Plan processes and to complete them by the beginning of the state fiscal year, which is a laudable goal. Based on years of experience commenting on the TIP, LRTP, and UPWP, however, we are concerned that shortening the public comment period would negatively impact public participation.

A shortened public participation period is likely to negatively impact public participation by individuals and organizations not actively engaged in the MPO process on a regular basis. Comments from representatives of organizations which require an internal approval process could also be affected. Likewise, coalitions or organizations that meet on a monthly basis could be challenged by this proposed rule. Finally, we are afraid that participation by people with disabilities or from disadvantaged communities could be chilled. It is therefore our hope that the MPO can find a way to achieve MassDOT's goal of aligning the TIP and CIP processes without requiring a shortened comment period.

Thank you for your consideration of these comments. If you have any questions, I can be reached by phone at (617) 850-1739 or by email at rmares@clf.org.

Sincerely,

Rafael Mares
Vice President and Program Director,
Healthy Communities and Environmental Justice