

Appendix E—Public Comment Letters and Responses

April 9, 2019

To: Annette Demchur
Boston Region Metropolitan Planning Organization
10 Park Plaza, Suite 2150
Boston MA, 02116

From: LivableStreets Alliance

Re: Draft Boston Metropolitan Planning Organization Public Participation Plan

Dear Ms. Demchur,

Thank you for inviting public comment on this draft of the Public Participation Plan. For over 13 years, LivableStreets Alliance has advocated for streets that connect people to the places where they live, work and play.

Our current programs include advocating for:

- **Emerald Network:** our vision for a 200-mile system of greenways in Greater Boston
- **Vision Zero:** the effort to systematically improve traffic safety in cities and towns
- **Better Buses:** systemwide improvements to optimize and prioritize bus transit

We were happy to see the steps the Boston Region MPO has taken to improve opportunities for public participation. Based on the plan, the proposed changes are supported by online engagement tools aimed at keeping people up to date; including a new twitter presence, a blog, and improved information visualizations. Activating these channels is an important step to make the Transportation Improvement Program (TIP) and Long Range Transportation Plan (LRTP) processes better known to the public, however, we are concerned that these improvements do not go far enough to justify shortening the comment period from 30 to 21 days. More intensive ways of collecting feedback are needed to ensure that people understand and are aware of these processes.

In 2017, the MPO presented a similar proposal to shorten the public comment period. However, community members and the MPO Advisory Board both raised concerns. Therefore, we were surprised to see this idea on the table again, with seemingly no additional changes. It is unclear what motivated this proposal.

One of our concerns is that the improvements do not improve access to the public in a meaningful way. The majority of the improvements are limited to those with online access. While online content is accessible for many, those who are the most vulnerable users, including low

income residents, many seniors, and some people with disabilities, may not have the skills or know-how to access these materials and comment in a meaningful way.

The perceived benefits of social media and emails are that they can reach large numbers of people quickly and provide information without the need to show up to meetings. However, with only 3,200 email addresses and 1,035 followers on Twitter, these numbers fall far below a meaningful percent of the population in the 97 cities and towns within the Boston MPO region.

We want to stress the importance of consulting within the communities when developing these various transportation funding plans. These are important opportunities for communities to be able to fund large capital projects but the language, metrics, and processes behind determining and allocating funding for these projects is neither written or presented in terms that will be easily understood by the average person. This severely limits the potential for the majority of people to comprehend and comment on projects within their communities. More meaningful engagement is needed in order to help people understand the process, why these projects matter, and share their comments.

Given the complexity of how these processes work, it is important to provide this information in person, in easily understood language for the general public, and allow opportunities for questions. The meetings highlighted in this plan as most directly related to the TIP and Unified Planning Work Program (UPWP) are information sessions. These information sessions are explicitly noted to be “geared to representatives who prepare their municipality’s or other entity’s official inputs” (p. 34). We are disappointed to see the meetings being presented only in this way. According to the Federal Public Participation Mandate, the onus is on the MPO to ensure that the public has early and continuing involvement. Given the location, timing, and content of these meetings, we do not believe these information sessions adequately address the needs of the public to be informed. We urge you to be more proactive in your outreach by going to the public, not requiring them to come to the MPO.

Due to the proposed adjustments to the comment period, we think it is necessary to make further improvements to the Public Participation Plan. We suggest adding specific metrics to ensure that the MPO is reaching an adequate number of members of the public and the ability to adjust processes based on successful public engagement and understanding. These metrics could include a specific percent of the population reached or the creation of representational guidelines, to ensure an equitable subset of the population is engaged.

In addition to having a wide enough reach, we also strongly suggest clarifying the purpose of the TIP, LRTP, and UPWP. We recommend simplifying the messaging to get across the main points, and presenting this material in a diverse set of ways to reach the largest number of people possible. While members of the public don’t need to weigh in on specific project budgets

or metrics for project determination, they can and should be able to understand the process, the various proposed projects, and share their input.

Thank you for considering our comments. We look forward to seeing an expansion of a robust and inclusive public participation process.

Sincerely,

Kristiana Lachiusa
Community Engagement Coordinator
LivableStreets Alliance



BOSTON REGION METROPOLITAN PLANNING ORGANIZATION

Stephanie Pollack, MassDOT Secretary and CEO and MPO Chair
Annette Demchur and Scott A. Peterson, Co-interim Executive Directors, MPO Staff

April 29, 2019

Ms. Kristiana Lachiusa
Community Engagement Coordinator, LivableStreets Alliance
70 Pacific Street
Cambridge, Massachusetts 02139

Re: Comment On Draft Boston Metropolitan Planning Organization (MPO) Public Participation Plan

Dear Ms. Lachiusa:

Thank you for commenting on the 2019 draft amendment to the MPO's Public Participation Plan (Plan). The Massachusetts Department of Transportation (MassDOT) requested that all MPOs in the state reduce the public comment periods for their main certification documents—the Transportation Improvement Program (TIP), Unified Planning Work Program (UPWP), and the Long-Range Transportation Plan (LRTP)—from 30 to 21 days. The Boston Region MPO approved this change only for the TIP; the public review period for the UPWP and LRTP remain at 30 days. This change to the TIP review period was requested for two main reasons:

1. To better align with the development of MassDOT's two main capital plans—the Capital Investment Plan and the State Transportation Improvement Program (STIP), the latter of which is a compilation of all of the regional TIPs
2. To create a more efficient timeline for MPOs to approve project changes that need to be reflected in the STIP prior to the project being advertised for construction

If you would like more detail about this change and why it was requested, please do not hesitate to contact me.

As MPO staff, we have found that working to build relationships with stakeholder groups and encouraging them to engage early and often in the certification document development process is the most meaningful way to provide the public

with real opportunities to influence the content of the final LRTP, TIP, and UPWP documents. While the MPO welcomes input throughout the development process for each of its certification documents, we particularly encourage participation in the beginning stages of development. For the TIP and UPWP, this is in the fall and winter of each year, when staff conducts outreach to project and study proponents and evaluates projects. While the TIP and UPWP are on an annual cycle, the LRTP cycle is every four years. The LRTP uses input from the TIP and UPWP process in the first two years of the cycle, and staff ramps up its outreach for the LRTP Needs Assessment and final document in the final two years of the four-year cycle. The official public comment period for each document is important, however, comments submitted at that time are more likely to inform the next year or next plan's process rather than influencing changes to the individual document.

TIP amendments vary in their content and often do not impact projects funded by the MPO's regional target funds. Sometimes, they simply reflect the receipt of grants or the addition of information that was not available when the original document was finalized. As staff, we have found that for amendments, the difference between allowing 30 and 21 days for comment had no impact on the volume of comments we receive. We acknowledge that there are ways we could improve communications around the meaning and impact of TIP amendments.

MPO staff are currently in the process of hiring a new Executive Director as well as a Public Outreach Planner. Currently, one staff member works half the time on communications and the other half on administrative support to the MPO board. Our plan is to expand the work of public participation, engagement, and external communications as new hires fill these positions with new strategies and improved capacity to reach members of the public in their communities. These new and expanded efforts will be documented in our next Plan update.

In anticipation of updating the Plan, MPO staff are experimenting with new approaches such as the adoption of public comment management software to make it easier to measure the effectiveness of our efforts and help ensure that we are reaching a diverse cross-section of the population in our region. We are also pursuing collaboration with the public processes conducted by MPO member agencies like MassDOT and the Massachusetts Bay Transportation Authority. We are working to update our outreach materials, improve our website, and build relationships with agencies and advocacy groups that can magnify the impact we have. LivableStreets is a valuable partner in this work, and we look forward to collaborating with you to amplify public awareness and understanding of the MPO process.

Thank you for your feedback on this important document.

Sincerely,

A handwritten signature in black ink, appearing to read "Annette Demchur". The signature is fluid and cursive, with a large loop at the end.

Annette Demchur
Interim Co-Executive Director
Central Transportation Planning Staff