

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