

REGIONAL TRANSPORTATION ADVISORY COUNCIL



March 10, 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,



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Chair, Regional Transportation Advisory Council