
From: judy rose
Sent: Tuesday, July 15, 2014 11:28 PM
To: mhainesbenkhedda@baltometro.org
Subject: Re: Draft Public Participation Plan Open for Comment; Public Meetings July 17, 30 + Aug 6

Howdy Monica:

I scanned thru the draft plan. So far it looks just outstanding! Great job!

J

From: Katharine Rylaarsdam
Sent: Monday, July 21, 2014 3:26 PM
To: comments@baltometro.org
Subject: Comment for the BRTB - Public Participation Plan

First, a comment or two on your format. Some, perhaps many, of the people you want to get input from have limited web access. Your 22 pages take a long time to load with dialup--a form of internet connection still used by a significant minority of people, especially on limited incomes. If you make your documents so needlessly heavy on pictures and light on content, few of these people will wait long enough to find out what you have to say. You should NEVER provide important material in a format you haven't tested with a dialup connection. You're not there to be cute, you're there to communicate.

To top that off, clicking on the link for the long-range plan, for example, within that hard-won pdf file just leads to a very general page about the long-range plan in the same tab, not to anything substantive. That is a double error. Links should open by default in a new tab so people don't lose content they already have until they choose. And the link for a draft long-range plan and the dates of its comment period should appear clearly near the top of the page about it. Likewise, within the actual plan you should include a clear statement of the dates of the comment period; if the draft posted is so preliminary that you do not have dates, you should at least provide tentative dates, indicating that status, and never close a comment period earlier than first stated. If you want people to comment on your plans, you are going to have to start by providing them with your plans and letting them know when you will do so and when they can comment. Don't make them waste time searching through your website for information you can and should provide concisely. It's fine to provide it in more than one place, but don't omit it from the principal places related to specific plans. (It should be noted that this Draft Public Participation Plan, which I only learned of through a recent email, says there "will be" a review and comment period for the long-range plan, whereas the information on that page says that period happened some three months ago.)

Your intentions as expressed in the draft plan sound good, but judging by their presentation in that plan you have not yet given sufficient thought to their practical implementation.

From: Arthur Cohen
Sent: Friday, August 01, 2014 5:15 PM
To: comments@baltometro.org
Subject: Comments from b'more mobile on the BRTB's 2014 Draft Public Participation Plan
Attachments: b'more mobile comments on the BRTB's 2014 Draft Public Participation Plan.pdf; Public engagement rating - April 2014.pdf

August 1, 2014

TO THE BALTIMORE REGIONAL TRANSPORTATION BOARD:

Attached you will find the comments by *b'more mobile* on the BRTB's 2014 Draft Public Participation Plan. Please note that the comments also incorporate an added document attachment entitled: "PUBLIC ENGAGEMENT IN TRANSPORTATION PLANNING: The Superficial contrasted with the Substantial - -- How should we rate the MTA, the BRTB, and BDOT in 2014?"

Thank you.

- Art Cohen, Convenor
b'more mobile

August 1, 2014

Comments on the Baltimore Regional Transportation Board's
2014 DRAFT PUBLIC PARTICIPATION PLAN (DPPP)

NOTE: These comments will be directed entirely to three related sections of the DPPP:

- “Access for All” (page 12);
 - “Outreach to Traditionally Underserved Populations” (page 13); and
 - “Strategies for Outreach, Education and Engagement (pages 14-16).
-

There is special reference and attention paid in the DPPP to so-called “traditionally underserved populations.” These populations are defined on page 12 of the DPPP as being “low-income populations and minority populations” “...as well as other populations...including those with limited English proficiency..., low-literacy populations, seniors, persons with disabilities, and transit-dependent populations.” The source for this definition is a 521-page 2012 report from the Transportation Research Board of the National Academies (NCHRP, Report #710) “Practical Approaches for Involving Traditionally Underserved Populations in Transportation Decisionmaking” - certainly an authoritative source.

The DPPP goes on at page 13 to identify the “seven vulnerable populations” as follows:

- 1) people in poverty;
- 2) Hispanic/Latino, Non-Hispanic, Non-White Minorities;
- 3) Limited English Proficiency (LEP);
- 4) People with disabilities;
- 5) the elderly;
- 6) Car-less households.
- 7) [Apparently, there is an unintended omission here of the seventh population mentioned on page 12 of the DPPP - i.e. people with low-literacy.]

Techniques cited by the DPPP on page 13 to “intentionally seek out and work to build relationships with residents, community elders, and other leaders in traditionally underserved communities throughout the region” include a) “Person-to-person outreach”, b) “Coordinate with government agencies to conduct outreach”, and c) “Form alliances” with various institutions, centers, and organizations.

The key section of the DPPP describes 18 specific “strategies” about increasing “outreach, information, education, and involvement....” (pages 14-16). These are, in turn:

- 1) Baltometro.org;
- 2) Visualization techniques;
- 3) E-Newsletters and Social Media;

- 4) Produce and distribute Print Documents;
- 5) Maintain contact lists;
- 6) Develop an outreach and education program;
- 7) Publicize BRTB activities;
- 8) Partner with others that influence/conduct outreach;
- 9) Build relationships with stakeholders;
- 10) Seek out/build relationships with traditionally underserved community leaders and non-traditional participants;
- 11) Meet in convenient and accessible locations for optimal attendance;
- 12) Conduct interactive and informational workshops;
- 13) Hold open houses;
- 14) Hold public meetings;
- 15) Sponsor Webinars or Webcasts of Meetings;
- 16) Advertise Opportunities for Involvement;
- 17) Maintain and promote a speaker's bureau; and
- 18) Conduct surveys and focus groups.

These strategies generally seem to follow the current requirements of federal law and regulation governing public participation in transportation planning. However, as such, they represent a floor, a minimum, below which the BRTB is legally prohibited from going. Most of them certainly do not represent the best practices (referred to in passing on page 16) for reaching the traditionally underserved populations. This will be explained and examined directly below.

Let's look at each of the 18 strategies one-by-one:

- 1) Baltimoremetro.org - The DPPP says that this website is the “core tool” used to disseminate information. The large problem with that is that many of the “traditionally underserved populations” (hereinafter referred to by the shorthand acronym “TUPs”) do not have ready access to the Internet. Either they are not computer savvy, or they cannot afford to own personal IT or social media devices. It is also somewhat unrealistic to expect such persons to go regularly to a public library for computer access. In other words, it is reasonable to expect that many aspects of the so-called “digital divide” will apply to TUPs in ways which will limit both the extent and the quality of their engagement in transportation planning. So, although the BMC website contains information, it may not be readily available to TUPs.
- 2) Visualization techniques - These are useful additions to the printed word. In terms of being available to TUPs, however, it is essential that these techniques not be confined to or predominantly available only as internet presentations.
- 3) E-Newsletter and Social Media - Same concern as with #1 above.
- 4) Produce and Distribute Print Documents - This would be useful for all the TUPs except those with low literacy. There has to be some special effort made to reach them with the same information.
- 5) Maintain contact lists - What is essential here is that the people from among the TUPs who are often less socially “visible” to the planners make it onto these lists.

And refer also to item #10 below.

- 6) Develop an outreach and education program - Again, as in #4 above, it is important that the pamphlets, brochures, and workshop outlines mentioned here be designed for accessibility by people with low-literacy.
- 7) Publicize BRTB activities - This is a keystone for getting the public involved. The use of newsletters and other media and press releases is important. However, as pointed out already in #1 above, it is also important not to place too much reliance on the BMC/BRTB website for those who do not have access to the Internet.
- 8) Partner with others that influence/conduct outreach - The “others” listed here include “a wide range of outreach professionals, community groups, jurisdictions and agencies.” Of that list, the most important entity for reaching the TUPs is the wide range of community groups.
- 9) Build relationships with stakeholders - A good idea, but again, dependent on inclusion of TUPs.
- 10) Seek out/build relationships with traditionally underserved community leaders and non-traditional participants - This is especially important, but only as effective as the breadth of the effort which is undertaken. In other words, it is essential to reach out to as many such community leaders as possible, without being content with just a few leaders who have served as fall-backs over past years. Stated another way, the community representation must not be simply token in nature.
- 11) Meet in convenient and accessible locations for optimal attendance - This is just fine as far as it goes, but it does not go far enough. It omits any reference to day or time, which are also essential parameters in seeking attendance at meetings. Regardless of location, a meeting held during traditional working hours is likely to attract far less people, including TUPs. In fact, it may be necessary to conduct a meeting with certain communities at two different days and times in order to reach a critical mass of community members.
- 12) Conduct interactive and informational workshops - Definitely the best way to go. However, the interactions and information optimally should be specifically designed for reaching and engaging the TUPs.
- 13) Hold open houses - Again, a good idea. However, it is not good enough to state, as is done here, that these should be “[s]taffed by knowledgeable facilitators ***whenever practical***” [bolded italics added here for emphasis]. Under no circumstances should open house facilitators be provided who are not knowledgeable. Stated another way, if you really cannot supply knowledgeable facilitators, you should not bother with the open house. For all the money made available to transportation agencies for transportation planning, there really is no excuse for not being able to supply knowledgeable facilitators.
- 14) Hold public meetings - This item reads in full: “Provide information and a setting for formal public comment or discussion at appropriate intervals in the planning

process.” While on its surface, this reads reasonably, the problematic word is “appropriate”. What is appropriate, who determines it, and how? In the opinion of *b'more mobile*, true public participation requires that the public should be fully engaged in an ongoing, unbroken manner from the very beginning of the transportation planning process. Far too often, members of the public, and especially TUPs, have been invited to only intermittent engagement with the planning process, and then after many of the important planning decisions have already been made. See the attachment below “PUBLIC ENGAGEMENT IN TRANSPORTATION PLANNING....”

- 15) Sponsor Webinars or Webcasts of Meetings - On its surface, this sounds like a good idea. However, as far as TUPs are concerned, it suffers from the same constraints discussed above under items #s 1, 2, 3, and 7.
- 16) Advertise Opportunities for Involvement - This is an element which is essential to help effectuate any public engagement in transportation planning. It is especially important for reaching TUPs.
- 17) Maintain and promote a speaker's bureau - Already in existence, and a useful thing to continue.
- 18) Conduct surveys and focus groups - What would a public participation program be without surveys and focus groups? However, these are no substitute for genuine community contact with the TUPs. At the very least, special efforts should be made so that surveys are conducted and focus groups are held with as many TUPs as possible. To do so will require considerable effort on the part of BMC/BRTB staff.

It is important to keep in mind that reaching TUPs is paramount. So much of the current transportation planning in the Baltimore Metropolitan Region and elsewhere around the US goes forward without significant TUPs involvement. Typically, TUPs get involved “after the fact”, by protesting, often (but not always) futilely, that their interests have been overlooked.

As an example of contrastS between what is often the current practice on the one hand, and optimal or best practice on the other, see the attached matrix (“PUBLIC ENGAGEMENT IN TRANSPORTATION PLANNING”) for a comparison of “superficial” with “substantial” public engagement in transportation planning.

It is only through sincere and sustained efforts to reach TUPs that we will ever be able to do away with the designation of “Traditionally Underserved Populations” and put an end to this long-standing “tradition.” This may sound to some like a pipe dream, but it is better to see it as an achievable vision, and to go forward with that achievement as a principal goal, getting ever closer to reaching it through time.

* * *

- one attachment: “PUBLIC ENGAGEMENT IN TRANSPORTATION PLANNING: The Superficial contrasted with the Substantial --- How should we rate the MTA, the BRTB, and BDOT in 2014?” - from *b'more mobile* - April 2014.

PUBLIC ENGAGEMENT IN TRANSPORTATION PLANNING: The Superficial contrasted with the Substantial --- How should we rate the MTA, the BRTB, and BDOT in 2014?

Superficial	Substantial
1) MINOR PUBLIC ROLE: The public is viewed as "providing input" by making essentially reactive, passive responses to plans and budgets prepared by planning and program officials and their consultants.	A) FULL PUBLIC ROLE: The public is treated as a full partner throughout the planning process, with its suggestions and reactions solicited at every stage by planning and program officials and their consultants.
2) MINOR PUBLIC ROLE: Selected members of the public receive newsletters, and other mailings, or those with access to computers are able to view +/- or copy information from the internet.	B) FULL PUBLIC ROLE: The public participants represent a wide variety of constituents, and their deliberations are regularly made available to members of the general public through libraries and the media.
3) MINOR PUBLIC ROLE: Members of the public may attend open houses or other public informational meetings and "stakeholder summits" or take tours.	C) FULL PUBLIC ROLE: As needed, effective technical training is provided for all representatives of the public who are to work with the transportation planning officials.
4) MINOR PUBLIC ROLE: The public may be given surveys to take, but detailed ongoing survey feedback is often not provided.	D) FULL PUBLIC ROLE: The public is included in the planning process from the very start, working side by side with planning and program officials and their consultants in their offices - during normal work hours.
5) POOR TIMING: The public is involved only after the drafts have been prepared by the planning officials and their consultants.	
6) POOR TIMING: The public gets notified about and sees a full draft only a few weeks before it is to be finally decided upon (other than summaries which may be published earlier with little or nothing against which to verify their contents or points of view).	E) FULL PUBLIC ROLE: Public participants are included on a continuous basis - throughout the entire planning process and until final decisions on the plans. Plenty of time is allocated in which to conduct the transportation planning process. Other than publishing a general planning schedule, unless there are schedule changes, it is less necessary to constantly notify the public because the planning is ongoing and follows the schedule.
7) POOR TIMING: Officials do most of the planning under great time pressure at the last minute, thus requiring the public to react under similar conditions.	
8) MINOR PUBLIC ROLE: Documents (and even the summary) are presented to the public in very technical language, with technical graphics [i.e. "untranslated"].	F) FULL PUBLIC ROLE: Plan documents are written in very plain language, with clear graphics, showing an intention to meet a high standard for public communication.
9) MINOR PUBLIC ROLE: Documents are very voluminous, without meaningful summaries.	G) FULL PUBLIC ROLE: Plan documents and summaries are written concisely in the main body of the document, with technical documentation put in easy-to-use appendices.
10) MINOR PUBLIC ROLE: The public gets a chance to review the materials which have already been drafted by the planning officials.	H) FULL PUBLIC ROLE: Public participants in the planning process provide suggestions and feedback throughout the process. ---> <i>please turn over the page</i> --->

<i>Superficial</i>	<i>Substantial</i>
<p>11) MINOR PUBLIC ROLE: The public gets a chance to make written comments.</p>	<p>- see H) above on previous page -</p>
<p>12) MINOR PUBLIC ROLE: The public may testify orally at public hearings.</p>	
<p>13) MINOR PUBLIC ROLE: Official responses to this public input are produced, but they may be sketchy and usually do not address underlying policy questions.</p>	<p>I) FULL PUBLIC ROLE: All public suggestions and feedback are documented, along with detailed official responses to each of them.</p>
<p>14) PUBLIC'S NEED TO FORCE INCLUSION: In order to obtain the planning and budgetary documents, and their supportive materials, the public has to make requests for them.</p>	<p>J) FULL PUBLIC ROLE: Any resources used by or made available to planning officials and their consultants are automatically and immediately also made available to their planning partners who represent the public. Thorough documentation is made of all such official use.</p>
<p>15) PUBLIC'S NEED TO FORCE INCLUSION: The public sometimes finds it necessary to file Freedom of Information (FOI) requests for documents, which by law allows a time delay of up to 30 days.</p>	
<p>16) PUBLIC'S NEED TO FORCE INCLUSION: With such FOI requests, members of the public usually must pay for documents copied for them.</p>	<p>K) FULL PUBLIC ROLE: There is payment of travel, parking, other expenses, plus a modest stipend for the time taken by all the public representatives who participate in the transportation planning process.</p>
<p>17) PUBLIC'S NEED TO FORCE INCLUSION: Official meetings and votes of public transportation agencies take place behind closed doors, so the public finds it necessary to file objections under the Open Meetings Law, a cumbersome and uncertain procedure.</p>	<p>L) FULL PUBLIC ROLE: All official deliberations and votes about transportation planning and budgets are conducted openly, and the proceedings are recorded in detail. The meetings may be attended by and the records inspected by the general public.</p>
<p>18) IGNORANCE OF REALITIES: Transportation officials may or may not regularly use or ride public transportation. Many top officials have official cars and drivers to take them around. They live at a considerable "social distance" from the burdens endured by transit-dependent and other transit riders.</p>	<p>M) FULL PUBLIC ROLE: As reality tests for transportation officials, all such officials should be required at least once every year to get to their jobs and other activities solely using public transportation for one full work-week and weekend, and to publicly document and explain any problems they experience.</p>
<p><u>RATIONALE</u> - <i>Transparency is not viewed as important, or officials just do not know how to make it possible. There is skepticism about public preferences and input, and the ability to learn from public participants. There is technical (but superficial or token) compliance with federal public participation regulations and guidelines. Public participation is seen as too slow and cumbersome.</i></p>	<p><u>RATIONALE</u> - <i>This planning addresses public (not private) transportation, so by its very nature should <u>engage members of the public as full, equal, and informed partners</u>. Public transportation exists for the public and is paid for by transit users' fares and public tax dollars. Such fuller public participation has thus been the practice followed by MPOs in other metropolitan transportation regions.</i></p>

- THE END -

CAC COMMENTS ON DRAFT PUBLIC PARTICIPATION PLAN

The CAC commends staff for providing accurate and comprehensive information in the draft PPP and request that the BRTB incorporate the comments below into the PPP and the BRTB's public participation process.

COMMENTS AND QUESTIONS
Comment feature on BMC web pages? (ex: Disqus)
Measurements to track hits to website and social media? (Google Analytics)
Recommend landscape 8.5 x 11 format for rapid viewing online
Add subtitle to ensure those who aren't as familiar with the process what this plan is for such as... "... for transportation planning in the Baltimore region" "... how you can influence transportation decision-making in the region"
Explain abstract concepts more clearly; Reiterate purpose multiple times
Add graphic displays of this process (decision tree, flowchart, etc; example page 8 list of plans; how they work together, where are the opportunities for public input)
Getting Involved (TOC) - add blurb about CAC to this section also?
Two separate documents? Clear sections that separate for different audiences? 1 with public side of things and 1 with policies and procedures
This document does an excellent job of outlining the policies for the feds, staff, BRTB, etc but can do a better job to make it more accessible by the general public. Thought experiment @ call from reporter - if requested to provide a 300 word blurb about public participation plan, what would we say? Create a marketing piece to quickly and easily disseminate the quick highlights about who, what, where, why... brochure/executive summary/door hanger version "cheat sheet" with highlights (landscape, 700 word summary)
YouTube video clip of slide "transportation affects all of us, but not in the same way" and highlights of PPP

From: stuart stainman
Sent: Thursday, August 07, 2014 11:17 AM
To: Monica Haines Benkhedda
Cc: Greg Shafer
Subject: Public Participation Plan

Monica,
You did a great job on plan. Comments should have been sent before last night. Now that issue is open again, I have several comments.

Title: Public Participation Plan

Subtitle: for Transportation Planning in the Baltimore Metropolitan Area.

Need an introduction defining BRTB for public seeing this as an independent document. Some of info in "About Us", on p. 5 should be moved in front of Purpose (p. 3).

p. 3. First paragraph should include short summary of transport. planning process. para. 2, line 3. change to "when they can engage in".

Map on p. 4: Write in P.G., Montgomery Counties, Pennsylvania, Susquehanna R. Common complaint to BMC. The world is not flat nor ends at the region.

Stuart

From: Overbay, Steven
Sent: Friday, August 15, 2014 9:40 AM
To: comments@baltometro.org
Subject: Draft Public Participation Plan

The Chesapeake Science and Security Corridor (CSSC) has reviewed the Draft Public Participation Plan and concurs with all changes. We applaud your efforts which make it possible for commuters throughout the region to have a voice and be a part of the process. Thank you.

Steven Overbay

APG-CSSC Regional BRAC Office
BRAC Coordinator
410-273-5708 Office

From: John Cutonilli
Sent: Friday, August 15, 2014 6:11 PM
To: Monica Haines Benkhedda
Subject: Public Participation Plan

The public participation plan is vague to the point it does not really say much. Since there are no limits, the board can do whatever it wants. The plan needs to be rewritten with limits.

Purpose:

The plan indicates that it is “a guidebook for the public as to how and when they can be engaged in the planning and decision-making process.” yet does not describe or visualize the process. It does not describe how the statewide transportation process is coordinated and how the public can be engaged in the process. Describe and visualize these processes.

About Us:

The plan does not describe how the public should interact with the BMC vs the BRTB. e.g. Most of the tweets appear to come from an account representing the BMC. It is unclear if responding to this tweet will qualify as an interaction with the BRTB. e.g. Monica B. Haines Benkhedda sent an email about various comment periods. It is unclear if this email came from her, the BMC or the BRTB. Replies to this email would not be considered according to this plan. Describe how interactions like this should be handled.

The plan does not list the committees of the BRTB. It does not list how membership in the committees are selected or who they are.

Policies and goals:

All goals should be measurable. None of these goals have measurements attached to them. Provide measurable goals.

Who We Seek to Consult:

It is unclear how/when the various groups will be consulted. Provide details on how/when the various groups will be consulted.

It is also unclear how membership in the various groups is determined. Provide details.

The TIP talks about Transportation Management Associations. The plan is silent on this and does not discuss how one is formed.

Having Your Say

It appears that the public can comment on all aspects of the transportation planning process, but this section appears to only apply to certain aspects of the transportation planning process.

It appears from past experience that there is some kind of secret agreement that the BRTB does not need to provide the entire document for review. This plan should require the entire document be provided for review for the entire review period.

When the BRTB asks for comments on things, very little detail is provided. Often only a very short paragraph is provided detailing the road number and the amount of proposed spending for road projects or a short description of the project. No or limited visualizations of where or what is provided. I doubt anyone but those involved in the project actually understand enough about the projects to even make a comment.

It is unclear what they want us to comment on when they ask for comments. It appears that the project has already been decided. Are they asking if we support or reject the project? Do they want other options for completing the project? Do they want to know how it should be completed? What are they actually looking for?

Getting Involved

The notification methods are very passive and do not ensure that any of the groups you seek to consult are actually notified. Provide methods/guidelines to ensure that all groups are consulted.

The BRTB should provide advanced warning of comment periods.

Access for All

Most of the information is not provided as electronic data. Provide the data in electronically accessible formats.

Outreach To Traditionally Underserved Populations

The plan list VPI but does not provide any maps or calculation procedures to determine information/locations.

Strategies for Outreach, Education and Engagement

The baltometro.org website routinely contains out of date or dead links. One of the strategies should be to review the website and logs daily for missing/old info. e.g The link on the home page for transportation planning was dead for several weeks. e.g The bottom of the home page contains a link for an meeting that was more than a week ago. Clicking on the link gives an error.

The BRTB produces very little useful visualizations of data. They produce a lot of maps and such, but it is at a scale of the entire region. Trying to use or understand specifics is next to impossible. An example of this is Appendix E of the long range transportation plan. I get the general idea, but am unable to ascertain specifics of any of the issues. Provide map data in formats that allow the zooming to see appropriate levels of detail.

Evaluation

There are no performance measures listed. All of the measures are inputs. Provide measure that are dependant on performance.

Additional Resources

The additional resource do not include any of the actual legislation governing transportation planning. Please provide this information.

John Cutonilli
Baltimore, MD 21231