

# RESPONSE TO PUBLIC COMMENTS

## *BRTB Public Participation Plan*

*The BRTB received a number of comments on the draft Public Participation Plan, released for comment from Wednesday, July 2 through Thursday, August 14, 2014. Below is a summary of comments received and the BRTB's response and incorporation of these comments into the final draft PPP. The BRTB is scheduled to vote on the final PPP on Tuesday, September 23, 2014 at 9 a.m.*

## INTERESTED PARTIES

Unclear how and when various groups will be consulted. Provide details. *(J. Cutonilli)*

On page 8, the section entitled "Public Comment Periods" outlines the various comment periods in which the BRTB will, at minimum, consult the public. This section also notes that "other documents may also be made available for public comment."

Unclear how membership in various interested parties is determined. Specify. *(J. Cutonilli)*

We have added clarifying language to the bottom of page 7: "BMC staff maintains an extensive list of interested individuals and organizations who have expressed an interest or who have participated in previous transportation planning efforts. To be added to the list, contact the Public Involvement Coordinator at [comments@baltometro.org](mailto:comments@baltometro.org) or 410-732-0500 or, visit [www.baltometro.org](http://www.baltometro.org) and click on Contact Us."

List doesn't include Transportation Management Agencies (or how one is formed) *(J. Cutonilli)*

Transportation Management Associations (TMAs) are already included in the interested parties list under the categories of "Private Providers of Transportation or "Chambers of Commerce."

The PPP is not the appropriate place to describe how a TMA is formed. You can obtain an overview of TMA's at [www.vtppi.org/tm/tm44.htm](http://www.vtppi.org/tm/tm44.htm).

## HAVING YOUR SAY

It says public can comment on all aspects of transportation planning, but this section appear to apply only to certain aspects of the process. *(J. Cutonilli)*

On page 8, the section entitled "How to submit comments" details how members of the public can submit comments related to official comment periods (as listed in the "Public Comment Periods" section, also on page 8).

The BRTB also welcomes comments on a variety of transportation topics that are not part of any comment period. As such, it has outlined a process for the public to share these comments in the section "Public Participation at BRTB Meetings," seen at the top of page 9.

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Very little detail is provided when BRTB asks for comments on things. Little to no info or visualizations are included. Doubtful that anyone but those involved with a project understand enough to make a comment. There should be a requirement that an entire document must be provided for review for the entire review period. *(J. Cutonilli)*

The BRTB provides the necessary elements required for public review and for the BRTB members to make decisions. These include items such as summary information posted on our website and/or in printable flyer format, detailed project sheets or reports, and links to project or sponsor web sites for detailed information.

In addition, staff from the US FHWA has advised the BRTB that a readable, public-friendly version of the long-range transportation plan is allowable and encouraged. Technical details and background information are only required to be produced as part of FHWA technical review. If the public requests detailed information, these will be provided within reason and within a reasonable timeframe.

FHWA cited best practices and examples in the “Long Range Transportation [Plan Citizen-Friendly Best Practices](#)” report produced by the Florida Department of Transportation, Office of Policy Planning. These best practices include items that the BRTB adheres to such as: Easy access via the MPO’s website; Of a reasonable page-length; Free of excess information that could reasonably be located in ancillary documents (e.g., travel forecast model validation reports); and Inclusive of appropriate methods for presenting the report’s content (e.g., easy to understand charts and visual aids).

In an effort to address your concerns, clarifying language was added to page 8:

- # 1<sup>st</sup> bullet on 30-day comment period for the LRTP “(multi-year development with several opportunities to comment on goals, projects, executive summary, etc.)”
- # Expanded what information is provided: “Information necessary for the public to understand and comment on each document will be released to the public for review. This includes items such as a readable, public-friendly executive summary, information posted on our website and/or in printable flyer format, detailed project sheets or reports, and links to project or sponsor web sites for comprehensive information.”

Unclear what want comments on - Asking to support/reject the project? Options? Ideas for how to do project? *(J. Cutonilli)*

Thank you for this comment. We have been working to strengthen our communication efforts and the language we use to advertise opportunities for public comment. However, we are also looking at updating our use of polls, surveys, comment forms, and other tools that would allow the BRTB to ask specific questions and get specific input from the public.

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### GETTING INVOLVED

Notification methods don't ensure any groups you seek to consult are actually notified. Provide methods/guidelines to ensure all groups are consulted. *(J. Cutonilli)*

The BRTB reports monthly on public involvement activities to MDOT and FHWA/FTA. Additionally, for every comment period, the "Interested Parties" list is consulted and used as the backbone of all outreach. The BRTB recently moved its contacts to a newer system that makes updating, searching and reporting much easier and accessible to all staff as needed.

The BRTB self certifies annually, with documentation, to the activities it undertakes to meet federal requirements. Certification is conducted by FHWA/FTA/EPA every four years to ensure that the planning requirements are being satisfactorily implemented. The process includes a desk audit and several days of meetings to determine that the BRTB has conducted its business in a way that meets the requirements.

Provide advance notice of upcoming comment periods *(J. Cutonilli)*

Staff will work to update text on our website to clarify the upcoming and tentative dates for comment periods. In addition, we will work with our Public Advisory Committee to create some graphics that show typical plans and general schedule for development, as well as a *Guide to Transportation Planning*.

### EVALUATION

All goals should be measurable. None of these goals (p.6) have measurements attached to them. Provide measurable goals. *(J. Cutonilli)*

We apologize for any confusion. This section has been updated to reflect that these are principles guiding the BRTB's public participation process.

All measures listed here (p. 17-18) are inputs - provide measures that are dependent on performance. *(J. Cutonilli)*

The measures at the top of page 18 are quantitative measures to gauge reach. The surveys (p. 17) and the staff debriefs (p. 18) will allow for more qualitative evaluation of the BRTB's performance.

### ACCESS FOR ALL

Most info is not provided as electronic data. Provide this. *(J. Cutonilli)*

We are unsure of the electronic data you are requesting. Please clarify.

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### LIMITED ACCESS TO INTERNET

Many traditionally underserved populations do not have ready access to the internet. This “digital divide” will limit both the extent and the quality of their engagement in transportation planning, especially access to info on web, newsletters, and webinars. (*b'more mobile*)

Large files take long time to load with dial-up, which some - test load times for dial-up connections (*K. Rylaarsdam*)

The Pew Research Center reports that only [3% of Americans still use dial-up](#) and that [70% of American adults ages 18+ have a high-speed broadband connection at home](#) (May 2013). However, they also note that “one in five American adults does not use the internet. Senior citizens, those who prefer to take our interviews in Spanish rather than English, adults with less than a high school education, and those living in households earning less than \$30,000 per year are the least likely adults to have internet access.” [www.pewinternet.org/2012/04/13/digital-differences](http://www.pewinternet.org/2012/04/13/digital-differences).

The digital divide is clearly shrinking at a rapid pace; however it is clear that those who have been traditionally underserved make up a good portion of those who do not access the internet. That is the reason why the BRTB added the “Outreach to Traditionally Underserved” section on page 13 to the PPP, developed the Vulnerable Population Index (VPI) tool, schedules public meetings in communities, and is working to expand its person-to-person outreach to educate and engage traditionally underserved populations.

In the past, the BRTB sent copies of key documents open for comment to libraries. However, many documents were not displayed and/or very few comments were received as a result of this effort. As such, it was deemed ineffective and removed from the list of required policies. However, it is still included in the strategies “toolbox” on page 14-16. Staff has also begun discussions with local planning staff to identify the best locations in the region to display flyers/advertisements/documents in order to reach the widest possible audience and key stakeholders. Staff will also initiate contact with local libraries to identify the best way to share information with visitors.

### TRADITIONALLY UNDERSERVED POPULATIONS (p. 13)

Visualizations are useful additions to printed word, but it is essential that these techniques not be confined to or predominantly available only as internet presentations. Special efforts must be made to reach people with low-literacy. Print materials and workshops need to be designed with their ability to access information in mind. (*b'more mobile*)

Agreed. The public involvement coordinator and communications officer work together to develop outreach and marketing materials for the BRTB and work with staff on an ongoing basis to present information in a way that is easy-to-understand by individuals with a wide-range of reading levels.

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**Make special efforts to do surveys and focus groups with traditionally underserved populations. (*b'more mobile*)**

Thank you for this suggestion. We have added "Conduct surveys and focus groups with individuals and organizations/agencies that work with traditionally underserved individuals" to the list of potential techniques on page 13.

**These strategies 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. (*b'more mobile*)**

The reference on page 16 to best practices relates to speakers invited to share information on best practices from around the country or current topics of interest to the region. The BRTB schedules such speakers for its meetings and special events.

Specific strategies related to outreach to traditionally underserved populations can be found on page 13.

**It is essential that individuals and community groups who are traditionally underserved are included on the BRTB's contact lists. Do not be content with just including a few key representatives of traditionally underserved populations. Community representation must not simply be token in nature. (*b'more mobile*)**

Agreed. Staff has selected a new Customer Relationship Management tool that allows for greater tracking and management of interested parties and mailing lists. If you have any recommendations on organizations we should reach out to, please let us know. Similarly, interested parties who wish to be added to the Interested Parties mailing list may contact the Public Involvement Coordinator at 410-732-0500 or [comments@baltometro.org](mailto:comments@baltometro.org).

**Advertising (p.16) - This is an essential tool to reach traditionally underserved populations. (*b'more mobile*)**

We understand that, at times, advertising can be an effective method for informing and educating the public, including traditionally underserved populations. However, in the past, we have not found print advertising to be a particularly effective tool in reaching members of the public. In addition, print advertising is very expensive and with limited public dollars available, we decided to drop this requirement in the policy of notification for all comment periods. This is the reason why this technique is listed in the PPP in our "toolbox" of strategies for outreach and education as seen on page 16. The BRTB will continue to utilize advertising when appropriate and cost-effective.

**No maps are procedures for how the VPI was developed is included (p.13) (*J. Cutonilli*)**

We appreciate your interest in learning more about the Vulnerable Populations Index. BMC staff will look into adding information about the VPI to the BMC website in the near future.

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This section of the PPP provides a basic overview of the VPI tool and how it can be used by staff to conduct outreach. Presentations on the development of the VPI were made to the Technical Committee in March 2013 and to the public in July 2013 at a workshop on Environmental Justice and Title VI. Details of the VPI are included in our Title VI reporting documentation.

## **STRATEGIES FOR OUTREACH AND ENGAGEMENT** (p. 14-16)

Meet in convenient and accessible locations (p. 15) - No mention of times. Meetings held during traditional work hours less likely to get people. May be necessary to conduct meeting with certain communities at different days and times to reach critical mass. (*b'more mobile*)

The section of the PPP on pages 14-16 outlines a variety of tools that can be used by the BRTB for its various outreach and engagement efforts. It is not a listing of policies. Page 10, bullet 6 references the BRTB's policy for holding meetings at various times, including evenings and weekends. This policy has been in effect for years and most of the BRTB's public meetings occur on weekdays between 4 and 8 p.m. A majority of special events and outreach have been held on weekends.

We agree that it is important to acknowledge the importance of holding meetings outside of the traditional 9-5 business hours. Therefore, we added the following clarifying language to the section "Hold public meetings" on page 16: "These meetings will be held at various locations throughout the region and will be scheduled at various times, including evenings and weekends to maximize participation by a wide-range of stakeholders, including those traditionally underserved."

Hold Open Houses (p. 16) - "...staffed by knowledgeable facilitators whenever practical..." - if you cannot supply knowledgeable facilitators, you should not bother with an open house. (*b'more mobile*)

Agreed. Sentence removed.

Hold Public Meetings (p. 16) - References holding meeting when appropriate - what is appropriate, who determines it, and how? Far too often, members of the public are invited to only intermittent engagement with the planning process and after many important decisions have been made. (*b'more mobile*)

We apologize for any confusion the use of the word "appropriate" may have caused. We have removed this word on page 16. The section entitled "Public Meeting Schedule" on page 11 details the public meetings the BRTB will hold on its various plans and programs.

Regarding your concern about intermittent engagement, the BRTB strives to offer the public with a range of opportunities to comment, throughout the planning process. For example, the 18-month process to develop *Maximize2040: A Performance-Based Transportation Plan* began with a

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comment period on the goals and a launch event at the Baltimore Museum of Industry. This was followed by a "Preparing for the Future" survey, the release of Demographic and Socioeconomic Projections, and a 3-month call for public project ideas. Additional comment periods will be held in future phases of the plan development as well. All of these comment periods are promoted through public education, outreach and engagement efforts.

**Website routinely includes out of date or dead links. Review website and logs daily to ensure current info** *(J. Cutonilli)*

We are aware of these problems and are working to resolve these issues throughout the site. In addition, we will work with our web team to set a regular schedule to check for dead links and outdated information.

**BRTB produces very little visualizations of data - maps of entire region do not allow understanding of specifics (ex: Appendix E of LTRP). Provide map data in formats that allow users to zoom in and see details.** *(J. Cutonilli)*

Thank you for your feedback on this. We are continuously working to improve our communications with the public, including ease of understanding the material presented and visual display of information. For example, the BRTB recently began using info.gram to provide interactive visualizations of information and data. We are also working on updating our interactive mapping services to provide more robust data that can be viewed in an interactive fashion as you suggested.

## DOCUMENT SPECIFIC COMMENTS

**Clicking on links in PDF opens in same tab, which causes reader to lose place in document. It is better if opens in new tab.** *(K. Rylaarsdam)*

We will add a sentence to our web page about the PPP noting that "Ctrl+Click" will allow hyperlinks in the PDF to open in a new tab.

**The section on various plans (p. 8) says that a comment period of at least 30 days will be held for various plans. However, when clicking on these links it either doesn't say when a comment period will be held or for *Maximize2040* it says it was already held. Dates (tentative or actual) for comment periods should be clearly listed at the top of these pages.** *(K. Rylaarsdam)*

We apologize for any confusion. The list on page 8 is a list of plans and programs the BRTB will conduct comment periods on now and in the future. We will update the text on these pages of our website to clarify the actual/tentative dates for comment periods.

In addition, we will work with our Public Advisory Committee to create some graphics that show typical plans and a general schedule for development, as well as a *Guide to Transportation Planning*.

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**P. 13 Forgot to include 7<sup>th</sup> population of low-literacy? (*b'more mobile*)**

The VPI does not address low-literacy.

**Document doesn't list committees of BRTB or committee membership (*J. Cutonilli*)**

Feedback on the previous document was that it was too long. In addition, committee members and meeting times change so the most up-to-date information is available on the BMC website or by contacting the public involvement coordinator.

We will work with our Public Advisory Committee develop a *Guide to Transportation Planning* to address this and other comments about background info and the process.

**Unclear if responding to a tweet on a BMC account or responding to an email from Monica Haines Benkhedda will qualify with interaction with the BRTB (*J. Cutonilli*)**

The policy for submitting comments via email and social media is stated on page 8 "How to Submit Comments."

**Plan doesn't describe/visualize how regional process fits in with state process (*J. Cutonilli*)**

The BRTB would like to work with the Public Advisory Committee to develop a *Guide to Transportation Planning* to address this and other comments about background info and the process.

**Additional resources doesn't include any actual legislation. Provide this info. (*J. Cutonilli*)**

Feedback on the previous document was that it was too long. Summary information of regulations related to public involvement is on p. 20.

In addition, a new transportation bill is under consideration in congress and the Public Advisory Committee advised not to include reference to specific federal legislation (i.e. MAP-21, SAFETEA-LU, etc.) as it may become out of date before publication.

## SUPPORTIVE COMMENTS

**Outstanding! (*Judy Rose*)**

We applaud your efforts which make it possible for commuters throughout the region to have a voice and be a part of the process. - Steven Overbay, CSSC

Thank you both for your support of this plan and for taking the time to review and send comments!