

**Central Lane Metropolitan Planning Organization**  
**Draft Public Participation Plan**  
**Comments and Response Summary**  
December 7, 2006

This document summarizes and responds to comment received on the Draft Public Participation Plan. Part 1 deals with public comment, Part 2 deals with agency comment, and Part 3 deals with staff comment.

Part 1 summarizes and responds to the 4 public comments received via email during the public comment period from July 13, 2006 through August 31, 2006, and the 1 public comment received at the public hearing held October 12, 2006, before the Metropolitan Policy Committee and the Citizen Advisory Committee. This part summarizes the comments received and presents draft staff responses to the comments along with discussion as needed. Comments quoted directly have quotation marks. The source of the comment is noted in (parenthesis).

Part 2 summarizes and responds to comments received from the Federal Highway Administration.

Part 3 summarizes the changes recommended as a result of staff review of the Draft Plan, including the Transportation Planning Committee.

All the proposed changes are shown in legislative format in the Draft Plan, Attachment 2, with the exception of those marked with an \*.

## **PART 1. PUBLIC COMMENTS**

### **PUBLIC COMMENT 1 (Charles Biggs)**

Require the maximum amount of public participation rather than the minimum. Use the IAP2 (International Association of Public Participation) model and train staff in how to use it properly.

#### **Response**

- *Add "Public Comment Period" to the core public involvement tools required for the Unified Planning Work Program in Table 2, Evaluating Public Involvement Tools, page 17.*
- *Include the IAP2 Public Participation Spectrum in Appendix 2 to provide a framework for designing the public outreach strategy for a specific update of key MPO products. Add a reference to the spectrum in the Draft Plan on page 11.\**

#### **Discussion**

The Citizen Advisory Committee recommended the core public involvement tools for each key MPO product (listed in Table 1, Summary Table of Public Involvement, on page13) taking into account the nature of the document and its primary audience of federal regulators. The Draft Plan indicates that a public outreach strategy will be designed for the update of each key MPO product, drawing from the public

involvement tools listed in Appendix 2. The specific public outreach strategy will include details, such as location and timing, as well as any additional tools as appropriate and affordable. The public outreach strategy will be tailored to the unique aspects of the process depending on geographic scope, type of projects included, characteristics of affected communities, and the level of public interest. The lead staff person for the MPO Citizen Advisory Committee is a member of the International Association of Public Participation, pursuing training to obtain the certification which that organization offers, and familiar with the Public Participation Spectrum.

**PUBLIC COMMENT 2 (Linda Swisher)**

“Are these documents available for public examination at the Eugene public libraries? I cannot access them otherwise.

**Response**

*Review copies of the Draft Plan were placed in the Eugene and Springfield libraries, the Springfield office of the Oregon Department of Transportation, LCOG offices in the Schaefer’s and Wells Fargo Buildings, the Springfield and Eugene City Manager’s Offices, and the office of the Lane County Board of Commissioners.*

**PUBLIC COMMENT 3 (Rob Zako)**

3-1 The following statement on the top of page 5 in the Draft Plan is wrong and should be corrected. The Central Lane MPO transportation system planning process is subject to such state requirements.

“While the MPO transportation system planning process is not subject to the requirements of the statewide land use planning system, it is consistent with those requirements.”

**Response**

*Add language on page 5 that explains that there is a lack of clarity about the relationship between MPO transportation planning and statewide land use planning. Clarify that the federal MPO process does not apply statewide or local land use goals, provisions or regulations, nor does the federal process result in state land use decisions. The MPO process must be, and is, consistent with the state and local land use system.*

**Discussion**

The statement on page 5 in the Draft Plan quoted by the commenter is based upon a recent decision by the Land Use Board of Appeals regarding the Regional Transportation Plan (LUBA No. 2004-223).

3-2 Table 2, Summary Table of Public Involvement, on page 13 should be modified to call for both a public comment period and public hearing prior to adoption of the UPWP.

**Response**

*Add “Public Comment Period” to the core public involvement tools required for the Unified Planning Work Program in Table 2, Evaluating Public Involvement Tools, page 17.*

## **Discussion**

The Unified Planning Work Program directs what the Metropolitan Planning Organization must do over the federal fiscal year to maintain compliance with federal regulations. It includes a lot of detail about the specific tasks that need to be done to maintain compliance. Given the nature of the work program, a public hearing has not proven to be an effective way to collect public comment or to inform the public about the Unified Planning Work Program. Staff is willing to meet with any citizen or stakeholder about the work program. As the Metropolitan Planning Organization more effectively engages the public in learning about the overall process for regional transportation planning, citizens will be better poised to understand and comment on the Unified Planning Work Program.

- 3-3 “Measures such as the following should be added to the measures of effectiveness of the public involvement program:
1. Number of issues for which public comment resulted in a substantive change from what was originally proposed in the draft.
  2. Percentage of people who feel like their comments were heard.
  3. Anecdotal stories of cases in which members of the MPO feel like comments from the public led them to revise their views.
  4. Percentage of people attending, say, an open house who say that doing so significantly increased their understanding of whatever is at issue.
  5. Percentage of members of the public and members of the MPO who feel like meaningful two-way communication is taking place.
- More generally, the measures should be tied to specific goals, objectives or policies. The measures should either be listed along side the goals, objectives and policies, or else there should be a table that cross references which measures pertain to which goals, objectives and policies. In this way, the purpose of each measure can be made plain. Moreover, in this way it should be clear which goals, objectives and policies aren’t being measured, and thus perhaps not advanced.”

### **Response**

- *Produce a Comments and Response Summary for each key product of the Metropolitan Planning Organization as a way to allow the public to see that comments were listened to even though not all were acted upon and the reason why the Metropolitan Planning Organization disagreed with the input.*
- *Make the following changes to Table 2, Evaluating Public Involvement Tools, page 17:*
  - *Add a measurement to count the number of changes in a draft document that resulted from public comment received.*
  - *Add a measurement to collect feedback by surveying attendees of public outreach events regarding whether and how their understanding of the issue had been increased.*
  - *Reference the relevant objective from Chapter II of the Draft Plan for each evaluation measurement.*

## **Discussion**

The Citizen Advisory Committee extensively and thoughtfully discussed this public comment regarding qualitative measurements and agreed on the response at their November 1, 2006, meeting. They recommended adding the measurement to collect feedback as a workable way to collect qualitative input. The committee's discussion reflected an understanding of the desire to measure whether any public input created change or had an impact. Their response considered the challenge of determining whether input was valid or substantive and noted that when a large number of people testified against a project but the project was still approved it was difficult to avoid the perception that input was ineffective. One member summed up this situation by reflecting "...some issues could not be solved at the public involvement level and ultimately those who were elected would make the decisions." (Quoted from the November 1, 2006, minutes of the Citizen Advisory Committee)

- 3-4 "With the specific changes we recommend, we urge the Central Lane MPO to adopt this plan and to put it into effect. But given concerns about the effectiveness of public involvement, we recommend that the Citizen Advisory Committee review the effectiveness of the plan within one year of adoption and prepare a report with recommendations."

### **Response**

*No change recommended.*

### **Discussion**

The Draft Plan on page 15 provides for the Public Participation Plan to be reviewed annually using the measures of effectiveness in the Plan.

## **PUBLIC COMMENT 4 (Rob Handy)**

This summary addresses both the comment submitted by email during the public comment period and the testimony at the public hearing.

- 4-1 The commenter expressed support for the comments expressed by Rob Zako.

### **Response**

*No additional response needed, refer to the response to Rob Zako's comments.*

- 4-2 Take a thorough look at the public process used by the Army Corps of Engineers at their June 29, 2006, Public Meeting, including contacting the facilitator to learn why and how the Army Corps crafted a format that had such unusual and effective interaction with all interested parties.

### **Response**

*Include in Appendix 2, Public Involvement Tools, a description of the type of public meeting used recently by the Army Corps of Engineers on June 29, 2006, concerning a permit application for building homes near the West Eugene Wetlands.\**

## PART 2. AGENCY COMMENTS

### AGENCY COMMENT 1 (Satvinder Sandhu, Federal Highway Administration)

- 1-1 Include the make-up of the Citizen Advisory Committee and address how it meets the requirement of SAFETEA-LU (the current Federal Transportation Act) that the Public Participation Plan shall be developed in consultation with all interested parties and public listed on page 5 of the Draft Plan.

**Response**

- *Add more detail in Chapter I about the composition of the Citizen Advisory Committee, such as the targeted interest groups listed in the bylaws.*
- *Explain in Chapter I the composition of the email distribution lists used for notice.*
- *Add a policy in Chapter II indicating that the MPO will seek participation and comment from all segments of the public, which references the specific language about this in SAFETEA-LU.*

- 1-2 The document does not clearly guide the public for participation opportunities and means of communication for various planning documents.

**Response**

- *Add a Note To The Reader at the front of the document telling where to learn about how to get involved.*
- *Emphasize in Chapter III of the Draft Plan that a separate document called the Citizen's Guide is being prepared. The Citizen's Guide is envisioned as the key outreach tool to tell the general public about MPO transportation planning and let them know how to get involved. Clearly explain the difference between the Citizen's Guide and the Public Participation Plan, whose purpose is to demonstrate that the MPO is meeting minimum federal requirements for the key MPO products. The Metropolitan Policy Committee agreed to the concepts for and intended use of the Draft Plan and the Citizen's Guide, which were recommended by the Citizen Advisory Committee.*
- *Add contact information for MPO partners.\**

- 1-3 Do you intend to develop the specific public outreach strategy for the update of each key work product in consultation with interested parties and make it available for 45-day public comment period?

**Response**

*No. The specific public outreach strategy for each key MPO product will be developed within the framework of the adopted Public Participation Plan and with the involvement of the Citizen Advisory Committee.*

- 1-4 Provide additional information that encourages public participation in the development of the planning and programming documents.

**Response**

- *Emphasize in Chapter III of the Draft Plan that a separate document called the Citizen's Guide is being prepared. The Citizen's Guide is envisioned as the key outreach tool to tell the general public about MPO transportation planning and let them know how to get involved. Clearly explain the difference between the Citizen's Guide and the Public Participation Plan, whose purpose is to demonstrate that the MPO is meeting minimum federal requirements for the key MPO products. The Metropolitan Policy Committee agreed to the concepts for and intended use of the Draft Plan and the Citizen's Guide, which were recommended by the Citizen Advisory Committee.*

1-5 "The policies outlining annual evaluation and review of the Public Participation Plan to improve public participation show a strong commitment from MPO to invite public participation in the development of planning and programming documents. That is greatly commended."

**Response**

*No response needed.*

**PART 3. STAFF COMMENTS**

- Add policies in Chapter II to reflect these modeled after the Salem-Keizer Area Transportation Study (SKATS) Draft Public Participation Plan. The Citizen Advisory Committee discussed this proposed change at their November 1, 2006 meeting and agreed to add the suggested polices on page 10 as items a through g under Policy 3.3 on page10.
- Add emphasis to the language in Chapter III that explains how a public outreach strategy will be tailored for the update of each key product with Citizen Advisory Committee involvement.
- Clarify that the charge of the Citizen Advisory Committee does not include involvement in products such as the TravelSmart Plan and jurisdiction-specific products.
- Add language about the budget process for both the core public involvement listed in the Summary Table and public outreach strategies tailored for the update of each key product in Chapter III.\*
- Make changes to the Summary Table, page 13, in response to MPC discussion:
  - Add Surface Transportation Program-Urban (STP-U) Fund Allocation as a key product. (note: the core public involvement tools for this MPO product will be proposed after discussion by the Citizen Advisory Committee, Transportation Planning Committee, and Metropolitan Policy Committee)

- Correct the number of Metropolitan Transportation Improvement Program (MTIP) amendments and adopted every 4 years.
  - Change the format to make it easier to find the information on updates and amendments to the key products.
  - Correct the information about the Air Quality Conformity to show that it is required for updates and significant amendments.
- Make changes to Table 2, Evaluating Public Involvement Tools, page 17, to add more evaluation measurements, such as the number of buses that displayed interior bus posters.
  - Add a page before the beginning of the document titled “Timeline for Review and Adoption of the Public Participation Plan” that lists the dates of key public outreach activities leading up to adoption, such as the public comment period, public hearing, review and adoption by the Metropolitan Policy Committee, recommendations by the Transportation Planning Committee and the Citizen Advisory Committee, and so forth.
  - Make minor edits to the draft throughout to make corrections on: page 1, 4<sup>th</sup> paragraph; page 3, 2<sup>nd</sup> paragraph; page 3, last paragraph; references to Appendices 1 – 3, throughout document; page 11, first paragraph; and page 14, first paragraph.