

MBTA PUBLIC ENGAGEMENT PLAN

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Executive Summary

The Massachusetts Bay Transportation Authority (MBTA) believes that engaging the public in the development and improvement of transit infrastructure and planning is critical to responding to the evolving needs of the Commonwealth. Ensuring the civil rights of members of the public to participate in and influence transportation decisions is essential to the mission of the MBTA.

In order to put our values into practice, we are developing a Public Engagement Plan which seeks to outline: why engaging the public is important; the principles for how we will reach out to the public; our goals for responsible and thoughtful outreach; the methods and types of community events for the public; and our responsibility to ensure access and accommodations so all may participate. This Plan, at a high level, also seeks to explain what kinds of processes, projects and decisions the public may influence through their engagement and our responsibility in that process.¹

In addition to clarifying our goals, principles and strategy for the public, this document is also part of our commitment to ensure the civil rights² of the public. Going back decades, certain populations' interests have been under-represented and not prioritized. This Plan represents our proactive course correction to that historical reality. We wish to hear from historically disadvantaged populations, including but not limited to low-income individuals, people of color and backgrounds the elderly, the disabled, those with Limited English Proficiency, veterans, non US-citizens and the LGBTQ community.

The MBTA is seeking feedback from the public about this plan and our process. After we have received your comments and suggestions we will finalize this draft and share it with the community. We look forward to your continued participation in transit development from planning, design, and construction, to service planning and policy.

Steve Poftak
General Manager
MBTA

¹ In addition, we seek to align our daily practices to the *Boston Region Metropolitan Planning Organization* revised in 2019, which can be found [here](#).

² Federal Transit Authority has issued guidance on inclusive public participation, available at FTA Circular 4702.1B, *Title VI Requirements and Guidelines for Federal Transit Administration Recipients*, at Chapter 3-5.

Background on the MBTA

The Massachusetts Bay Transportation Authority (MBTA) is the country's 5th largest transit agency and the largest transit system in Massachusetts. The MBTA is responsible for multi-modal transit operations within Greater Boston, including the provision of commuter rail service that extends into 170 communities.³ On July 17, 2015, Governor Charlie Baker appointed a five-member Fiscal Management and Control Board (FMCB) to bring oversight, support, and fiscal accountability to the Authority. The FMCB is directed to guide the MBTA in modernizing its infrastructure and providing accountability to deliver a high-quality transit system.

The MBTA's General Manager, Deputy General Manager and Chief Administrative Officer report regularly to the FMCB on the current state of the system performance, operation, finances, and Authority initiatives. In addition, the public is invited to comment on topics on the agenda at most FMCB meetings. The FMCB governance structure has been extended until June 30, 2020.

Public Engagement at the MBTA

To ensure inclusive and accessible public engagement processes for transportation decision making, and in accordance with state and federal law, the MBTA has developed this Public Engagement Plan (PEP or Plan). This Plan will be updated on a regular basis to incorporate changes in public engagement at the Authority.

This document outlines MBTA commitments to public engagement. It is important to develop strategies for engaging with those communities that may have been underserved by the public transit system or historically have lacked access to the decision-making process. This Plan presupposes a desire to have early, continuous, and meaningful opportunities for the public to help identify social, economic, and environmental impacts of proposed transit policies, projects and initiatives.

In addition, the MBTA is required to follow Federal nondiscrimination obligations, through Title VI of the Civil Rights Act of 1964, Section 504 and 508 of the Rehabilitation Act of 1973, and the Americans with Disabilities Act (ADA), and will not discriminate on the basis of race, color, national origin (including limited English proficiency), or disability. Moreover federal law, bars discrimination the basis of age, sex, and sexual orientation.

³ MBTA public website is available at: www.mbta.com

The MBTA has also redoubled its commitments to accessibility for persons with disabilities. Following the issuance of the 2018 Amended settlement agreement *Deniels-Finegold et al vs. MBTA*,⁴ the MBTA is committed to ensuring any proposed service changes include specific outreach to persons with disabilities.

This Plan provides a baseline for holding inclusive, accessible, and responsive public meetings, hearings, and other forms of participation. This Plan has been written to ensure that sufficient consideration of outreach to and inclusion of these protected groups is incorporated into the MBTA's public engagement procedures. Adherences to these principles will ensure compliance with state-level nondiscrimination obligations,⁵ which expand protections for some protected groups against discrimination based, such as sexual orientation and veteran status.

Guiding Principles for Public Engagement

Transit decision-making and project development processes need to offer the public opportunities to participate in discussions and offer opinions prior to final decision-making. The MBTA has the following public engagement principles that agency representatives and those working in concert with the MBTA on transportation projects and initiatives will strive to achieve:

- **Strong Community Partnerships:** The MBTA shall develop avenues for regular communication to build trust with communities. Quality public engagement is evident in strong community partnerships and consistent commitment to on-going engagement.
- **Strategic Outreach to Engage the Public:** Concerted effort must be given to encouraging participation through early, accessible, and strategic outreach to the public we serve.
- **Inclusive, Diverse, and Accessible Environments:** All public participation and engagement activities should promote diversity and accessibility in our processes. Every effort should be made to ensure that participation opportunities are physically, geographically, temporally, linguistically, and culturally accessible. Public engagement processes should include, as appropriate to a project or those impacted, a range of socioeconomic, ethnic, and cultural perspectives and include people from low-income, environmental justice (EJ), and minority neighborhoods, people with limited English proficiency, people with disabilities, and other traditionally underserved communities.

⁴ For more on this history, see <https://www.mbta.com/accessibility/history>

⁵ State level protections include the federal protections plus ethnicity, sexual orientation, gender identity or expression, religion, creed, ancestry, and veteran's status (including Vietnam-era veterans).

- **Respectful and Solution-Oriented Dialogue:** Community events should be welcoming to all opinions and dialogue should be based on respect and inclusion of all points of view. When there are conflicting opinions, conversations should be structured to allow for compromise while staying solution-focused to respond to community concerns.
- **Transparent Process:** Since there are many reasons to engage with the public, it is imperative that there is clarity about the process, level of input, and decision-making for any event or community process. The MBTA is open to receiving and incorporating feedback and providing appropriate opportunities for feedback. Plans and projects must be clearly framed so the potential effect may be understood by the participants. People who take the time to participate must feel it is worth the effort to join the discussion and understand the influence they can have on decisions.

Responsible & Conscious Outreach

The MBTA should understand the full range of a community's needs in order to create responsive and innovative transportation plans, projects, and policies. This entails learning about the community and their relationship to transportation and the project in question. By interacting with community members and leaders consistently, the MBTA gains insight into the reasons why community members agree or disagree with proposed plans or projects.

Historically, individuals in minority and low-income communities, as well as those with low-literacy and/or limited English proficiency, have been underserved by conventional outreach methods. Outreach to traditionally underserved groups helps ensure that all constituents have opportunities to affect the decision-making process. MBTA public outreach efforts must be designed to accommodate the needs of low-income, minority, limited English proficiency, people with disabilities, and other traditionally underserved people throughout all phases of any public engagement process. The MBTA recognizes that traditional outreach techniques are not always effective with these populations.

There is also an obligation to conduct outreach to encourage attendance, particularly among groups protected by federal and state nondiscrimination laws with which the MBTA is obligated to comply. Therefore, as much as selecting the right place, time, and location for a meeting is important, it is even more critical to make sure that as many members of the public as possible are given a chance to participate in the discussion.

To support creative public meeting planning, meetings must be tailored to effectively inform the community and/or the target audience on the subject matter to be addressed, and to respond to their questions or concerns. From a Civil Rights perspective, effective public

engagement requires knowing the target audience, including languages spoken, racial or cultural groups in the area, community organizations and leaders, and key players. Ideally, organizers would go even further and learn about the transportation or transit history for the community or any past controversies.

Strategic planning for the involvement of Title VI, low-income, disability and other protected groups is essential to an inclusive and successful effort. Anticipating this reality and taking steps to overcome barriers to participation is worth the extra effort because it ensures the potential for a project to be fully embraced by the community. Engaging the public in a targeted context is complex, especially while ensuring diverse participation, yet this work is essential to meaningfully engage with the public.

Community Events & Engagement

The MBTA will seek to engage the public about our policies, planning, and projects. The level of complexity for each project and the impact on the community will guide the structure and process of public engagement. Simple projects may require a less extensive engagement process, while some projects may require more outreach over the life of the project.

There are four major types of public engagement most commonly utilized by the MBTA: 1) Public meetings, including public hearings; 2) Open houses; 3) Stakeholder meetings, and 4) One-on-one interactions. Each of these types of events is described below along with our on-going commitment to innovate and expand options for public engagement.

1. Public Meetings, including Public Hearings

Public meetings, both at the project level and more broadly, are an opportunity for members of the public to engage in the transportation decision-making process. During public meetings, MBTA staff should present information about the project, service change, or policy update for individuals who may be less familiar with the context and answer questions.

Public hearings are a type of public meeting held with more formality and are often required by state or federal law. At a public hearing any community member has an opportunity to provide a formal public comment on the topic at hand. The MBTA records all comments in a written transcript.

2. Open Houses and Breakout Sessions

MBTA staff and consultants regularly interact with members of the public through open houses or breakout sessions. These are less formal than public meetings or hearings and provide members of the public an opportunity to view study documents or project design plans. In some cases, open house and breakout sessions occur prior to a public hearing so that the

public can be well informed in advance of the meeting. MBTA staff and consultants are on hand at these meetings to discuss particular details with members of the public. While the interactions during these sessions are informal, critical issues are often raised. MBTA staff and consultants strive to address these issues accurately and effectively during these sessions. Further, conversations with the public are documented, in order to inform study or project development.

3. Stakeholder Meetings

The MBTA is committed to engaging diverse stakeholders, both internal and external to the organization, to elicit feedback on many complex projects. In some circumstances, it may be appropriate to develop a group of stakeholders that meet regularly throughout the project process to share their specialized knowledge. At other times, it may be necessary to specifically target certain stakeholder groups. For example, a project manager overseeing the redevelopment of pedestrian pathways at a train station may benefit from specifically coordinating a meeting with disability stakeholders given the complexity and importance of that group's unique perspective on the issue.⁶ Including a diverse range of community leaders in conversations such as these is a useful strategy to solicit representative feedback.

4. One-on-One Interactions

MBTA staff members interact directly with the public by virtue of the public facing programs, services, and activities we provide. These interactions can include planned meetings and spontaneous interactions with members of the public. In these instances, MBTA staff strive to engage the public on a more personal level, while maintaining similar access and inclusion provided in more formal methods of engagement.

Beyond in-person engagement, the MBTA continually seeks additional avenues for public participation, such as through websites, live stream, mobile applications, online surveys, and social media. The MBTA hopes to use these avenues of public engagement to make participation more convenient and accessible. When considering more modern forms of public communication, the MBTA must continue to ensure that we are reaching a diverse audience and providing a meaningful opportunity to share feedback by members of the public, while guaranteeing accessible forums for participation. Keeping this priority in mind, the MBTA will

⁶ One such customer engagement group is the Riders' Transportation Access Group (R-TAG) which focuses on transportation matters that affect seniors and persons with disabilities. The group is the official advisory group to the MBTA on Accessibility matters and is comprised of a nine member Executive Board and general members.

continually innovate and strive to utilize new tools, which could increase the number of public voices in important decisions.

In addition to more formal types of public events hosted by the MBTA, there are also less formal opportunities when MBTA employees go into existing community spaces to seek public input. This could take the form of attending or presenting at existing forums, doing pop-up outreach or even intercept surveys with the public. In these cases rather than hope the community comes to our meetings, we seek to engage communities where they are and in familiar settings.

Accessibility and Public Engagement

When planning, advertising, or hosting public meetings and/or engaging with the public, MBTA staff must be sure that everyone can fully participate, regardless of minority status, income, limited English proficiency (LEP), age, disability, and geography. This requires special consideration for meeting notices, promotion, and special accommodations.

In order to ensure that members of the public are aware of outreach and engagement events, the MBTA strives to provide notice as early and broadly as possible. The MBTA aims to post notices (flyers, signage, or web pages) at least 14 days prior to a community event. While the 14 day notice is our goal, there are instances where this is not met due to the dynamic nature of transportation projects and when tradeoffs are made to immediately respond to public concerns. Notices should include information as to how the public may participate and how the MBTA will use and respond to public feedback.

There are a number of avenues utilized by the MBTA in order to ensure broad outreach so the public may participate in community events. These outreach avenues include posted signs in public locations (transit stations, bus stops, city/town halls, libraries, community bulletin boards, etc.), local newspaper notices, social media posts, distribution through the MBTA website, and through the communication networks of our community partners. Using available data, MBTA staff identify language needs of affected communities so that project information and public meeting notices are posted in those identified languages to encourage participation from traditionally underserved populations. Utilizing these various communication methods is necessary to reach a broad demographic.

Early notice of a public event is also critical because it allows participants to plan for attendance. It also provides enough time for participants to request any needed accommodations, such as those related to a disability or limited English proficiency. The MBTA generally asks that these accommodations are requested at least 10 days in advance of the event in order to allow time to process the request.

When choosing the location for a community event, MBTA staff consider a number of factors to ensure that the location is easy to get to and accessible for those who wish to attend and participate. All community events should be located within a project's affected community or study area, and be accessible by public transit when available. Additionally, a meeting location will ideally provide Wi-Fi.⁷ The location must also be accessible to participants with disabilities and compliant with State and Federal accessibility regulations. In order to achieve this, the MBTA must consider several factors before choosing a meeting location.⁸ Some of these requirements include, but are not limited to:

- Accessible Parking;
- Clear Paths of Travel;
- Accessible Entrances;
- Accessible Restrooms;
- Accessible Meeting Room;
- Space for Computer Assisted Real-Time Transcription (CART);
- Space and Signage for Foreign Language Interpreters;
- Adjustable Microphones and Podiums; and
- Accessible Raised Platforms.

Beyond ensuring that a public meeting is physically accessible, other accommodations must also be considered. As mentioned above, the MBTA strives to provide additional reasonable accommodations when requested. When the public has an accessibility or language accommodation request, they can make their request through a designated MBTA contact person, which should always be listed on any community event notice or flyer. Examples of specific accommodations that can be provided to individuals in order to allow them to meaningfully participate in a community event include the following:

- Documents in Alternative Formats (large print, electronic, braille or audible);
- Translated Documents;
- Assistive Listening Devices;

⁷ Whenever possible, the MBTA should have community events in locations with Wi-Fi access for two purposes. First, technology can enable some participants to engage during the meetings when they have been unable to without the use of internet-enabled services. Second, events can be video-recorded, and when possible live-streamed, to allow people to participate even when they cannot be in the location of the event.

⁸ For more information on the MassDOT *Accessible Meeting Policy*, including a checklist of requirements, please visit: <https://www.mass.gov/lists/massdots-adasection-504-transition-plan>

- Video Remote Interpreting;
- Video and Telecommunication Voice Relay Services;
- Closed Captioning;
- Computer Assisted Real-Time Transcription (CART);
- American Sign Language (ASL) Interpreters; and
- Foreign Language Interpreters.

Planning for the language and interpretation needs of a community is important. Using available data, MBTA staff proactively identify language needs of affected communities so that project information and public meeting notices are posted in those identified languages to encourage participation from traditionally underserved groups. Additionally, the MBTA works with community partners such as elected officials and local organizations who advocate for language accommodations in their communities.

Public Engagement Regarding Fare Changes

Fare revenue makes up a significant portion of the total MBTA operating budget. In addition to state assistance, municipal assessments, and own-source revenue, fare revenue is necessary to operate the system and make capital investments to modernize transit. At times, the MBTA needs to increase fares in order to keep up with operating costs or to increase service. In addition, sometimes the MBTA changes the fare structure or adds new fare products in order to meet policy goals, like increasing ridership or shifting ridership to times or service with capacity. The MBTA recognizes that increased transportation costs have an impact on customers. The MBTA is committed to engaging our ridership in a meaningful conversation whenever we consider changing fares.

Current state law allows the MBTA to raise fares at regular, modest increments, limiting increases to once every 2 years and a cap of no more than 7% for each increase.⁹ When considering a biennial fare increase, the MBTA develops one or two scenarios and the associated revenue, ridership, and equity impacts. These scenarios are presented to the public for a comment period lasting for at least 21 days.

The MBTA sets up multiple channels for comment including online forms or emails, mailing address, and in person at public meetings. There is also an official public hearing for testimony. At any such hearing, the MBTA will make a formal presentation regarding the

⁹ As of January 1, 2017, fare increases may only take effect every two years, and not at more than 7% each increase. See *An Act Relative to MBTA Fare Increases*, 2015 Mass. HB 4492.

proposed fare changes, and the public will have the opportunity to provide testimony on the proposals for the public record.

The goal of the fare change public meetings is to discuss the proposed changes and solicit direct input from the public. This can be accomplished as standalone meetings or in combination with other related MBTA initiatives. The MBTA prioritizes meeting formats that allow the public to ask questions directly of MBTA leadership.

The number and location of the fare change public meetings depends on other ongoing MBTA initiatives, but locations will be selected to make sure communities most impacted by the changes have opportunities to comment while covering the MBTA service area. As with all public engagement, consideration and accommodation shall be made for accessible meetings and information dissemination, including meeting timing, location and language equity.

MBTA staff read all fare change public comments received and create a summary for the MBTA leadership. The summary is used to make changes or revisions to the proposed scenario(s). A revised scenario is presented to the MBTA governing board with an updated revenue, ridership, and equity analysis.

The MBTA governing board will make a final vote on the proposed fare changes after considering the overall financial condition of the MBTA, ridership, revenue, and equity implications of the changes, the staff's summary of public comments, and comments from the MBTA Advisory Board.

When the MBTA is considering major changes to the fare structure, more significant public engagement is required. Examples of changes to the fare structure are distance based or time of day pricing. These types of changes will include more types of public engagement and a longer time period to explain options and consider different scenarios. Such a process would likely include multiple stakeholder meetings, open houses, and workshops to discuss the trade-offs between policy goals. Once formal scenarios are created, the adoption process would follow a similar process to the standard fare increase public process.

Public Engagement Regarding Capital Projects

The project development process is initiated in response to an identified need in the system. Identification of this need can result from suggestions or concerns about an asset, or through corridor or area planning processes. This need identification can also occur through planning initiatives of a planning organization or arise from community, legislative, or citizen input. Public voice in lifting up needs is essential for the MBTA to continue to meet the evolving needs of the riding public.

The MBTA, in coordination with the Massachusetts Department of Transportation (MassDOT) Office of Transportation Planning, has developed a long-range investment plan to position the MBTA to meet the needs of the Greater Boston region in 2040. In developing the plan, known as Focus40,¹⁰ MBTA and MassDOT conducted significant research and public engagement to identify future needs for MBTA service. Through these initiatives, the public had the opportunity to influence what projects that the MBTA builds. Working with local MPOs or other planning agencies, and directly with the MBTA/MassDOT on our long range planning, is the best way to identify future transportation needs and get projects into the pipeline. Identified needs, ultimately develop into projects contained in the five-year Capital Investment Plan (CIP).¹¹

Once a project is prioritized through the CIP process for funding, individual project planning and design begins. During the planning phase, issues, impacts, and potential required approvals are identified in order to determine which design and permitting processes are applicable. Public engagement in a project should begin early in project planning and before there is a recommended course of action. For major projects, the initial public engagement process should start before design and continue at critical milestones throughout the planning process.

Public meetings are conducted during the planning phase in order to relay information to the general public and to solicit input to the project. The public meetings serve as forums at which the MBTA can learn about and respond to community concerns. Some projects, particularly those related to system maintenance and asset improvement, may not necessitate public engagement. However, progress on those initiatives should be reported out to the public regularly.

After a construction contract is awarded, a construction management plan should be developed. The permitting agencies, local authorities, businesses, and affected members of the general public need to be informed of changes in detours, traffic operations, and construction areas and activities occurring throughout the project.

Before construction activities begin, the project managers shall determine the appropriate type of public notification and participation needed. Projects result in different types of disruption to transportation and other nearby activities. For simple projects, a minimal degree

¹⁰ The MBTA's long range investment plan, Focus40, can be found online here: <https://www.mbtafocus40.com/>

¹¹ Capital Investment Plan can be found here: <https://www.mass.gov/service-details/capital-investment-plan-cip>

of public engagement may be needed. For these projects, the project owner should, at a minimum, notify abutters (in languages other than English, if appropriate) of the impending construction activity. For more complex projects, more public engagement may be needed. Monthly or quarterly stakeholder and abutter meetings may be held when the size or location of a project calls for them. In addition, the MBTA will utilize the following communication tools to share project information and receive feedback:

- MBTA website;
- Media outlets, both print and TV;
- Social media tools; and
- Public Affairs email account.

While the depth of public engagement does depend on the size, scope and complexity of a project, the MBTA values consistent and regular communication with the public, along with opportunities for the public to share their feedback at regular intervals.

Public Engagement Regarding Service Planning & Service Changes

The MBTA has set service objectives and standards for all MBTA services.¹² In order to meet these stated goals, and accommodate changing travel behaviors in the region, the MBTA regularly evaluates performance of its services and recommends service changes through the service planning process. The service planning process includes system-wide quarterly changes, ongoing rolling Service Plan changes, and an annual evaluation to inform the MBTA's budget process.

Service changes can be proposed by MBTA staff or leadership, as well as members of the public, including municipalities, organizations, and customers. The common ways for the public to submit comments for a service change are through public meetings or workshops, written correspondence, the MBTA website, the MBTA customer call center, email, and Twitter. Municipalities can also submit service ideas for the MBTA to pilot through our Service Pilot process.¹³

Regardless of how Service Planning ideas are initiated, any significant change that the MBTA makes to its service will impact customers. Therefore, the MBTA must engage the public to ensure that the benefits of the proposed changes outweigh any potential downsides. Public

¹² The MBTA's Service Delivery Policy can be found online at <https://www.mbta.com/policies>.

¹³ More information about the MBTA Service Pilot Process can be found online at <https://www.mbta.com/policies/service-pilot-process>.

engagement is always required for a Service Plan. In addition, significant changes, such as route elimination, require public engagement regardless of when the change takes place.

The MBTA provides avenues for ongoing communication through its website, customer phone line, social media outlets, standing committees, and comments sent to individual MBTA employees. Service-related comments and requests are directed to the appropriate department for consideration and response. Upon request, MBTA staff will also consider attending public meetings held by municipalities or with public officials to address specific service issues. From time to time, the MBTA may conduct specific market or route-based meetings to gather direct feedback on potential service changes. This ongoing public outreach informs both the quarterly service planning process and the Service Plan process.

Once a Preliminary Service Plan is developed, the MBTA schedules one or more public meetings in appropriate locations. At these open meetings, the MBTA presents the analysis and tradeoffs behind the proposed service changes and solicits public comments on them. MBTA staff then reviews the suggestions made through public comments and considers them before presenting the final recommendations to the Board for approval. All public meetings relating to Service Planning will follow the public meeting values and principles outlined in this document.

Public Engagement in Policy Development

The MBTA develops policies to guide our decision-making in a transparent manner and inform members of the public and stakeholders what they should expect.¹⁴ Some policies, like those relating to Civil Rights and Title VI, are federally required. Policies like these require formal public engagement and will follow the standards outlined in this Public Engagement Plan. Other policies, like our Service Pilot Policy or Service Delivery Policy, are not federally required. Even so, the MBTA is committed to engaging our customers on issues important to the riding public. Therefore, policies like these are crafted based on input the MBTA has received through ongoing public dialogue. Customers who are potentially impacted by changes in policy will be engaged, as appropriate.

Closing

The MBTA is committed to doing our part in improving the Commonwealth's transportation system. Meaningful, continuous, and accessible public engagement are critical components of doing so efficiently and successfully. By utilizing the strategies and methods set forth in this document, the MBTA is confident that together, we can enhance how we move.

¹⁴ MBTA policies can be found online here: <https://www.mbta.com/policies>