

The Des Moines Area MPO is collecting public feedback on draft updates to its Public Participation Plan and Language Assistance Plan through Thursday, April 15, 2021. The initial deadline of March 31 was extended 15 days, per direction from the Iowa Department of Transportation. To date, comments have been received from one Des Moines resident, one MPO member government representative, and the Iowa DOT. Those comments follow.

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I offer the following feedback on the proposed MPO Public Participation Plan 2021 Update, dated March 2021 available at: <https://dmampo.org/wp-content/uploads/2021/02/MPO-Public-Participation-Plan-2021-Update-REVIEW-DRAFT-.pdf>

On Page 16 where the public participation procedures are outlined, I would suggest including posting a notice on the DMAMPO website and other DMAMPO social Media outlets capable of posting news and calendar events notices for public meetings and opportunities to provide public input. I would suggest the MPO could post event/calendar information on respective MPO online sites at the same time the MPO provides legal publication.

Also on page 16, various activities include "legal notice published one week prior to public meeting". Could you specify in what publication the legal notice will be published in the PPP?

I would suggest the MPO consider adding some sort of subscription for notices of upcoming events/meetings, such as some sort of e-mail sign-up or e-mail lists the MPO maintains and uses to communicate updates and upcoming events to stakeholders and interested parties.

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Here are my comments on the [draft PPP](#).

- First, on page 17 under Public Participation Procedures for the PPP document, it notes a 30-calendar day public comment and review period. Please change this to 45 calendar days. 2 CFR 450.316(a)(3) states "A minimum public comment period of 45 calendar days shall be provided before the initial or revised participation plan is adopted by the MPO. Copies of the approved participation plan shall be provided to the FHWA and the FTA for informational purposes and shall be posted on the World Wide Web, to the maximum extent possible."
  - Was there a notice issued for public comment on the draft PPP, and if so, when was it released?
  - Was there a minimum of 45 calendar days provided for public comment? If not, you may want to extend the deadline or redo the public comment period in order to meet the federal requirements.
- On page 3, third paragraph, first sentence – "The MPO developed this PPP in consultation with the public and other interested parties." This is federal requirement 23 CFR 450.316(a)(1) and the draft does discuss the Stakeholders and public groups as well as outreach strategies. You

may want to insert a section describing the extent to which the MPP developed this PPP in consultation with those stakeholders, public groups and what outreach strategies were used.

- Once the PPP is final, please provide an electronic copy to me, Andy Loonan, Darla Hugaboom (FHWA), and Gerri Doyle (FTA)
- The first bullet for each of the planning document/activities starting on page 16 appear to be the description of the planning document. These descriptions are lacking...description. If I was Joe Q. Public, these descriptions are not explaining what these documents/activities are about. Please expand on the descriptions.
  - For instance, if you were to describe the LRTP to someone, is that how you would describe it? The CFR definition, as an example, for the metropolitan transportation plan states “the official multimodal transportation plan addressing no less than a 20-year planning horizon that the MPO develops, adopts, and updates through the metropolitan transportation planning process.” Key descriptive differences here are multimodal and 20-year planning horizon but I do think you should keep the part about it being fiscally-constrained.
- For update frequency, or required timeline for documents – Please add this information to TIP Revisions (Revisions occur as needed), LRTP Amendments (Amendments occur as needed) and PPP (Updated every five years or as needed.)
- In the PPP guidelines, it notes to include “how the draft document is developed, including how stakeholder and public input is sought, such as through public meetings, surveys, or other means.” This information does not come across very well in the public participation procedures for each document. Please describe the development process and review process of the federal, state, and public.
  - For instance, if the document was the UPWP:
    - Development process – This could be... MPO staff evaluates its planning funding availability and regional planning tasks/needs with MPO committees and members to advance a draft UPWP.
    - Review process of federal, state, and public – This could be...Iowa DOT, FHWA, and FTA review the draft UPWP for compliance with requirements and regulations. Public and stakeholder review is not required for the UPWP.
- In the PPP guidelines, it notes to include “The minimum length of public comment period for the draft document (if applicable) and how public input is reviewed and incorporated.” Most information in sections starting on page 16 include a minimum length of public comment but more detail could be provided about how public input/comment is sought after, reviewed, and incorporated.
  - For instance, if the document was the UPWP:
    - Public input procedures– This could be... Public input/comment is not required for the UPWP.
- In the PPP guidelines, it notes to include “How adoption occurs.”
  - For instance, if the document was the UPWP:
    - Adoption process – This could be ...The MPO Policy Board adopts the Final UPWP after considering/incorporating state and federal comments. FHWA and FTA approve the Final UPWP.
- In the PPP guidelines, it notes to include “Where final products are available.”
  - For instance, if the document was the UPWP:
    - This could be ...The UPWP can be found at URL.

- In the PPP guidelines, it notes to include “Revision procedures, such as for amendments and administrative modifications. Some have this information but the UPWP element does not, even though it can be revised and amended.
  - For instance, if the document was the UPWP:
    - Revision/amendment process – This could be...MPO staff works with members, state and federal governments to monitor the UPWP implementation and process modifications and amendments as needed. Specific revision and amendment requirements can be found in the UPWP.
- The draft PPP does discuss employing visualization techniques, such as large maps. Does the MPO also provide an alternative way to visualize information for people who cannot see certain colors? This could be making sure any color variation can also be perceived in grayscale format and color-coded lines can also be differentiated by patterns stamped onto each line such as squares and triangles, or varying levels of thickness.
- In the PPP, it lists the MPOs various Roundtable + Working Groups. Has the MPO thought about creating an Equity/Diversity Roundtable of individuals that can represent the seven degrees of disadvantage? For instance, a representative that could best represent LEPers, non-whites, people in poverty, carless households, persons with disability, single heads of households, older adults, etc? I think the PCCCB and AALF mentioned on page 11 would be good representatives. Also, this would provide these individuals with an opportunity to have a role in MPO transportation planning, as much as any roundtable or working group currently have. It might also make your distribution of material, notices, news, etc. more accessible to those disadvantaged populations.
  - I would encourage the MPO to consider adding those areas that ACS identifies as having no internet access or low computer and low internet access (technology deserts) to the seven degrees.
- On page 12, when it says media releases go to media outlets including those with LEP and minority audiences, are the media releases provided to those media outlets already translated?
- Does the MPO have a Facebook and Twitter account? If so, you may want to follow these organizations as it may return a follow. Consider adding followers from the disadvantaged groups, if you are not currently, to your social media accounts to help deliver your messages and content.
- On March 8, a press release was issued asking for the public to help decide local transportation projects. Does this media release meet your draft public participation plan, Title VI, and LEP requirements? I notice that on this press release (and even the meeting agendas – didn’t find any meeting notices on your website) that there is not a note that the meetings are open to all individuals and that if any person should need to request a reasonable accommodation to participate, they can contact such and such at this or that.
  - I notice at the bottom of the Policy Committee webpage, the following statement:
 

“Anyone planning to attend MPO meetings who may need auxiliary aids or services should contact the Des Moines Area MPO office at (515) 334-0075. Please contact us at least 48 hours in advance so that appropriate arrangements can be made.”
  - This would be good information to include on meeting agendas and in press releases.
- This media release directs individuals to an interactive map. How would you accommodate a person who lived in an area of the metro that has no internet access or low computer and low internet access? For instance, if someone was to contact you with this disadvantage, how would the MPO try to accommodate that person so they could submit a comment on the project descriptions and view an interactive online map? Something to think about.

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Having the zoom link on the agendas for the full ability for the public to see the same information is important to the public interest. ... I think it is confusing and perhaps not even fully compliant without the link and without an electronic meeting statement. I would encourage having more information listed on there for the full availability for the public as there is important value in the slides. A couple of peer examples below.

WRA found [here](#).

DART found [here](#).

Des Moines found [here](#).

Pleasant Hill found [here](#).

Ankeny found [here](#).