



PUBLIC PARTICIPATION PLAN

FOR TRANSPORTATION PLANNING ACTIVITIES

UPDATED BY THE NP&EDC ON MARCH 20, 2017

**NANTUCKET PLANNING AND ECONOMIC DEVELOPMENT COMMISSION
2 FAIRGROUNDS ROAD
NANTUCKET, MA 02554
(508) 325-7587
WWW.NANTUCKET-MA.GOV**



ENDORSEMENT

**PUBLIC PARTICIPATION PLAN
FOR
TRANSPORTATION PLANNING ACTIVITIES**

Signatory Certification:

Stephanie Pollack, Secretary of Transportation
Massachusetts Department of Transportation

Date

Thomas Tinlin, Administrator
Highway Division - Massachusetts Department of Transportation

Date

Nathaniel Lowell, Chairman
Nantucket Planning and Economic Development Commission

Date

Notice of Nondiscrimination Rights and Protections to Beneficiaries

Federal “Title VI/Nondiscrimination” Protections

The Nantucket Planning and Economic Development Commission (NP&EDC) operates its programs, services, and activities in compliance with federal nondiscrimination laws including Title VI of the Civil Rights Act of 1964 (Title VI), the Civil Rights Restoration Act of 1987, and related statutes and regulations. Title VI prohibits discrimination in federally assisted programs and requires that no person in the United States of America shall, on the grounds of **race, color, or national origin** (including **limited English proficiency**), be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity receiving federal assistance. Related federal nondiscrimination laws administered by the Federal Highway Administration, the Federal Transit Administration, or both prohibit discrimination on the basis of **age, sex, and disability**. These protected categories are contemplated within the NP&EDC’s Title VI Programs consistent with federal interpretation and administration. Additionally, the NP&EDC provides meaningful access to its programs, services, and activities to individuals with limited English proficiency, in compliance with US Department of Transportation policy and guidance on federal Executive Order 13166.

State Nondiscrimination Protections

The NP&EDC also complies with the Massachusetts Public Accommodation Law, M.G.L. c 272 §§ 92a, 98, 98a, prohibiting making any distinction, discrimination, or restriction in admission to or treatment in a place of public accommodation based on **race, color, religious creed, national origin, sex, sexual orientation, disability, or ancestry**. Likewise, the NP&EDC complies with the Governor’s Executive Order 526, section 4 requiring all programs, activities, and services provided, performed, licensed, chartered, funded, regulated, or contracted for by the state shall be conducted without unlawful discrimination based on **race, color, age, gender, ethnicity, sexual orientation, gender identity or expression,**

religion, creed, ancestry, national origin, disability, veteran's status (including Vietnam-era veterans), or **background**.

Additional Information

To request additional information regarding Title VI and related federal and state nondiscrimination obligations, please contact:

Andrew Vorce, Director of
Planning
Nantucket Planning and
Economic Development
Commission
2 Fairgrounds Road
Nantucket, MA 02554
508-325-7587
avorce@nantucket-ma.gov

Title VI Specialist
MassDOT, Office of Diversity and Civil
Rights (ODCR)
10 Park Plaza
Boston, MA 02116
857-368-8580
TTY: 857-368-0603
MASSDOT.CivilRights@state.ma.us

Complaint Filing

To file a complaint alleging a violation of Title VI or related federal nondiscrimination law, contact the Title VI Specialist (above) within 180 days of the alleged discriminatory conduct.

To file a complaint alleging a violation of the state's Public Accommodation Law, contact the Massachusetts Commission Against Discrimination within 300 days of the alleged discriminatory conduct at:

Massachusetts Commission Against Discrimination (MCAD)
One Ashburton Place, 6th Floor
Boston, MA 02109
617-994-6000
TTY: 617-994-6196

Translation

English: If this information is needed in another language, please contact the MassDOT Title VI Specialist at 857-368-8580.

Portuguese: Caso esta informação seja necessária em outro idioma, favor contar o Especialista em Título VI do MassDOT pelo telefone 857-368-8580.

Spanish: Si necesita esta información en otro idioma, por favor contacte al especialista de MassDOT del Título VI al 857-368-8580.

Chinese Simplified: (mainland & Singapore):
如果需要使用其它语言了解信息，请联系马萨诸塞州交通部（MassDOT）《民权法案》第六章专员，电话857-368-8580。

Chinese Traditional: (Hong Kong & Taiwan):
如果需要使用其它语言了解信息，請聯繫馬薩諸塞州交通部（MassDOT）《民權法案》第六章專員，電話857-368-8580。

Russian: Если Вам необходима данная информация на любом другом языке, пожалуйста, свяжитесь со специалистом по Титулу VI Департамента Транспорта штата Массачусетс (MassDOT) по тел: 857-368-8580.

Haitian Creole: Si yon moun vle genyen enfòmasyon sa yo nan yon lòt lang, tanpri kontakte Espesyalis MassDOT Title VI la nan nimewo 857-368-8580.

Vietnamese: Nếu quý vị cần thông tin này bằng tiếng khác, vui lòng liên hệ Chuyên viên Luật VI của MassDOT theo số điện thoại 857-368-8580.

French: Si vous avez besoin d'obtenir une copie de la présente dans une autre langue, veuillez contacter le spécialiste du Titre VI de MassDOT en composant le 857-368-8580.

Italian: Se ha bisogno di ricevere queste informazioni in un'altra lingua si prega di contattare lo Specialista MassDOT del Titolo VI al numero 857-368-8580.

Khmer: ប្រសិនបើលោកអ្នកត្រូវការរបកប្រែព័ត៌មាននេះ សូមទាក់ទងអ្នកឯកទេសលើជំពូកទី6 របស់ MassDot តាមរយៈលេខទូរស័ព្ទ

857-368-8580

إن كنت بحاجة إلى هذه المعلومات بلغة أخرى، يُرجى الاتصال بأخصائي الفقرة السادسة على الهاتف **Arabic: 857-368-8580**

PUBLIC PARTICIPATION PLAN FOR TRANSPORTATION PLANNING ACTIVITIES

1. Introduction

1.1 Purpose

This document outlines a strategy for collecting thoughts and questions of the public during the preparation of transportation planning documents for the Nantucket Planning and Economic Development Commission (NP&EDC). The awareness and involvement of persons interested in governmental processes are critical to successful regional transportation planning and programming. When the public is engaged in the process, its feedback helps assure projects address community needs. Likewise, the public gains a better understanding of the tradeoffs and constraints associated with transportation planning. This Public Participation Plan (PPP) serves as a guide for the NP&EDC's public involvement process as well as the continuing, comprehensive, and coordinated (3C) planning process among stakeholders to ensure the ongoing opportunity for broad based participation in the development and review of regional plans and programs.

1.2 Community Profile

Nantucket is located 25 miles off the south shore of Cape Cod in Nantucket Sound. The main island of Nantucket is approximately 45.9 square miles, and is 14 miles long and varies in width from 3 to 6 miles. Two other barrier islands, Tuckernuck and Muskeget, lie to the west of Nantucket.

Much of Nantucket's economy is income generated from tourists and other visitors, retirees, and second-home owners. Therefore, the community depends greatly upon the survival of these natural and historic resources, as well as the marine resources, to maintain the island as a premier destination. Nantucket's appeal as a year round residence is evident in the island's increasing population figures, which doubled between the 1980 and 2010 US Census from 5,087 to 10,172. And although dwellings are located throughout the island, a majority the year round population is concentrated in the central portion of the island, or "mid-island", which accounts for 55% of the year round population on 9% of the island.

The NP&EDC is committed to ensuring that no person is excluded from participation in, or denied benefits of its services on the basis of race, religion, color, age, ancestry, national origin, gender, disability, or sexual orientation as protected by Title VI of the Civil Rights Act of 1964. As part of the latest update of the NP&EDC's Regional Transportation Plan (RTP), planning staff included mapping of Title VI and Environmental Justice populations using the latest data available from the American Community Survey (ACS) for 2009-2013. Neighborhoods with high minority, limited English proficiency, low-income, and foreign-born populations have been identified with data from the American Community Survey (ACS) for 2009-2013. Other populations

have also been identified to ensure protection and prohibit discrimination or disproportionate adverse impacts based on gender, disability status, and age. The areas with higher concentrations of lower income, minority, limited English proficiency, and/or disabled populations are primarily in the mid-island and Airport area neighborhoods. These areas are also within the Town Overlay District where not only density and future growth are focused, but also transportation services and facilities, such as public transportation and multi-use paths, are available or future investments in this infrastructure is targeted.

As reflective of the seasonal tourist economy, most jobs are in the retail and service sectors. A large portion of the employment is also in construction and manufacturing, which is indicative of the growth the island experienced in the last 30 years. Transportation plays a critical role in the local economy. It is important that the island maintain the natural and historic qualities while providing a safe and efficient means for visitors and residents to travel to and around the island. Traffic gridlock threatens Nantucket's aesthetics and character, as do contemporary solutions to traffic problems.

Outreach to all user groups, including protected and workforce populations, is primarily accomplished through the notification to and participation of identified transportation stakeholders, who are listed in Section 2.2.5. This includes sending email notifications of scheduled meetings or events to the identified contacts that provide or oversee public services or represent public committees and agencies charged with either providing transportation services or advocating for Title VI protected populations, such as the elderly and disabled, or economically disadvantaged populations.

1.3 NP&EDC Authority

The NP&EDC serves as one of the Commonwealth of Massachusetts' thirteen Regional Planning Agencies. Ten of these agencies are federally designated Metropolitan Planning Organizations (MPO). Federal regulations require that an MPO be formed in urbanized areas with a population of 50,000 or more. While the Nantucket region (as well as the Martha's Vineyard region) do not meet these criteria, the Massachusetts Department of Transportation (MassDOT) provides funds for transportation planning in these regions, essentially treating them as MPOs.

The Nantucket MPO is a decision making body consisting of MassDOT, and the NP&EDC. For the purpose of this document, the Committee of Signatories will be referred to as the Nantucket MPO. In this role the NP&EDC follows federal transportation planning regulations, including the participation of citizen advisory groups in transportation planning activities..

The NP&EDC is charged with planning for the “orderly and coordinated development and protection of the physical, social and economic resources for the Island of Nantucket” (Mass. General Law, Chapter 561 of the Acts of 1973, “An Act Establishing the Nantucket Planning & Economic Development Commission”). The NP&EDC consists of twelve members:

- 5 elected members of the Nantucket Planning Board,
- 1 member appointed by the Conservation Commission,
- 1 member appointed by the County Commissioners,
- 1 member appointed by the Housing Authority,
- 1 Director of the Department of Public Works as an ex-officio member, and
- 3 at-large members appointed by the NP&EDC.

1.4 Legislative Mandate

The Federal Aid Highway Act of 1962 passed by Congress made transportation planning a condition for receipt of federal highway funds. This legislation encouraged “a *Continuing, Comprehensive* transportation planning process carried on *Cooperatively* by the states and local communities”, known as the “3-C” planning process. An array of subsequent and current highway bills further increased the need for the transportation planning process. These bills were/are:

- Federal Highway Act of 1970
- FHWA/Urban Mass Transportation Administration Joint Regulations (UMTA) (1975)
- Federal Aid Highway Act of 1982
- Revised FHWA/UMTA Joint Regulations (1983)
- Intermodal Surface Transportation Efficiency Act of 1991 (ISTEA)
- Transportation Equity Act of the 21st Century (TEA-21) 1998
- Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users (SAFETEA-LU) 2005
 - As part of the Federal SAFETEA-LU transportation bill all MPOs must develop a **Public Participation Plan** in consultation with affected agencies and groups that the plan is intended to reach.
- Moving Ahead for Progress in the 21st Century Act (MAP-21) 2012
 - MAP-21 requires the Metropolitan Planning Organizations (MPOs) to provide for consideration of projects and strategies that will serve to implement six (6) transportation planning factors as follows:
 - *Strengthens America’s Highways*
 - *Establishes a Performance-Based Program*
 - *Creates Jobs and Supports Economic Growth*
 - *Supports the Department of Transportation’s (DOT) Aggressive Safety Goals*
 - *Streamlines Federal Highway Transportation Programs*
- Accelerates Project Delivery and Promotes Innovation Fixing America’s Surface Transportation Act (FAST) – 2015
 - This bill establishes a new National Highway Freight Program
 - MPOs must provide for the development and integrated management of “intermodal facilities that support intercity transportation, including intercity buses and intercity bus facilities, and commuter van providers.”

- Public Transit representatives shall have same authority as other MPO committee members
- MPOs are encouraged to consult with State agencies that plan for tourism and natural disaster reduction
- New planning factors: system resiliency and reduce/mitigate stormwater impact on surface transportation and
- MPO Plans shall identify public transportation facilities and intercity bus facilities

1.5 Update of the Public Participation Plan

The update of this plan began with a review of the previous plan approved in June 2007. The review identified areas that needed to conform to changes in federal and state regulations, and also identified new ways the public could be engaged to maximize participation. This step was conducted simultaneously with a review of plans prepared by other RPAs around the country to identify progressive strategies to engage the public.

As part of the update of this PPP, staff contacted stakeholders to: 1) provide the agencies and committees with an overview of the plan, 2) request participation in a review of the plan, and 3) solicit comments to improve the engagement strategies and to identify other agencies or committees that should be considered key stakeholders in the process.

Written comments and a description of changes made to this plan as a result of the public review period are included in this plan in section 3.

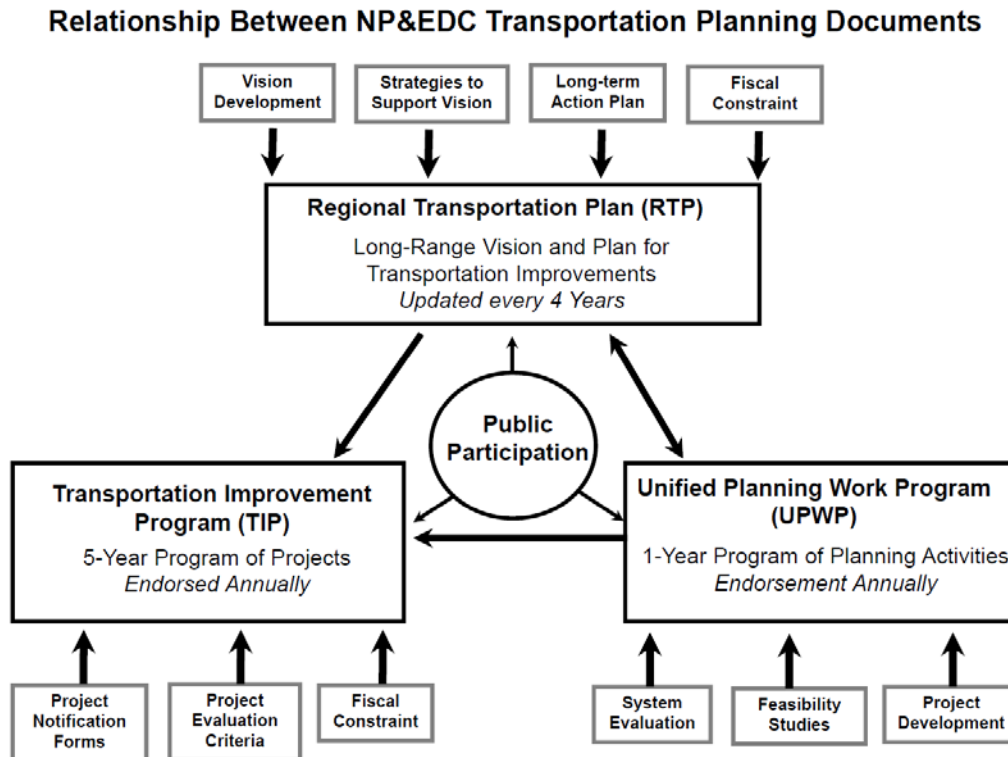
2. Public Participation Plan

This Public Participation Plan (PPP) provides the opportunity for interested parties to comment on the transportation planning that the NP&EDC does for the region. This includes:

- Making Regional Transportation Plans (RTP), Transportation Improvement Programs (TIP), Unified Planning Work Programs (UPWP), and other transportation studies available for public review 30 days in advance of NP&EDC meetings where documents will be endorsed.
- Scheduling opportunities for the public to comment at convenient and accessible places and times.
- Using visualization techniques in transportation documents and planning activities. These techniques may vary, but can include maps, charts, transportation models, and animation.
- Providing the RTP, TIP, UPWP, and other transportation studies in electronic and accessible format on the Town's website.

2.1 Resource Documents

This section describes the documents that are routinely updated and will be required to adhere to the PPP. The chart below depicts the relationship between these documents.



2.1.1 Regional Transportation Plan (RTP)

The RTP is required under federal SAFETEA-LU law, and is a comprehensive report, updated every four years, that identifies existing conditions, as well as problems and deficiencies, of the Island's transportation infrastructure. The infrastructure includes roadways, public transportation, bike and pedestrian facilities, parking facilities, ferry facilities, and airport facilities. The RTP also articulates the goals and objectives for future projects and programs to improve the system, and provides a 25-year fiscally constrained schedule for implementing the recommended improvements.

The draft RTP shall be developed in consultation with state and local agencies responsible for land use management, natural resources, environmental protection, conservation, and historic preservation, as well as with representatives of public transportation, freight transportation, bicycle and pedestrian facilities, and disabled populations. The draft shall be made available for public review at least thirty days prior to the NP&EDC endorsement. Copies shall be made available at the NP&EDC office, Board of Selectmen's office, and the Nantucket Atheneum, as well as in an electronic format on the NP&EDC webpage. At least one public hearing shall be held before the endorsement to solicit public comments and questions.

2.1.2 Transportation Improvement Program (TIP)

This is the short-range transportation programming document that includes a prioritized listing of improvement projects (both roadway and transit projects) identified in the RTP that would utilize federal funding for implementation. The TIP must be financially constrained and endorsed annually by the NP&EDC.

The draft TIP shall be developed in consultation with the Town of Nantucket, Nantucket Regional Transit Authority, and MassDOT. The draft shall be made available for public review at least thirty days prior to the NP&EDC endorsement. Copies shall be made available at the NP&EDC office, Board of Selectmen's office, and the Nantucket Atheneum, as well as in an electronic format on the NP&EDC webpage. At least one public hearing shall be held before the endorsement to solicit public comments and questions.

2.1.3 Unified Planning Work Program (UPWP)

The UPWP is a document that describes all of the transportation planning activities expected to be undertaken in the Nantucket region during the year. The UPWP is endorsed annually by the NP&EDC, and is one of the federal requirements for a certified transportation planning process that is a prerequisite for the receipt of federal funding for transportation improvements for roads or transit in the region.

The draft UPWP is prepared with input from the Town of Nantucket and MassDOT. The draft shall be made available for public review at least thirty days prior to the NP&EDC endorsement. Copies shall be made available at the NP&EDC office, Board of

Selectmen's office, the Nantucket Atheneum, as well as in an electronic format on the NP&EDC webpage. At least one public hearing shall be held before the endorsement to solicit public comments and questions.

2.1.4 Amendments and Adjustments to the RTP, TIP, and UPWP

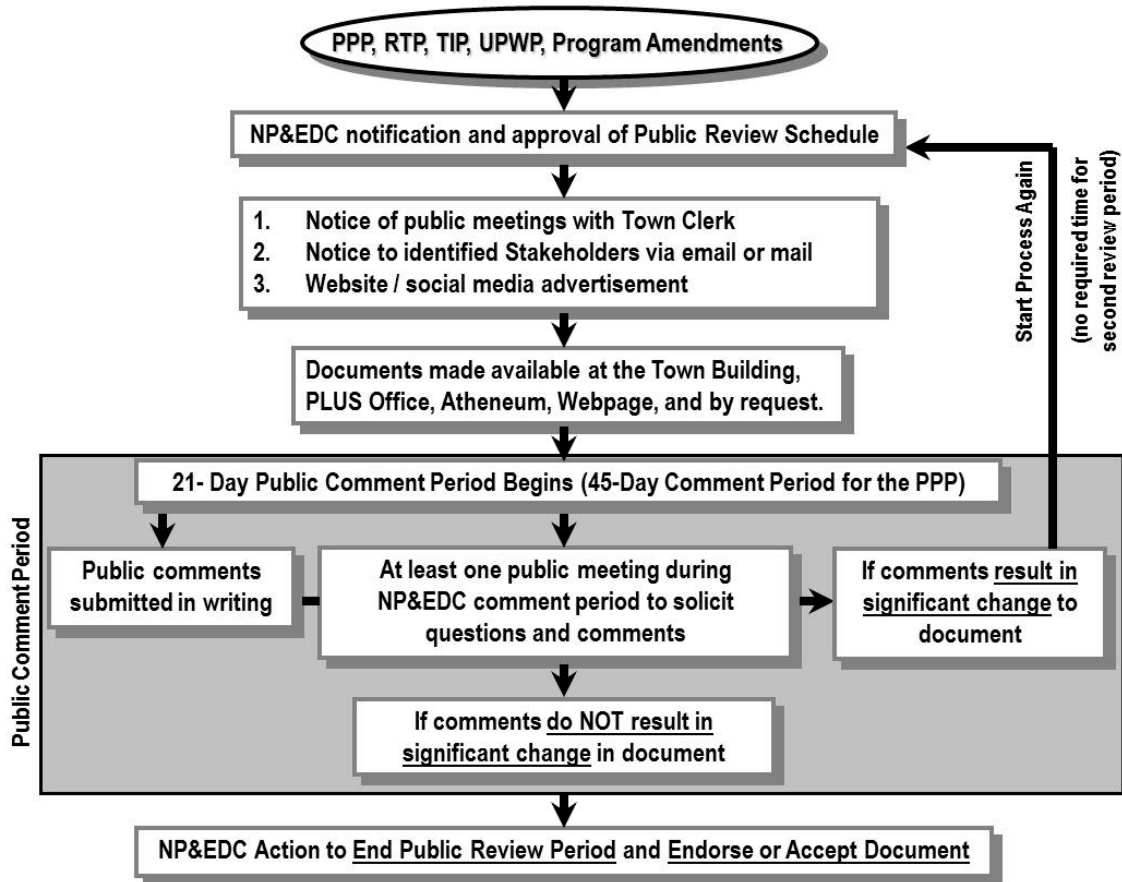
Following the endorsement of the RTP, TIP, or UPWP, there may arise an issue that will require that these documents be changed. Amendments are changes, such as the addition or deletion of a project, program, or task from the RTP, TIP, or UPWP, that are considered significant and require notification of a comment period and a public meeting prior to NP&EDC vote. Adjustments are changes, such as new funding amounts or new descriptive narratives, which are considered minor and do not add or delete a project, program, or task from the RTP, TIP, or UPWP. Adjustments do require a public meeting prior to approval, but do not require notification of a public comment period.

2.1.5 Transportation Planning Studies

These studies are routinely undertaken by the NP&EDC to address the goals and objectives stated in the RTP, and to provide required information and potential recommendations for the TIP. Funding for these studies can originate from the UPWP, but can be provided through other sources, such as the Town of Nantucket.

A draft study shall be developed with input from identified stakeholders. Copies shall be made available at the NP&EDC office, Board of Selectmen's office, the Nantucket Atheneum, as well as in an electronic format on the Town's website. At least one public meeting shall be held to present the contents and conclusion(s) of the study. This will be an opportunity for the public, as well as the NP&EDC, to comment and ask questions before action to accept a study and incorporating any recommendations into the RTP or any other implementation strategies.

2.2 Public Review Process



2.2.1 NP&EDC Notification

The NP&EDC shall be informed by the Planning Office (staff to the NP&EDC) at the beginning of the development of, or amendment/adjustment to, the Regional Transportation Plan, TIP, UPWP, or transportation planning study, and shall have an opportunity to provide comments on the scope and ways to involve the public in the process. At the time of notification, the NP&EDC should discuss and approve the scheduling of future public meetings required as part of the public participation process.

2.2.2 Public Meeting Notice

Notices of meetings where these plans, programs and studies will be discussed shall be made not less than 48-hours in advance through the Nantucket Town Clerk, which is posted in the Town Clerk's office, on the meeting notice board of the Town and County Building located at 16 Broad Street, and on the Town's website – www.nantucket-ma.gov.

The notice of meetings shall also be sent to all interested parties listed in the NP&EDC's mailing list (see item 2.2.5 below), and anyone who has subscribed to receive notices posted with the Town Clerk.

If the NP&EDC schedules a public hearing for any planning issues, a notice of the hearing notice will be advertised in the local newspaper – the *Inquirer and Mirror* – which issues weekly editions every Thursday.

2.2.3 Advertisement

Advertisements announcing the 21 day public review period, the availability of draft copies of the RTP, TIP, UPWP, or amendments to these documents, and the opportunity to review and comment on the document will be published on the Town of Nantucket's website – www.nantucket-ma.gov – and social media outlets such as Facebook and Twitter - @TownofNantucket. A forty-five day period will be advertised for any changes to the PPP.

Other advertisement strategies, such as press releases, should be used as needed to maximize public notification in the transportation planning decision making process.

Although amendments, as described in section 2.1.4, to the RTP, TIP, and UPWP are considered significant and require notice of a public comment period, adjustments are considered minor and do not require advertisement.

2.2.4 Review of Drafts

There will be at least a twenty-one(21) day review period prior to the endorsement of the RTP, TIP, UPWP, or Amendments to these documents. There will be at least a forty-five day period will be advertised for any changes to the PPP.

Although amendments to the RTP, TIP, and UPWP are considered significant, adjustments to these documents is considered minor and do not require a public comment period.

Copies of the drafts shall also be readily available to the general public at the PLUS office, Town Building, Nantucket Atheneum, or by request via telephone, email, or fax.

An accessible electronic version of the draft will be made available on the Town's webpage – www.nantucket-ma.gov – during the public review period.

At least one public meeting will be held when developing or amending/adjusting the PPP, RTP, TIP, UPWP, or transportation planning study. The number of public meetings will be in proportion to the significance of the item under consideration.

If the public comments or interagency comments result in significant changes to the draft document, then an additional public review period will be started to allow review of the

changes. There is no required time for the additional review period, but a two week (14 day) period could be used. Written comments and a summary of changes to a draft document resulting from these will be made part of the final RTP, TIP, UPWP, or major transportation planning study.

The NP&EDC staff is available to meet with local officials or any other interested community members to discuss or receive written comments on the RTP, TIP, UPWP or major transportation planning study.

Although the community is well below the recommended threshold for providing translation services, staff for the NP&EDC will attempt to translate any document using free online services, or by contacting other public agencies for assistance with oral translation. The NP&EDC will also rely on the bi-lingual network setup by the Nantucket Regional Transit Authority (NRTA).

As part of the NP&EDC's public outreach planning staff consults with a variety of stakeholders representing outside agencies and population groups, such as the Commission on Human Services, NRTA Advisory Board, and Housing Authority. Such consultation was part of the update of the RTP in FY 2015. Each of these agencies and committees are consulted with to solicit issues and concerns, even on an anecdotal level, for all population groups including LEP populations.

2.2.5 Transportation Stakeholder List

- This list contains the following interested parties:
 - Representatives of Nantucket in the Federal and State Legislature
 - MassDOT liaison
 - Wampanoag Tribe of Gay Head – Cultural Resource Protection
 - Woods Hole, Martha's Vineyard and Nantucket Steamship Authority
 - NP&EDC members
 - Town Manager
 - Nantucket Regional Transit Authority Administrator
 - Nantucket Natural Resources Coordinator
 - Nantucket Public Schools Administrator
 - Roads and Right of Way Committee
 - Bicycle and Pedestrian Advisory Committee
 - Council on Aging
 - Council for Human Services
 - Housing Nantucket
 - Commission on Disabilities
 - Nantucket Interfaith Council
 - Fire Department
 - Police Department
 - Department of Public Works
 - *The Inquirer and Mirror* newspaper
 - And members of the general public, if requested

- Anyone can be added to the list upon written request to the NP&EDC.
- Anyone that has subscribed to receive alerts/notices through the Town of Nantucket website will also receive NP&EDC notifications.
- Planning staff will be available to meet and review drafts with any committee or agency upon request during regular business hours.

2.2.6 Summary of Public Participation Opportunities

Program	Public Meeting Requirements	Comment Period (Minimum)	Advertising
Public Participation Plan (PPP)	One meeting prior to start of public comment period and one additional meeting during public comment period	45 days	Public meeting notices. Notification to the identified stakeholders via mail or email. Public notification via website posting and social media. Availability of document for review at the Town Building, PLUS Office, and Atheneum during and after the public comment period.
Regional Transportation Plan (RTP)	One meeting prior to start of public comment period and one additional meeting during public comment period	21 days	Public meeting notices. Notification to the identified stakeholders via mail or email. Public notification via website posting and social media. Availability of document for review at the Town Building, PLUS Office, and Atheneum during and after the public comment period.
Transportation Improvement Program (TIP)	One meeting prior to start of public comment period and one additional meeting during public comment period	21 days	Public meeting notices. Notification to the identified stakeholders via mail or email. Public notification via website posting and social media. Availability of document for review at the Town Building, PLUS Office, and Atheneum during and after the public comment period.
Unified Planning Work Program (UPWP)	One meeting prior to start of public comment period and one additional meeting during public comment period	21 days	Public meeting notices. Notification to the identified stakeholders via mail or email. Public notification via website posting and social media. Availability of document for review at the Town Building, PLUS Office, and Atheneum during and after the public comment period.

Amendments to RTP, TIP, or UPWP	One meeting prior to start of public review of amendment and one additional meeting for approval	21 days	Public meeting notices. Notification to the identified stakeholders via mail or email. Public notification via website posting and social media. Availability of document for review at the Town Building, PLUS Office, and Atheneum during and after the public comment period.
Adjustments to RTP, TIP, or UPWP	One meeting for approval of adjustments	None	Public meeting notices. Notification to the identified stakeholders via mail or email. Public notification via website posting and social media.
Transportation Studies	One meeting at start of study and one additional meeting to present results and recommendations	None. Outreach efforts to identified stakeholders will be identified before start of study	Public meeting notices. Notification to the identified stakeholders via mail or email. Public notification via website posting and social media. Availability of document for review at the Town Building, PLUS Office, and Atheneum during and after the public comment period.

3. Public and Staff Written Comments during the Public Review Period

The written letters attached to this section were received by the Planning Office during the 45-day review period from the public and various agencies concerning the draft version of this PPP. Other written comments are from staff addressing the comments received in these letters.