

## Public Comments Submitted to the Boston Region MPO

January 16, 2025

**The following written comments were submitted during the 30-day public comment period for the draft update to the Disparate Impact and Disproportionate Burden Policy:**

Subject: DI/DB Policy Feedback (Public comment)

Message:

Dear Betsy,

I am a member of the MPO Vision Zero Task Force. I want to be clear that the following is offered as a comment by a private individual, not as an MPO Vision Zero Task Force Member.

The Boston Region MPO's revised DI/DB policy improves clarity while continuing to adhere to the intent and letter of the relevant federal regulations. The application of a "limited English proficiency" designation (per Federal Civil Rights policy) is of special interest. It is unclear to this lay reader how this metric will apply.

Here in Marblehead, we have a long history of Jewish exclusion, from Klan rallies to "gentleman's agreements" and redlining. This historic antisemitism is literally written on the town's landscape, with the majority of Jews and the centers of Jewish life existing only at the fringes of town -- near the Swampscott border. It is perpetuated by paid staff, nominally apolitical technocrats, who have work to exclude the Jewish community from the road safety conversation. This, in turn, is reflected in the dangers posed to particularly elderly and young Jews by high-speed motor vehicle traffic. Marblehead's Jews include significant numbers of foreign-born (notably Russian and Ukrainian) who are not native English speakers.

It is unclear to me how the MPO would determine whether this group speaks English "very well" or not based on my (again, lay) reading of the document. The local officials who prepare and submit applications to the MPO have in the recent past excluded the Jewish community from decision making, so this is of special concern.

Daniel Albert