



2006 Public Involvement Policy

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Working DRAFT in Progress



Pima Association of Governments

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1. INTRODUCTION

This *Public Involvement Policy*, hereafter referred to as the PIP, **is an amended version of the January 2006 Public Involvement Policy**. The PIP reinforces Pima Association of Governments' long-standing commitment to public involvement in its planning and program efforts. Properly designed and implemented, public involvement efforts improve all levels of decision-making. Public involvement provides a structure that can help integrate technical and non-technical input into complex planning problems leading to: solutions that fit better into the community, address public priorities and concerns, minimize negative impacts, and respect shared quality-of-life values. Public involvement also reaps intangible benefits, such as improved relationships between government and the public and enhanced understanding of community-related issues.

This PIP is based on the results of a comprehensive evaluation of public involvement efforts undertaken by Pima Association of Governments (PAG) in the decade prior to 2004. The evaluation, conducted by an outside consultant, involved an extensive review of current regulatory requirements and literature on best practices in public involvement efforts nationwide. Additionally, over 30 in-person interviews were conducted with PAG member jurisdictions, community leaders and PAG staff. The interviews assessed internal and external stakeholder perceptions regarding PAG's effectiveness in meeting the goals of the 1994 PIP; the effectiveness of public involvement techniques and methods employed by PAG during that time and recommendations for enhancing the effectiveness of PAG's future public involvement practices. An Executive Summary of the Evaluation Report is presented as *Appendix D*.¹

¹ *Appendices A – C, include a Glossary of Terms, Abbreviations and Acronyms, and External References and Resources, respectively.*

The 1994 PIP was prepared to meet Federal Highway Administration (FHWA) regulations (23 CFR 450.316 [b] [1]), which require PAG, as a metropolitan planning organization, to have a public involvement process in order to qualify for federal funds to advance regional transportation planning efforts. The 1994 PIP responded to these regulatory requirements and strengthened PAG's historical commitment to public involvement. The 2006 PIP builds on the foundation laid by the 1994 PIP and is expanded to serve as an agency-wide policy document applicable in whole or in part to all PAG planning and program areas.

2. POLICY STATEMENT AND SCOPE

PAG is committed to involving members of the public throughout the region in the development and implementation of agency-wide plans and programs. Public involvement processes must be appropriate, accessible, transparent, accountable, meaningful and inclusive of the region's diverse population.

This policy incorporates FHWA requirements for publication of the solicitation of public input in decision-making processes, including: (1) proactive solicitation of public comments (2) early and continuous solicitation of public comments, (3) explicit consideration and response to public comments and (4) a written summary and disposition of significant public comments received during the development of transportation planning and investment studies. (23 CFR 450.316 [b] [1]).

As the designated Section 5307 Funds recipient primarily responsible for developing the Program of Projects (49 U.S.C. 5307(c), PAG's public involvement process for the development of its Transportation Improvement Program satisfies the public participation process for the Program of Projects (FTA Circular 9010.1D)

Additionally, PAG will continue to incorporate best practices in public involvement; to use a

range of methods to ensure an appropriate level of public involvement in agency planning and program efforts, and to further emphasize the needs of the underserved/under-represented, including low income, minority, elderly and disabled populations. (See Appendix E.)

PAG recognizes that its state, local and tribal governmental partners also have their own public involvement policies, regulations and/or procedures for use in the development of their plans. PAG's regionally oriented public involvement efforts should be coordinated with the public involvement efforts of its partners.

Scope of PIP

The PIP applies agency-wide and emphasizes a common framework within which the public involvement of all PAG programs is to be developed and implemented. Because PAG receives federal funds for some programs, all of PAG's programs are subject to Title VI regulations. This common requirement was one of the catalysts for updating the PIP for application agency-wide. This broader application should foster a more unified and efficient approach to public involvement across all PAG programs.

This PIP applies only to plan and program development for which PAG is the lead agency. The PAG executive director will review and approve PAG's planning and program activities consistent with this policy and associated procedural guidelines.

PAG develops and adapts a variety of regional transportation plans on an ongoing basis, such as the long-range Regional Transportation Plan (RTP), the short-range Transportation Improvement Program (TIP), the Intermodal Management System Plan, the Tucson Metropolitan Short-Range Transit Plan, the Regional Plan for Bicycling, the Regional Pedestrian Plan, and the Public transit-Human Services Coordinated Transportation Plan. PAG also periodically develops and adopts water quality plans, such as the 2008 Revision to the Carbon Monoxide Limited Maintenance Plan.

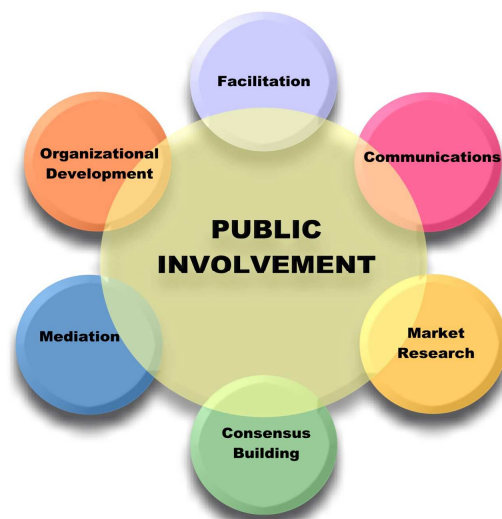
Beyond these formal planning and decision-making activities, PAG conducts programs that involve the development and dissemination of public information regarding services and funding opportunities. Among these programs are the Rideshare and Travel Reduction Programs, and PAG's regional Social Services Block Grant Plan. These programs are subject to this PIP to the extent that the policy and procedural guidelines are relevant and applicable.

Not Subject to Guidelines: Use of the policy may not be necessary for normal course-of-business activities that do not significantly affect the public or alter public policy. Examples of PAG activities that are not subject to this PIP include minor modifications to the TIP and PAG routine activities.

3. LEVELS OF PUBLIC INVOLVEMENT

Public involvement includes a wide range of practices that draw from a variety of disciplines and fields, such as social science research, communications, facilitation and mediation, organizational development, consensus building, and market research as illustrated below in Exhibit 1.

Exhibit 1
**PUBLIC INVOLVEMENT:
A MULTIDISCIPLINARY PROCESS**



The level of public involvement and methods will vary depending on the scope of a particular planning or program effort. Exhibit 2 (page 4) identifies levels of public involvement for this PIP, including: (1) Public Information, (2) Informed Consent Public Involvement, (3) Substantive Public Involvement, and (4) Agreement-Seeking Public Involvement. Each level represents increasing interactivity and public influence on PAG's decision-making processes.

Determining what level of public involvement to undertake is the first step in designing a public involvement program. It is also an important tool for communicating to the participants in the planning process the objectives and strategies for obtaining public input.

Most public involvement activities at PAG are associated with proactive elements of decision-making processes conducted to assure due consideration will be given to public concerns, values and preferences when decisions are made. Public involvement processes associated with decision-making always incorporate public information and often use public relations/marketing tools to foster public awareness of and interest in the planning process and effective two-way dialogue. However, public involvement in this context differs from "public relations and marketing" in that its intent is not to sell the public on a predetermined outcome or product.

plan or program under consideration and parties with an interest in the plan or program.

General Public: The general public includes the broad spectrum of populations who may or may not be directly impacted by or interested in a particular issue.

As an association of governments, PAG coordinates regional plans and programs that cross jurisdictional boundaries. For such regional plans and programs, PAG must take into consideration all those people who are served by the jurisdictions and tribal governments that make up the association, including the City of Tucson, the City of South Tucson, Pima County, the Town of Marana, the Town of Oro Valley, the Town of Sahuarita, the Pascua Yaqui Tribe, and the Tohono O'odham Nation (see Exhibit 5). In the case of more localized planning studies for which PAG is the lead agency, the public is defined by the specific geographic areas for those studies.

4. THE PUBLIC

For purposes of this PIP, "the public" consists of the following:

Internal Stakeholders: Internal stakeholders include other PAG program staff and governmental partners who ultimately have final decision-making authority over PAG's planning and program efforts.

External Stakeholders: External stakeholders include parties who will be affected by the

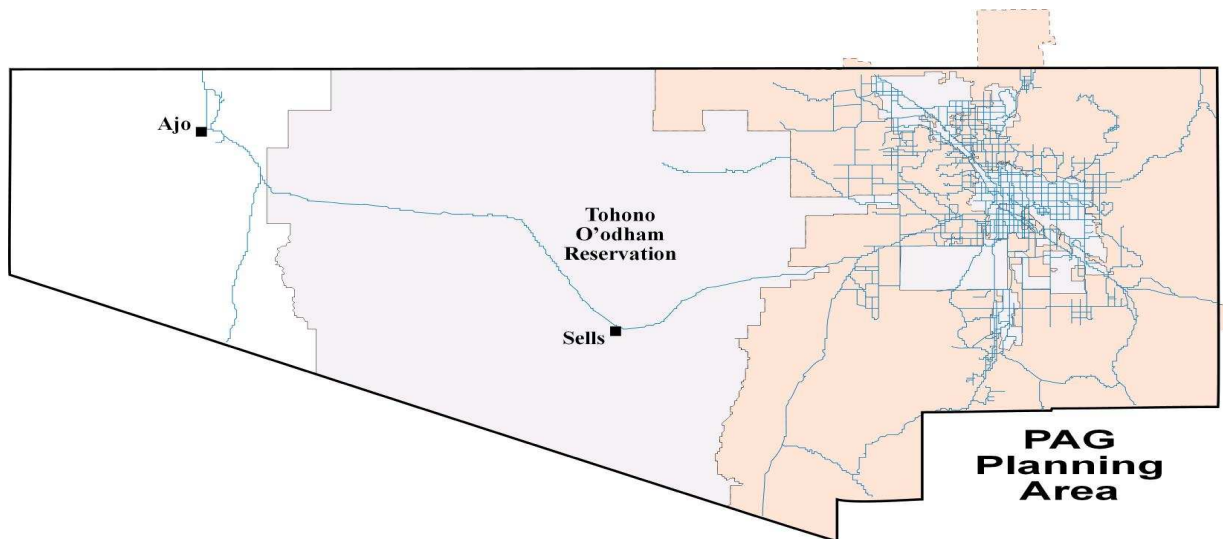
Exhibit 2
LEVELS OF PUBLIC INVOLVEMENT

	1. PUBLIC INFORMATION	2. INFORMED CONSENT PUBLIC INVOLVEMENT	3. SUBSTANTIVE PUBLIC INVOLVEMENT	4. AGREEMENT-SEEKING PUBLIC INVOLVEMENT
GOAL	To provide objective, balanced information to assist the public in understanding regional issues and planning and program efforts.	To gather input for informed consent.	To provide repeated opportunities for substantive input.	To reach decisions based on consensus with stakeholders.
PROMISE TO THE PUBLIC	PAG will keep you informed of the progress of a decision-making process OR PAG will provide information to raise awareness about regional issues and/or PAG products and services.	PAG will keep you informed and listen to and acknowledge your concerns and suggestions prior to the formal adoption or approval of a plan or program.	PAG will work to ensure that your concerns, values and ideas are directly reflected in the goals, priorities and alternatives developed, and to consider and reflect your recommendations in the final decision to the greatest extent possible.	PAG will implement the resulting decision.
EXAMPLE TOOLS <i>Note: All levels will include at least some of the types of tools from the preceding level(s).</i>	<i>Print, Electronic and In-Person Communication Methods</i> <ul style="list-style-type: none"> ▪ Fact Sheets/Newsletters ▪ Displays ▪ Brochures ▪ Websites/Social Media ▪ Seminars ▪ Press Releases ▪ Ads/Media Campaigns 	<i>Events for Public Input on Proposed Action or Policy</i> <ul style="list-style-type: none"> ▪ Public Hearings ▪ Public Meetings ▪ Open Houses ▪ Surveys/Questionnaires ▪ Speakers' Bureau ▪ PAG Standing Committees 	<i>Series of Ongoing Events/ Activities with Targeted Stakeholders and General Public</i> <ul style="list-style-type: none"> ▪ Citizen Advisory Committees ▪ Planning Charrettes ▪ Workshops ▪ Facilitated Policy Dialogues ▪ Partnerships ▪ PAG Working Groups 	<i>Consensus-based Decision-Making Group(s):</i> <ul style="list-style-type: none"> ▪ Professionally Mediated or Facilitated, Multi-Party Stakeholder Negotiations ▪ Ballots ▪ Alternative Dispute Resolution Methods
EXAMPLES OF PAG PROGRAMS CONDUCTING PUBLIC INVOLVEMENT AT THIS LEVEL	<ul style="list-style-type: none"> ▪ Sun Rideshare ▪ Travel Reduction Program ▪ Regional Data ▪ Storm Water Permit Seminar ▪ Transportation Enhancements 	<ul style="list-style-type: none"> ▪ TIP Open Houses ▪ 208 Plan Amendment Public Hearings 	<ul style="list-style-type: none"> ▪ 2040 Regional Transportation Plan ▪ RTP Task Force ▪ RTP Program for Active Community Engagement <ul style="list-style-type: none"> - Peer Facilitation Initiative - Community Roundtables 	None. PAG has not conducted this type of public process in the past and would only undertake such a process at the direction of Regional Council.

Source: Accountability (EM-22), U.S. Department of Energy, developed by James L. Creighton & Creighton, n.d.; the International Association of Public Participation Spectrum, 2000; and CDR Associates' public involvement model.

Note: Many public involvement plans incorporate elements from one or more levels. For example, PAG's 2030 Regional Transportation Plan "Program for Active Community Engagement" included a comprehensive public involvement effort using multiple elements from the first three levels (e.g., media campaigns, brochures, fact sheets, newsletters, videos, surveys, Speakers' Bureau, facilitated policy dialogues, etc.).

**Exhibit 3
PAG PLANNING AREA**



5. TITLE VI AND ENVIRONMENTAL JUSTICE

Title VI of the 1964 Civil Rights Act states that “No person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.” Title VI prohibits recipients of federal funds from actions that reflect “intentional discrimination” or that exhibit “adverse disparate impact discrimination” on the basis of race, ethnicity, or national origin.

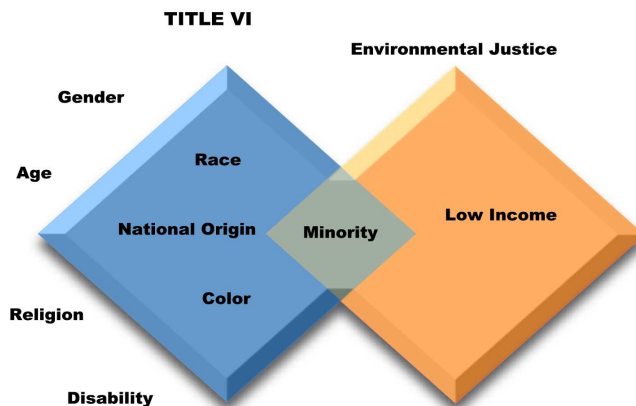
The *Civil Rights Restoration Act of 1987* amended Title VI so that recipients of federal aid must comply with the non-discriminatory requirements in all their activities, not just the programs and activities that directly receive federal support. That is, government agencies that receive any federal funds must avoid discriminatory impacts not only when setting policy for federally funded programs but also for programs that are entirely state or locally funded.

Title VI provides one of the principal legal underpinnings for environmental justice, which was first identified as a national policy in 1994 when President Clinton signed *Executive Order 12898 Federal Action to Address Environmental Justice in Minority Populations and Low-income Populations*. This order requires that each federal agency shall, to the greatest extent allowed by law, administer and implement its programs, policies and activities that affect human health or the environment so as to identify and avoid disproportionately high and adverse effects on minority and low-income populations. As illustrated in Exhibit 4 (page 6), the Executive Order applies to a wider population than Title VI. Taken together, Title VI and Environmental Justice (EJ) stakeholders are individuals as well as protected populations, including: (a) minorities based on race, religion, or national origin; (b) low income residents; (c) elderly residents; and (d) disabled residents. (See *Appendix F for further details on identifying protected populations.*)

PAG’s public involvement work plans should provide full and fair participation for all potentially affected communities. Identifying these communities requires close coordination between the development and implementation of the public involvement

effort and the data collection and analysis phases of the planning process, all of which are subject to Title VI and Environmental Justice provisions. The data collection phase provides information on the protected populations, which are often synonymous with the underserved/under-represented populations and, therefore, may need particular attention in the public involvement effort. The analysis phase provides information on the potential level of impact to the various populations which will need to be integrated into those public involvement efforts seeking input on alternative development, alternative preferences, and/or mitigation.

Exhibit 4
RELATIONSHIP OF TITLE VI & EJ



6. PUBLIC INVOLVEMENT GOALS AND STRATEGIES

This section presents the goals and strategies associated with key elements in developing and implementing a public involvement effort, including: (1) scoping and management; (2) budgeting, efficiency and coordination; (3) stakeholder identification; (4) solicitation of public input; (5) communications and information; (6) public input documentation,

response; and (7) use in decision-making, level-of-effort and effectiveness evaluation.

More specific procedural guidelines are also included in this PIP to foster consistent implementation of the goals and strategies described below:

1. SCOPING AND MANAGEMENT

Goal #1: *To develop and implement public involvement plans.*

Strategies

- Provide sufficient resources to develop public involvement plans for PAG's major plans and other PAG plans, as appropriate, and to implement the plans once approved.
- Designate a PAG staff person to lead each public involvement effort and to be the primary contact with the internal and external stakeholders and the general public.
- Establish the scopes of public involvement efforts and prepare written public involvement work plans. Each work plan (see appendices M and N) should:
 - identify the appropriate level of public involvement and select activities that support that level (*See Section 3, Public Involvement Levels, Exhibit 2, Page 4.*)
 - present a structured yet flexible approach that defines the planning being addressed, goals and objectives for the public involvement effort, and the relationship of milestones in the decision-making process with steps to maximize meaningful public involvement.
 - meet all applicable regulatory requirements.
 - be developed with input from PAG staff involved with related efforts and from representatives of PAG member jurisdictions and tribal governments and of applicable state agencies, with the

goals of identifying opportunities to cooperate and coordinate by such means as piggy-backing on other current or planned public involvement efforts and of keeping elected officials informed of relevant outreach activities within their jurisdictions.

- be developed with participation from stakeholders, including any potentially affected Title VI and Environmental Justice protected populations, to the greatest extent possible. (See *Stakeholder Identification, Goal #3.*)
- contain criteria for evaluating the level of public involvement effort and effectiveness of the plan.
- provide a profile of the potentially affected community(ies), including such relevant data as demographic, socio-economic, housing, transportation and environmental. Additionally, overlay maps showing the geographic location of physical data are recommended for a better understanding of potential impacts of decisions on communities.

(See *Appendix G for guidance on preparing a public involvement work plan.*)

2. BUDGETING, EFFICIENCY AND COORDINATION

Goal #2: *To demonstrate sensitivity to budget constraints.*

Strategies

- Be well informed of the general resources available to be used for public involvement, and to prepare a budget. The budget should present a detailed breakdown of the resources necessary to implement the public involvement plan, noting where resources may be maximized through efficiencies such as coordinated efforts with other PAG program and/or PAG member jurisdiction public involvement efforts. Consideration also should be given to allocating sufficient resources to develop a well thought out work plan, which will contribute to more effective and efficient implementation (See

Appendix H for sample public involvement budget worksheet).

- Identify other public involvement activities that may be under way within PAG or by PAG's partners for which there may be opportunities to coordinate through means such as shared distribution of materials, participation in activities, additional notification opportunities, etc.
- Seek ways to keep information about PAG's ongoing mission, plans and programs in the public eye on a regular basis to provide a foundation on which public involvement efforts can build more quickly.
- Attend stakeholder meetings and activities throughout the region on a regular basis with the goal of listening and learning what issues are being discussed, how those issues are being framed, different styles of communication employed by the public, etc. Increased familiarity with stakeholders' concerns and practices assists in developing a more well-informed and, thus, efficient public involvement plan.

3. STAKEHOLDER IDENTIFICATION

Goal #3: *To seek open and inclusive involvement of potentially affected and interested parties.*

Strategies

- At the beginning of public involvement planning, identify the affected parties and interested parties so that they may play a role in the development, as well as in the implementation, of the plan. (See *Appendix I for sample stakeholder identification worksheets.*)
- Make sure that Title VI and Environmental Justice-protected populations are identified and threshold concentrations are mapped, so that their particular concerns and needs can be considered during plan development with the objective of enhancing these populations'

involvement in the public involvement process. (See Appendix F for information on identifying protected populations.)

- Depending on the level of public involvement specified in the work plan, and its geographic scope, identify an appropriate balance of representation economically, socially and culturally.

4. GATHERING PUBLIC INPUT

Goal #4: *To ensure fair and equal access to the public input gathering.*

Strategies

- Select appropriate ways to gather input based on the level of public involvement specified in the work plan.
- Frame the questions to be asked of the public in a way that is relevant to the decision-making milestones identified in the work plan.
- Focus questions on issues that are interesting and appropriate to non-technical audiences (e.g., values, goals, and priorities, rather than technical solutions).
- Select a combination of methods and techniques to involve the public and foster a sense of public ownership of the process, thus further legitimizing the public involvement outcomes.
- Provide various involvement opportunities in a variety of formats to encourage participation from a broad and diverse cross section of the public.
- Include methods and techniques that may be particularly effective in involving traditionally underserved/under-represented populations. (See Appendix J for guidance on enhancing involvement of these populations.)

5. COMMUNICATIONS AND INFORMATION

Goal #5: *To provide full access to timely, accurate, relevant and understandable information.*

Strategies

- Provide notification and information in a timely manner to inform the public about the plan or program and related public activities in which interested parties may participate.
- Develop informational materials that are understandable and appropriate for their intended audience.
- Communicate clearly and repeatedly who will be making the decision, the milestones in the decision-making process, and how the public involvement opportunities relate to the milestones.
- Communicate in a culturally sensitive manner (e.g., translate into other languages as appropriate, reflect awareness of colors, terms, etc. that may be inappropriate or misunderstood).
- Make communication and information available in forms accessible to members of the public with disabilities (e.g., blind or deaf persons).
- Promote consistency across communication products to reinforce a unified PAG identity.

6. PUBLIC INPUT DOCUMENTATION

Goal #6: *To report public input results to decision makers and the public.*

Strategies

- Prepare a process flow chart that diagrams the points in the decision-making at which public input will be considered. (See Appendix K for description of a process flow chart.)
- Document public input in an efficient and accurate manner, including public input from Title VI protected populations, and distribute to decision makers in a timely fashion.

- Supplement hard copy distribution of results to decision-makers with presentations at relevant PAG committee meetings.
- Include documentation, as feasible, of the geographic distribution of participation and the social, economic and cultural representation.
- Report public input results to participants and the general public, and provide specific responses to individual comments and questions submitted through letters, email, phone calls, etc.
- Make input responses available to the public through various formats and media in keeping with communication and information objectives. (See *Communications and Information, Goal #5.*)
- Provide decision makers specific information on who and how the public was included in the planning process and how their input is reflected in the resulting proposed plan or program.
- Inform public participants over the course of the public involvement process how and by whom their input is being used in the decision-making process, or why it is not being used, thereby demonstrating responsiveness to participants who volunteered their time and energy to get involved.

7. LEVEL-OF-EFFORT AND EFFECTIVENESS EVALUATION

Goal #7: *To evaluate public involvement plans.*

Strategies

- Using the Level-of-Effort and Effectiveness Checklist (*Appendix L*), tailor the worksheet to your work plan.
- Conduct “touch-base” evaluations at milestones in the public involvement process to determine whether changes need to be made in the work plan during implementation.

- Conduct final evaluations at the completion of public involvement plans in a timely manner.
- Conduct a formal evaluation of the overall PAG PIP and its implementation every 5 to 10 years and prepare an update to address evaluation results. (Note: next update required by 2015.)

7. PROCEDURAL GUIDELINES

This section presents two sets of procedural guidelines. First is a general set of guidelines applicable to PAG programs agency-wide. Second is a targeted set of guidelines applicable to PAG programs and plans that seek public input for decision-making.

Included in the PIP appendices are public involvement templates customized for PAG’s — RTP, TIP and 208 Amendments. These templates combine as appropriate the general and targeted procedural guidelines and can be used as the foundation on which to build specific public involvement work plans for the particular programs covered.

Accountability for Guidelines: PAG Program Directors are responsible for ensuring that these guidelines are met and for ensuring that their program activities meet the most current legislative and regulatory requirements.

Exceptions to Guidelines: There may be circumstances in which a plan or program must be conducted in a time frame that does not allow adherence to the full range of public involvement procedural guidelines. In such circumstances, an alternative approach should be developed in consultation with appropriate PAG management and provided to the PAG executive director for review and approval. Under all circumstances, PAG programs must adhere to all applicable legislation and regulation. (See Appendix E)

General Guidelines:

PROCEDURAL GUIDELINES APPLICABLE AGENCY-WIDE

As a recipient of federal funding, PAG is subject to the following legislation agency-wide:

- Title VI of the 1964 Civil Rights Act (42 U.S.C. 2000(d).
- Executive Order on Environmental Justice (No 12898).
- Executive Order on Improving Access to Services for Persons with Limited English Proficiency (No. 13166).
- Americans with Disabilities Act (42 U.S.C.S. 12101 et seq.).

Each of these pieces of legislation has direct implications for public involvement. As noted in Section 5 of this PIP, Title VI says that “No person in the United States shall on the ground of race, color, or national origin, be excluded from participation in...any program or activity receiving Federal financial assistance.” The Executive Order on Environmental Justice further defines protected populations, while the Executive Order on Improving Access to Services for Persons with Limited English Proficiency addresses the barriers non-English speakers may encounter in trying to participate. The Americans with Disabilities Act addresses both physical and communication barriers that may hinder the attempts of the disabled to participate.

To foster participation, staff in each program should make sure that information is readily accessible, and make sure that the people likely to be affected by and/or interested in a program are identified and made aware of opportunities to participate. The following sections address each of these concepts in detail.

Access to PAG Information

PAG’s documents, data and information, with few exceptions, are a matter of public record. As such, any request from a member of the

public for a PAG document must be responded to in a timely manner. At a minimum, a written response must be provided within one week of the receipt of a public information request. Staff members who receive a public information request about which they have a question, such as a request for personal information about a staff member, should refer the request to the appropriate Program Director and/or to PAG’s Human Resources Director.

Stakeholder Analysis

One of the initial steps in developing a public involvement work plan is to analyze who will be affected and/or interested in the planning issue or policy being developed. This involves identifying both internal and external stakeholders. Internal stakeholders typically include PAG member jurisdictions and tribal nations, PAG staff involved in related activities, and other governmental agencies with jurisdiction or interest in the activity. External stakeholders typically include those non-governmental parties who may be affected by the activities and/or have an interest in them. This includes Title VI and Environmental Justice populations.

Many of PAG’s program areas have compiled their own lists of external stakeholders. It is recommended that for each new activity, or over the course of longer activities, these lists be reviewed to ensure they are up to date and reflect the broadest range of stakeholders reasonably possible. A common method for identifying additional stakeholders is to interview existing stakeholders to determine who else needs to be involved.

PAG’s public involvement staff maintains a large database of stakeholders and members of the general public identified through a variety of public involvement initiatives over the years. This database includes civic and community organizations serving Title VI and Environmental Justice populations, neighborhood and homeowner associations, environmental and business groups, elected officials, PAG member jurisdiction staff at

various levels, and other public groups. Public involvement staff is available to assist other agency staff in conducting stakeholder analyses and in accessing the public involvement contact database upon request.

Public Notification of PAG Activities and Services

Promotion of inclusive and accessible public involvement requires regular efforts within each PAG program area to notify a wide range of stakeholders and the general public regarding the information, data, funding, policy and planning issues being addressed.

Public information should be presented in formats that are accessible to the intended audiences. Public involvement program staff is available for consultation in determining what information is appropriate to publicize and in what form.

For reaching the general public, the Web site, Social Media platforms, and media outreach (e.g., press releases) are encouraged. For reaching stakeholder groups, distribution of public information documents such as reports and newsletters via email or direct mail also may be an effective communication method. Use of other methods should be considered to promote equal access to information for targeted audiences. In particular, efforts to overcome barriers to accessing information among underserved populations, youth and other individuals who may not have Internet access or read newspapers should be undertaken.

For example, public service radio announcements on Hispanic radio outlets are one method for reaching Hispanic populations, particularly non-English speaking Hispanics. Additionally, underserved populations are more likely to read information distributed through trusted and familiar communications channels. E-mail can be used to distribute notices to school and community-based newsletters for publication. Placement of English/Spanish information in libraries,

community centers, or other public places is another option.

Spanish Translations

Public information documents written in English, including meeting notices, should always include a tagline affirming that PAG will make reasonable accommodations to translate any materials in Spanish.

Spanish translations are encouraged for activities specifically targeted to the general public even without a request. Examples of materials to be translated include meeting notifications (e.g., flyer or Web posting). Additional information that could be translated includes any public meeting handouts, such as fact sheets, newsletters, and executive summaries of planning documents under review.

As a rule, Spanish-speaking staff should be on hand at public meetings intended for gathering input.

Committee Composition

Effort should be made to assess the composition of PAG's committees to ensure that invited members represent a cross section of key stakeholder groups.

Geographic Analysis of Underserved Populations

Staff within each PAG program area should periodically perform a basic visual assessment to identify the location of protected Title VI and Environmental Justice populations in relationship to the provision of information and planning products and services. PAG's online regional data can provide program staff with maps showing the location of protected Title VI and Environmental Justice populations for any specific geographic areas. ZIP Code maps can be used to show locations of people in databases. The maps of protected populations and mailing list ZIP Codes can be compiled as one way to demonstrate that protected populations are being notified

and/or involved. This documentation is important for demonstrating compliance with Title VI and Environmental Justice provisions.

Meeting Scheduling, Location, and Access

Scheduling: Public meetings should be scheduled to increase the opportunity for attendance by stakeholders and the general public. This may require scheduling meetings during non-traditional business hours, holding more than one meeting at different times of the day or on different days, and checking other community activities to avoid conflicts.

Location: When a public meeting or public hearing is focused on a planning study or program related to a specific geographic area or jurisdiction within the PAG region, the meeting or hearing should be held within that geographic area or jurisdiction. Appropriate elected officials as identified in the stakeholder analysis should be consulted and/or informed of relevant outreach activities within their jurisdictions.

Access: Public meetings should be held in locations accessible to people with disabilities and should be located near a transit route if possible.

Public information documents, including meeting notices, should always include text that makes it clear that the meeting space is ADA accessible.

Refreshments and childcare for meetings also should be considered.

(Appendix O offers a sample meeting/event preparation checklist.)

Targeted Guidelines:

PROCEDURAL GUIDELINES APPLICABLE TO SPECIFIC PLANS AND PROGRAMS

Procedural guidelines for selected plans and programs at PAG are provided below and address the following categories:

PAG PROGRAMS AND PLANS

Regional Transportation Plan*
Transportation Improvement Plan
Regional Plan for Bicycling
Regional Pedestrian Plan
Tucson Metropolitan Short Range Transit Plan
Intermodal Management System Plan
Transportation Corridor Studies
ITS Strategic Development Plan
Area wide Wastewater Management Plan (208 Plan)
Air Quality Limited Maintenance Plans*
Public Involvement Policy and Procedures
Clean Cities Strategic Plan
Regional Travel Reduction Plan
Regional Transportation Authority

Exhibit 5

Note: Step-by-step templates are provided in Appendix Q for those programs marked by an asterisk (*). For those programs for which templates are not provided, staff may want to prepare their own customized templates.

1. Design the Process
2. Notification Requirements (Content, Timing and Methods)
3. Distribution of Document for Public Review
4. Comment and Review Periods
5. Gather, record and distribute Public Comments/Consideration of Public Comment
6. Response to Public Comments
7. Process Document
8. Evaluation

Exhibit 5 lists the plans and programs subject to these procedural guidelines. These planning efforts share the following characteristics:

- They include the solicitation of public input for the development of plans or projects.
- They are subject to public involvement regulations as specified in such laws as the Clean Air Act, as amended, the Clean Water Act, as amended, and the most recent Federal Transportation Authorization Bill.
- They are part of a decision-making process that includes presentation of the final draft plan or program to the PAG Regional Council for approval or adoption.

1. DESIGNING THE PROCESS

At the outset of a PAG program planning effort, the person assigned the role of public involvement "lead" should prepare a work plan in consultation with the rest of the planning team. This work plan should identify the level of public involvement being conducted (see Exhibit 2), the milestones in the decision-making process, the methods that will be used for engaging the public, and the timeline.

At a minimum, the work plan should specify one early input opportunity in addition to a final public meeting/hearing for public input prior to Regional Council approval or adoption. An "early input opportunity" is any opportunity (e.g., a meeting) that allows the public to provide input early in the planning process.

The work plan also should map out the milestones in the decision-making process for the plan, and in a parallel mapping process, the public involvement opportunities to provide input for use at each decision-making milestone. For more complex and/or multi-year planning efforts, there may be multiple early input opportunities coinciding with each phase of the decision-making process.

Appendix G includes a checklist for preparing a public involvement work plan; *Appendix K* includes a sample process flow chart; *Appendix M* provides a tool kit of public involvement methods and techniques; and *Appendix P* provides additional public involvement tips;

and *Appendix Q* provides sample templates showing recommended approaches for applying the procedural guidelines to selected plans and programs.

2. NOTIFICATION REQUIREMENTS: TIMING, METHODS, AND CONTENT

Timing and Methods: Exhibit 6 provides information on recommended timing and methods of notification.

Notification Content: Notifications for formal public comment periods leading to plan adoption or approval constitute a legal notice. Such a notice should take the form of a display ad and be published in a prominent section of the newspaper as specified in the Notification Methods section of this policy.

Display ads for public education and/or input opportunities should be large enough to accommodate the information listed below. This information should be provided in a type size readable at all ages.

1. PAG logo
2. Name of activity/type of event
3. Name of sponsoring organization
4. Subject of meeting
5. Action to be taken and by whom
6. Day, date, time and location of meeting
7. Brief description of what the plan consists of and its geographic scope
8. Comment period (list beginning and end date of public comment period)
9. Where to obtain copies of the plan and how to provide comments
10. Contact for more information, including name, phone number, email address
11. ADA language, including translation services available (*italic type suggested*)

Exhibit 7 presents a sample display ad with its contents keyed to listed specifications.

Exhibit 6
NOTIFICATION TIMING AND METHODS

Note: The notification requirements for timing and methods detailed in Exhibit 6 below are categorized as follows: (1) notices of opportunities for early input that are not legally required but are encouraged under most federal policy guidelines; and (2) final public comment periods that are legally mandated.

	Timing	Methods
EARLY INPUT OPPORTUNITY (e.g., a public meeting, workshop, focus group, etc.)	30-45 calendar days in advance of a public involvement opportunity provide preliminary notification to stakeholder groups, organizations, associations, media and other entities that require longer lead times due to internal meeting and publication schedules.	<p><i>Calendar of Events Notices:</i> To appropriate media outlets found in PAG's media database.</p> <p><i>Direct Mail:</i> Send direct mail (e.g., fliers, newsletters, etc.) to internal and external stakeholders, using PAG's public participation database. Example stakeholders include: PAG committee members, local, state and federal elected officials and agency representatives; neighborhood and homeowner associations, civic and community groups, and social service agencies serving underserved populations.</p> <p><i>Website:</i> Post meeting notices and other notices of opportunities for public review and comment on draft documents on PAG's website in a highly visible location with appropriate links. Place draft documents on website for public review.</p>
	7-15 calendar days in advance of the public involvement opportunity (e.g., meeting, workshop, focus group, etc.) provide widespread notification to remind stakeholders and inform the general public about the opportunity.	<p><i>Press Releases:</i> Distribute press releases to major English-speaking and Spanish-speaking print and electronic media, and to <i>Sun Sounds</i>, an e-newsletter for the visually impaired.</p> <p><i>Display Advertisements:</i> Place one display ad in one to three major English language newspapers of general circulation, such as: <i>The Arizona Daily Star</i>, <i>the Daily Wildcat</i>, <i>Inside Tucson Business</i>, and <i>the Daily Territorial</i>. Place one display ad in a widely circulated Spanish publication, such as <i>La Estrella</i>. Place one display ad in one or more subregional newspapers, such as: <i>The Explorer</i> and <i>Green Valley News and Sun</i>.</p>

Exhibit 6 continued
NOTIFICATION TIMING AND METHODS

	Timing	Methods
<p>FINAL INPUT OPPORTUNITY (e.g., legally mandated public comment period prior to formal adoption/endorsement of a PAG plan or program by Regional Council)</p>	<p>30-45 calendar days in advance of Regional Council adoption of a plan or program document, provide notification of review period for public to comment on the draft final document.</p>	<p><i>Direct Mail:</i> Send an email or postcard to internal and external stakeholders, such as PAG committees, tribal representatives, local, state and federal elected officials and agency representatives as appropriate, neighborhood and homeowner associations, civic and community groups serving environmental, business, social service, elderly, and other interest groups, and other interested parties.</p> <p><i>Press Releases:</i> Provide press releases to print and electronic media region-wide. These releases can be addressed to calendar of events editors and appropriate news reporters. Also forward press release to <i>Sun Sounds</i>, an e-newsletter for the visually impaired.</p> <p><i>Website:</i> Post notice of final public comment period and public hearing (or final public meeting) date on PAG’s website and Social Media platforms.</p>

(See Appendix E for Legislative Requirements)

Exhibit 7
SAMPLE NOTICE OF PUBLIC MEETING



NOTICE OF PUBLIC HEARING

Pima Association of Governments (PAG)
2013-2017 Transportation Improvement Program

PAG Regional Council will consider the proposed 2013-2017 Transportation Improvement Program (TIP) for adoption at the regularly scheduled meeting on:

Thursday, June 27, 2012 ~ 9:00 am.
PAG's 5th Floor Conference Room
177 N. Church Ave., Tucson, AZ

The Transportation Improvement Program is the short-range (five-year) schedule of proposed transportation improvements within the Pima County, Tucson urbanized area.

Final comment period: May 1 - June 15, 2012. Copies of TIP and comment forms are available online at www.pagnet.org, at area libraries and at the PAG office at 177 N. Church Ave., Suite 405, Tucson, AZ 85701

For more information call the Public Involvement Specialist at 792-1093, ext. 503, or e-mail name@pagnet.org

Persons with disabilities needing auxiliary aids, translations into languages other than English or other services are requested to contact Pima Association of Governments 48 hours in advance. The facility location is wheelchair accessible.

3. DISTRIBUTION OF DOCUMENTS FOR PUBLIC REVIEW

Public Places: Place draft final documents for public review and comment in PAG offices, public libraries and other public places as appropriate.

Website: Place draft final documents on PAG's website for public review.

4. COMMENTS AND REVIEW PERIOD

The guidelines for notifying the public about final opportunities to review and comment on plans, policies and other documents that are to be acted upon by Regional Council are provided above under Notification Requirements. (See Exhibit 6, "Final Input Opportunity")

Once final public comments have been collected, decision makers should be provided adequate time for review and consideration of those draft comments. A suggested adequate review period is two weeks after the public comment period and two weeks in advance of the adoption or approval of a plan, policy or other document.

5. CONSIDERATION OF PUBLIC COMMENTS

PAG program staff should solicit public input on plans or programs under development in at least two forms. Some examples of ways to gather public comments include online surveys, written or audio comment forms, questionnaires, telephone surveys, transcribed proceedings from public hearings, facilitated dialogues and open houses.

Summaries of public comments should be documented, and verbatim comments should be compiled and kept on file for review upon request. Distribution of public input should follow the steps below as appropriate:

- Forward copies of the summary of public comments to decision makers responsible for approving or adopting the plan or program.

- Forward copies of the summary of public comments to the technical professionals involved in the development of the plan or program.
- Forward the summary of public comments to all committee members involved in advising on the plan or program development.
- Notify the public of the availability of the comment summary through news releases and direct mail to stakeholders.
- As feasible, develop and distribute public information documents (e.g., brochures, booklets) targeted to general public audiences describing public input results.

6. PAG RESPONSE TO PUBLIC COMMENTS

A critical aspect of public involvement for all plans and programs is letting the public know how their input is being used.

PAG staff designated as lead for a particular public involvement program — in consultation with the decision makers and technical professionals — should prepare written summaries on how public comments were used. As appropriate, these summaries should:

- Note the PAG action for which the public involvement effort is being conducted (e.g., updating of the Regional Transportation Plan, a 208 Plan amendment).
- Identify the matters on which public input was sought.
- Briefly describe the methods used to provide the public with information on the issues and to gather input.
- Identify general groupings of the public who commented (e.g., interest, demographic sub groupings).
- Categorize the public comments by major themes. Results can be presented in tabulated forms, tables, etc.

- Using the summary of public input by major themes, discuss how each is being or will be addressed, and, specifically, how and why the comments are or are not affecting the decision(s).
- Distribute response summaries to those who participated.

7. PROCESS DOCUMENTATION

It is important to have documentation that, if reviewed by a member of the public, PAG staff, PAG member jurisdictions, etc., would allow them to understand how the public involvement effort was conducted, how the public responded, and how the results were used in PAG's decision-making process.

In documenting the process, it is not necessary to reinvent the wheel. Many of the items listed below will have already been documented during the public involvement process and can simply be compiled in a notebook.

Final documentation for PAG public involvement efforts should include the following:

- Public involvement plan
- List of public information documents produced
- List of all media to whom each news release was sent and copies of the news release
- List of publicity obtained with copies of news articles, display ads, etc., and, if possible videos of TV spots
- List of public input opportunities provided (e.g., open houses, forums, workshops)
- List of methods used to gather public input and the instruments used (e.g., telephone surveys, questionnaires, flip chart recording)
- Compiled, verbatim public comments and list of ways made available (e.g. actual surveys, comment forms, summary of comments on website)

- Summary of public comments and list of places/ways distributed (e.g. summary of public input comments for planning efforts)
- Individual requests for information and related responses
- If applicable, public input summaries should also include:
 - Copies of all mailing lists used for direct mail, fliers, etc.
 - List of locations where documents for review were made available to the public
 - Documentation via maps, tables, or other means identifying correlation between protected populations and public involvement efforts

8. EVALUATION

All public involvement efforts should be evaluated in two ways:

- An ongoing evaluation to determine if the level of effort identified in the public involvement work plan is being met. For example, if a newsletter was specified on a quarterly schedule, the first level of effort question might be, "Was a newsletter produced?" If so, the second question might be, "Was it produced quarterly?" If a direct mail brochure with a reply card were specified, the question could be, "Was the direct mail letter prepared and sent?" If so, the second question might be, "Was the target of a 10% return on completed reply cards realized?"
- An evaluation at the conclusion of the public involvement effort to assess the effectiveness of effort in meeting the PAG PIP goals. Effectiveness is determined by measuring whether the public involvement effort achieved the overarching principles highlighted in *Section 2 Policy Statement and Scope*. For example, if a goal of the public involvement plan for an RTP update were to increase the public's awareness of the

region's long-range transportation issues, a before and after survey, interviews and/or focus group could be conducted to determine whether the goal of the outreach was met.

For more details, see Appendix L, Evaluating Public Involvement Plan Implementation

8. APPLICABILITY OF THIS POLICY TO PAG'S PARTNERS

Coordination and Cooperation

PAG staff responsible for public information and public involvement activities will coordinate with PAG member officials and staff to address the major issues that impact regional planning issues through:

- Joint public involvement when topics are related.
- Planning public involvement activities so that individuals and organizations affected or interested are not forced to address several requests for participation during the same time period.
- Application of relevant PAG public involvement guidelines to joint processes (e.g., notification procedures, etc.) as acceptable to PAG partners.

Local Public Involvement Efforts

PAG member jurisdictions are responsible for undertaking public involvement during the implementation of transportation and environmental plans and programs that are funded with federal dollars. This public involvement is a requirement of the National Environmental Policy Act (NEPA). There are opportunities for PAG and its partners to build on and integrate with each other's public involvement efforts at each stage of the planning and project implementation. Additionally, PAG staff will be available to provide advice and training to PAG partners on public involvement development and implementation.

State of Arizona Public Involvement Efforts

Various federal laws and regulations require coordination and cooperation between the State of Arizona and Pima Association of Governments as a metropolitan planning organization. In addition to clear mandates in the most recent Transportation Reauthorization Bill regarding coordinated transportation planning, PAG is also the lead agency for air quality planning, water quality planning and for coordination of regional solid waste planning. Since both regional and state level planning efforts require some public involvement, there are opportunities to identify common goals and objectives and work together to achieve greater efficiencies and effectiveness. For instance, to receive federal transportation funds, the State of Arizona must meet federal law and regulation requirements for preparation of a state transportation plan into which PAG's regional transportation plan must fit. The state plan, similar to the regional plan, includes public involvement information materials and activities designed to inform and gather input from the public during the planning process. The two efforts offer opportunities to share some resources such as staff hours, to expand both the state and PAG's public outreach, and to gather additional public input. In addition to the efficiencies that may come with coordination is the opportunity to provide the public with a more complete picture of the regional and state planning efforts and how they fit together.

9. ROLES AND RESPONSIBILITIES

Making public involvement an integral part of PAG planning and program efforts is a shared responsibility. Within this context, a variety of players have a role in supporting and implementing this PIP. This section calls out those players and their responsibilities in the development, approval and implementation of public involvement efforts and in the use of public input.

Regional Council: PAG's Regional Council provides leadership by setting policy direction, fostering and participating in public involvement initiatives, and openly considering the outcome of these initiatives when making decisions.

Executive Director: PAG's executive director is responsible for ensuring that public involvement is an integral part of the design, delivery, and evaluation of public policies, programs and plans. The executive director is accountable to the Regional Council for the effective implementation of such processes as reflected in the establishment of clear lines of responsibility and accountability, allocation of adequate resources, provision of training and professional development, assurance that the outcomes of public involvement processes are integrated into the decision-making process, and evaluation of the public involvement processes.

Program Directors: Program directors work closely with program managers (*see below*) to identify which PAG plans and programs require public involvement and at what level. (*See Section 3, Levels of Public Involvement.*) Program managers also review budgets and timelines and opportunities for coordination and/or efficiencies.

Program Managers: PAG's program managers determine which plan and program initiatives require public involvement processes, as well as take responsibility for planning, undertaking, and evaluating public involvement efforts. They are also responsible for ensuring coordination/collaboration of public involvement efforts within PAG, with member jurisdictions and tribal governments, and, where required, with other governmental agencies.

PAG Program Staff: Program staff implements public involvement initiatives identified by the program managers and in compliance with applicable laws and regulations.

Public Involvement Specialist: The primary responsibilities of PAG's public involvement specialist include:

(a) *PAG PIP and Procedural Guidelines*

- Manage the evaluation and update of PAG's PIP.
- Oversee the implementation agency-wide of the PIP and its procedural guidelines, including the timely documentation of all public involvement efforts.
- Hold periodic meetings with internal and external stakeholders to assess the effectiveness of PAG's public involvement effort.
- Provide quality assurance reviews of individual public involvement plans to ensure that they follow the PIP and are in compliance with applicable public involvement regulations.

(b) *Program-Specific Public Involvement*

- Provide advice and support in the development and implementation of public involvement plans for individual PAG program efforts.
- Provide support for program area public involvement activities, including strategic communications advice and planning and development of public information materials.
- Assist with identifying and selecting experts for such public involvement related activities as surveys, meeting facilitation, and market research.

(c) *Title VI and EJ Compliance*

- Assist with the development of information and maps on the location of protected populations to serve as a resource for the development of program-specific public involvement plans.

(d) *Regional Public Involvement Coordination*

- Assist with public involvement initiatives in the region, and tracking

and advising on coordination opportunities between PAG, PAG partners, and other governmental agencies and organizations.

(e) Public Involvement Training

- Keep abreast of state-of-the-art public involvement methods and techniques.
- Identify adequate training opportunities and recommend to the Executive Director those that would enhance staff abilities to conduct more effective and efficient public involvement.

(f) Stakeholder Database

- Manage maintenance of a database of the names and addresses of key stakeholders throughout the region.

Committees: PAG committees play a role in PAG’s public involvement efforts in two ways:

First, all committee meetings are open to the public, and meeting minutes are available to the public.

Second, many PAG committees include representatives of stakeholder groups, who in turn provide an ongoing link between PAG and the representatives’ constituencies. PAG’s committees are categorized in six major groups: Regional Council; Policy Advisory Committee; Standing Advisory Committees, Standing Advisory Subcommittees, Interagency Task Forces, and Interagency or Internal Working Groups. PAG committees offer an opportunity for public involvement ideas, to disseminate information to members of the public via committee members, and to be kept abreast of regional issues of concern.

10. COMPLAINT PROCEDURES

Complaints about the adequacy of any public involvement effort undertaken by any PAG program should be addressed first by PAG’s

public involvement specialist, who will work with the appropriate PAG staff to resolve the issue of concern. If the PAG public involvement specialist cannot resolve the issue, the complaint and steps taken to resolve it will be forwarded to PAG’s Executive Director.

11. EVALUATION AND UPDATE OF PAG PIP

PAG will review and evaluate the workability and effectiveness of this policy every 5 to 10 years through interviews with PAG program directors and staff, members of the public, and representative of PAG partners. In the interim, all PAG staff using this PIP to develop and implement public involvement plans should forward any observations about and/or lessons learned through using the PIP to the public involvement specialist, who will be responsible for maintaining this information for use in preparing the scope of work for the next PIP evaluation and update.

Amendments to and/or updates of this PIP will require a 45-day public comment period prior to adoption.

12. PUBLIC REVIEW AND ADOPTION OF THE AMENDED 2006 PAG PIP

This PIP went through a public review process as required under FHWA/FTA regulations (23 CFR, Part 450 Subpart C Section 316). The draft PIP was made available to the public for the mandated 45-day review period, beginning on Feb. 1, 2012. Notification of the public review period was undertaken through a display ad in the *Arizona Daily Star*. The draft document was made available on the PAG website, in PAG’s offices, in the Main Public Library, jurisdictional offices (Department of Transportation and Public Information/Community Relations Offices.)

PAG Staff and Jurisdictional Staff reviewed public comment and modifications were made based on input received.

This updated policy becomes effective upon adoption by Regional Council on XXXXX, 2012.