

**AGENDA ITEM #9: 2012 PUBLIC PARTICIPATION PLAN: FINAL DOCUMENT**

**SUBJECT:**

The 2012 HRTPO Public Participation Plan is ready for approval.

**BACKGROUND:**

At the September 2012 TTAC meeting, Ms. Kendall Miller, Public Involvement and Title VI Administrator, presented the draft 2012 Public Participation Plan (PPP). The Plan was updated and made available for public review and comment beginning on September 20, 2012 and ending on December 5, 2012. Two comments (attached) were received. The Plan is now in final form and will be available both in hard copy and online. The final document will be distributed during the meeting.

Attachment 9 – Public comments on draft PPP

Handout – 2012 Public Participation Plan: Final Document

**RECOMMENDED ACTION:**

Approve the 2012 Public Participation Plan.

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**HRTPO Public Comment**  
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**RE: 2012 Draft Public Participation Plan**

**Name:** Ms. Judith E. Brown  
**Date:** October 29, 2012  
**Subject:** Public Participation Plan

**Public Comment Input (Via E-Mail)**

Mr. Miller, This document is important and looks attractive.

However, it needs some good editing -- to make it clear and useful to the wider Hampton Roads community (and not just to people who attend HRPTO meetings or work for the TDCHR).

**Table of Contents – Poorly designed**

- What is on pages 19-21?
- Section on “neighborhoods” lists just one. It should list both or neither.
- Section on Title VI. Please use the words, not the name of a legislative bill. (Most people don’t know what Title VI is – can’t you tell us here?) This section has too many sub-sections. Should list just the main topics. I think they are “Environmental Justice” and “Limited English Proficiency” (NOTE: pages 23-29 are very unclear -- what are the main headings, and what are the subheadings? Is page 28 still about LEP? If so, better say so in the title.)

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Please **review your use of word « media »** throughout this document. Some problems:

- “Media” is plural. Example: page 20, 4<sup>th</sup> bullet should say “These media ...”.
- On page 19, I was expecting a bullet on Social Media (probably should move section from page 21 to here)
- Page 20 “In the media” – what media are you referring to here?

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**Pages 25-26**

Please reconsider the chart on page 26. The present chart implies that

- only low-income groups need or use or will ever use public transit
- seniors do not need transit-accessible meetings
- disabled people do not need accessible meetings
- “public assistance” is a different group from “low income”

**Suggestion: Omit the chart altogether.** Just give a list of the groups. Let them decide later what applies to them.

Other ways to make all your meetings and all your information accessible to all area residents:

- hold dozens (hundreds?) of sessions throughout the year

- plan meetings at many times and at many places (so that seniors, working adults, teenagers, unemployed, etc. can be there)
  - be sure meetings are always reachable by public transit – at the beginning time and at the end time also
  - make all your materials easy to understand (pre-test them in advance with real people, or with the “Fog Index, or with Strunk & White criteria for clear writing). NOTE: Even the members of the CTAC and the HRPTO will appreciate this effort! Contact me if you have questions: [judithevansb@yahoo.com](mailto:judithevansb@yahoo.com)
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**Final section. “Our Core Programs”**

Please be clear – are you presenting programs, projects, or plans?

Pages 33 and 34 seem to use the words interchangeably, but surely that is not what you meant to do.

Don’t they have very specific meanings in government-funded programs?

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Staff Response

Ms. Brown. Thank you for your comments on the Draft 2012 Public Participation Plan.

In response to the questions asked in your comments:

1. The Table of Contents in the draft version of the Public Participation Plan is now complete, and will reflect the all of the sections and updates made to the plan during the public comment process. As staff continued to work on the plan during the public comment period, no changes were made to the table of contents until all comments were received. Additionally, the Table of Contents in its draft form was in fact, incomplete.
2. The HRTPO followed guidelines and examples provided by the Federal Highway Administration and the Federal Transit Authority as they pertain to Title VI. Although we do not provide a translation for Title VI within the text of the PPP itself, it is clearly defined as Title 6 in the Glossary of Terms, located in the back of the document.
3. Page 28 of the document, referencing “Four Factor Analysis” , is preceded by the following text: “In developing the HRTPO LEP Plan, the HRPTO staff undertook a USDOT Four-Factor LEP Analysis, which considers the following.....”
4. The Section of the PPP entitled “Core Programs” describes our LRTP and our TIP. Both are programs.
5. The PPP does outline the fact that meetings are held in diverse locations that are accessible by public transit. We go further to say, that we hold meetings at times that are convenient to the public at hand. However, your comments point to the fact that we needed to expand this language. The final draft does contain a fuller picture of our approach towards meetings, and includes an overview of our new Public Meeting Places map, which provides information about our meeting locations, accessibility, transit routes, etc.
6. Facebook is listed under Social Media, on page 26 of the draft PPP.
7. We thank you for your support as we move ahead with making all HRPTO materials as clear, engaging and understandable as possible.

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**HRTPO Public Comment**  
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**RE: 2012 Draft Public Participation Plan**

**Name:** Mr. Tripp Pollard, Mr. Travis Pietila  
**Date:** December 5, 2012  
**Subject:** 2012 Draft Public Participation Plan

**Public Comment Input (Via E-Mail)**

Dear Ms. Miller:

The Southern Environmental Law Center (SELC) appreciates the opportunity to provide the following comments on the Hampton Roads Transportation Planning Organization's (HRTPO) draft Public Participation Plan

SELC is a non-profit, non-partisan organization that works throughout Virginia to promote transportation and land use decisions that protect our natural resources and quality of life, and our Land and Community Program promotes smarter growth, sensible transportation choices, community revitalization, and open space conservation.

HRTPO's draft Public Participation Plan has a number of positive elements. We applaud the Plan's discussion of the importance of public participation and its focus on "mutual problem solving and understanding" and "two-way communication" between decision-makers and the public. We appreciate HRTPO's continued efforts to promote participation and awareness amongst traditionally underserved and underrepresented communities, such as minority, low-income, low-English proficiency, student, and elderly residents, as well as its introduction of individual community-specific strategies in the draft Plan. We also appreciate the draft Plan's promotion of an "environmentally aware and multi-modal approach" to transportation planning, and its commitment to "exceed federal requirements as they pertain to public involvement."

SELC hopes the additional comments provided below will help strengthen this document and ensure that the public has sufficient information to participate meaningfully in the transportation planning process.

**General Organization**

The current Plan's organizational structure has some key benefits over the draft Plan. The current Plan includes a helpful Table of Contents, which can quickly direct the public to a particular area of interest. In addition, the earlier portions of the current Plan are devoted to explaining key entities and planning documents, which provides helpful background information for the public to have before getting into specific public participation strategies. For example, page 18 of the draft Plan notes that HRTPO staff distributes meeting agendas and public notices associated with the "LRTP, TIP, PPP and UPWP," but none of these acronyms are previously defined or described earlier in the document. The Long-Range Transportation Plan (LRTP) and Transportation Improvement Program (TIP), two of HRTPO's most important planning documents, are not described until the final two pages of the draft Plan, and appear to be

included within the “School Outreach” section. We recommend moving this important information earlier in the Plan and/or inserting a new section divider in this area.

In addition, although we applaud HRTPO’s introduction of individual community- specific public participation strategies, we recommend moving these community snapshots to later in the document, so that the public can better understand how the general strategies outlined in the Plan’s various sections have been narrowly-tailored to the individual community examples.

### Specific Information

Regarding the specific contents of the document, we note that the current Plan contains considerably more information about the various participants in the transportation planning process and the various transportation planning documents (*see* current Plan Sections 1 and 2). We understand HRTPO’s desire to reduce the Plan’s bulk and make it more accessible to the public, but we believe this basic information is necessary for the public to adequately understand the complex transportation planning processes and the public’s various opportunities to participate in these processes. Inserting a Table of Contents would help the public to navigate this Plan, avoiding more technical and detailed information if they wish, while retaining this vital information. It may also be helpful to include a graphic timeline of a transportation project’s path through the planning process to help the public identify key decision points at which they can participate.

Noticeably missing from the draft Plan is any discussion of the important air quality conformity analyses HRTPO is required to conduct for its transportation plans, which are described in some detail in the current Plan. As you know, the HRTPO region remains an air quality “maintenance area,” and thus continues to fall under the Clean Air Act’s conformity requirements. Air quality is of great concern to the public, and it is important that the draft Plan continues to acknowledge this important process and opportunity for public involvement.

The current Plan also includes specific information excluded from the draft Plan about public review and comment periods for the LRTP, TIP, regional air quality conformity analyses, and other HRTPO reports and studies, and when public review is proper in the case of a modification or amendment of transportation planning documents. This clarity is important to ensure the public knows what to expect from the transportation planning process, and to ensure that the public has ample time to review and comment on planning documents and actions, which are often very complex in nature.

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### Other Comments

- On page 21, the section’s introductory page is entitled “Title IV and Environmental Justice,” rather than “Title VI.”
- On page 23, the draft notes that “HRTPO has developed an analysis of the Four-Step Environmental Justice Evaluation and is currently working on the 2013 Title VI Methodology,” but nowhere does the draft explain what these are.

- On page 32, the second paragraph's discussion of the 2034 and 2040 LRTPs is somewhat muddled. We recommend clarifying that the *process* to create the 2040 LRTP began in July 2012, and that the techniques listed pertain to the prior 2034 LRTP. This would be helpful to clarify that the public process for the 2040 LRTP is still ongoing.

We appreciate your consideration of these comments, and we would be glad to discuss any of these points with you further.

Sincerely,  
Trip Pollard  
Director, Land and Community Program  
Travis Pietila  
Land and Community Associate

**Staff Response:**

*Mr. Pollard and Mr. Pietila, the staff of the HRPTO extends its gratitude for your review of the 2012 Draft PPP. We appreciate your observation that the HRPTO strives to reflect the diversity and uniqueness of Hampton Roads while designing our Public Involvement approach. Your comments on the general organization of the document have been taken into consideration and further, the final document does reflect some of the Southern Environmental Law Center's suggestions, particularly as they relate to the inclusion of Air Quality in the 2012 PPP.*

*The Draft PPP utilized a rough organizational scheme that has since been refined as the document has gone through different iterations. While the Public Comment Period for the PPP was open, the document was being reworked and therefore, the Table of Contents was constructed loosely for the draft period.*

*The PPP is one is a series of information materials made available to the public. In particular, the PPP goes hand in hand with the publication, "A Citizen Guide to Transportation". That document clearly outlines the HRTPO's projects and programs and covers the Long Range Transportation Plan and TIP extensively. The Citizen Guide also outlines opportunities for public involvement throughout the four-year LRTP development process. The TIP is outlined in the same manner. In addition to these 2 subject areas, the Citizen Guide to Transportation covers all of the major programs and projects undertaken by HRTPO staff.*

*The purpose of the Public Involvement Plan is to illustrate how the HRTPO engages the public in general. While specific examples are given, the general aim of the plan, is to outline the fact that the HRTPO engages in a transparent, open public involvement process. With that said, we thank you for your suggestions regarding the 2034 and 2040 LRTP's and did work to make the language more clear an illustrative of the fact that the public involvement opportunities are available during the entire four-year LRTP development process.*

*The addition of the “Neighborhoods” section to the PPP is to illustrate to the public that the HRTPO is aware of and stands in celebration of, the unique and diverse communities throughout the Hampton Roads Region. In no way, is it intended to serve as a guide for how to conduct outreach in specific communities. While we do understand that specific techniques to reach particular populations do exist, we are also aware of the fact that communities consist of a combination of populations.*

*Your comments on Air Quality Conformity are greatly appreciated, and although this is covered extensively in A Citizens Guide to Transportation, we have added that information to the PPP as well. Additionally, the EJ section of the PPP was expanded to include an overview of the Title VI Methodology, which is currently in the FY 2013 HRTPO UPWP.*

*The Acronyms List is located in the back of the PPP and does include the terms you outlined in your comment (LRTP, PPP, FHWA etc.).*