

Chapter III

Achieving Meaningful Public Engagement With Environmental Justice Populations

One of the guiding principles of environmental justice is to ensure the full and fair participation by all potentially affected communities in the transportation decision-making process. It is important that you develop and use public engagement efforts to encourage environmental justice populations to participate during the planning and implementation of transit projects.

Public Engagement Helps You:

- Identify transit needs of EJ populations and set priorities
- Identify proposed project's benefits and burdens
- Identify mitigation measures

By ensuring that environmental justice populations are engaged in the decision-making process, you can develop transportation plans, programs, and projects that will address the transportation needs of environmental justice populations and will include their priorities. Having done so, you will be in a better position to develop transportation plans that are fair across all levels of society, particularly when establishing the priorities under limited available funding for transit projects. Understanding the needs and priorities of environmental justice populations will also help you to balance the benefits of the proposed project against its adverse effects. This partnership with environmental justice populations

will assist you as you consider options to avoid, minimize, or mitigate disproportionately high and adverse human health or environmental effects. Moreover, with a robust and inclusive public engagement program, you will be in a better position to know whether your plans or projects as implemented will prevent the denial of, reduction in, or significant delay in the receipt of benefits by environmental justice populations.

In this chapter, we identify strategies and techniques for effective public engagement of environmental justice populations that may be used during the planning process and NEPA review. This Circular contains practical suggestions designed to help you develop a strategy for outreach and public participation that is designed for the unique environmental justice populations in your community. We have tried to go beyond the traditional methods of public outreach to incorporate innovative approaches that leverage the ever-changing communications environment in which we live. As you consider whether these non-traditional methods will be effective for engaging underrepresented

populations in your community, neither underestimate the prevalence of electronic media with all segments of society, nor forget the effectiveness of “low tech” communication methods such as hanging posters or handing out flyers. Finally, we recognize that public outreach strategies used in any particular instance must be tailored to address the scope of the proposed plan, project or activity, the population of the planning or project impact area, and your resources available for public outreach.

The strategies and techniques discussed in this chapter are suggestions, and the discussion is not meant to be exclusive or exhaustive. You are in the best position to know which strategies will be effective for your specific situation. Also, you are likely to develop other techniques that will more effectively reach the members of your community. We encourage you to use those techniques, as you know your community better than anyone else.

A. Public Engagement as Part of Transportation Planning

Public engagement is integral to good transportation planning. Without meaningful public participation, you risk making poor decisions, or decisions that have unintended negative consequences. With it, it is possible to make a lasting contribution to an area’s quality of life. Public engagement is more than an agency requirement and more than a means of fulfilling a statutory obligation. Meaningful public participation is central to good decision-making on transportation planning.

As you develop your public engagement strategy, we recommend that you keep in mind the requirements of the joint FTA/FHWA planning regulations, which provide greater detail and definition for public engagement. The statutory and regulatory framework creates a proactive program of engagement, interaction, and accountability involving decision makers, interested parties, and the public, including environmental justice populations. FTA/FHWA joint planning regulations require you to seek out and consider the needs of those traditionally underserved by existing transportation systems, such as low-income and minority households, who may face challenges accessing employment and other services.

The fundamental objective of public engagement programs is to ensure that the concerns and issues of everyone with a stake in transportation decisions are identified and addressed in the development of the policies, programs, and projects being proposed in their communities. For many of you, engaging EJ populations in the transportation decision-making process is a standard part of your overall public engagement plan that is integrated throughout the process, from the earliest stages (long-range planning, visioning, and scenario planning) through project implementation (construction, operation, and on-going evaluation).

Effective public engagement strategies typically are designed to eliminate barriers to active participation by all members of the community, including EJ populations. Strategies should also create constructive, productive dialogue that will lead to practical decisions that benefit all members of the community, including low-income populations and minority populations. Responsive transportation plans and projects that are designed to serve the needs of all members of the community involve not only the expertise of transportation planners, traffic engineers, urban designers, architects, and other professionals, but also include the views and ideas of the public as collaborators and experts with their own experiences and visions for the future.

Additionally, it is important that you follow the requirement in the FTA/FHWA planning regulations that call for periodic review of the effectiveness of your public engagement process, and the procedures and strategies contained in the participation plan, to ensure a full and open participation process. This review would include revisions to the process, as appropriate.

B. Getting to Know Your Community

The effectiveness of your public engagement plan will depend on how well you know the members of your community. This means going beyond the numbers in the demographic profile, and learning about the individuals in your service area, including members of EJ populations, and finding out what is important to them.

Although we use the term “EJ populations” throughout this Circular, you should in no way infer from that term that there is only one way to communicate with all minority populations and low-income populations. For example, communication techniques that may be effective for engaging African-Americans who live in a densely populated urban area in the Northeastern United States may not be effective for engaging African-Americans who live in a rural area in the Midwest. Similarly, how long members of a minority group have lived in the United States may affect the way you communicate with that community. We recommend that you include strategies that address the needs of limited English proficient (LEP) persons as appropriate to ensure compliance with Title VI. FTA’s Title VI Circular and DOT’s policy guidance on LEP are good resources for you to review.

Know Your Community

- Where do they work?
- Where do they relax?
- What languages do they speak at home?
- How do they get their information?

Analyze the public engagement you have used in the past to see how effective it was. The more you know about the values, traditions, and histories of the communities that make up

your service area, the more you can tailor your public engagement for these groups. A good place to start getting to know your community is by reviewing the customer comments you receive through surveys, comment cards, and other techniques. You also may want to search the Internet for blogs or websites about public transportation in your community.

C. Traditional Public Outreach

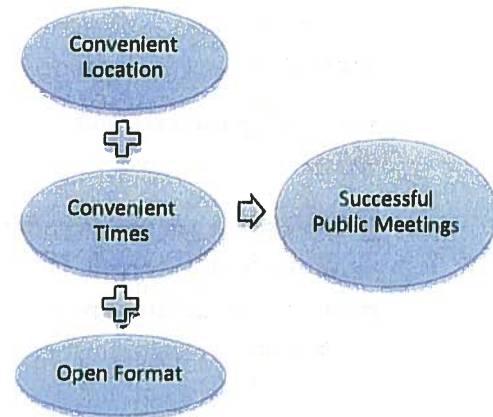
You are probably familiar with the formal public outreach required by Federal, State, or local law for certain transportation decisions (*e.g.*, public meetings on annual budgets, long-range plans, service reductions or fare increases, etc.). Required notice and comment periods are intended to generate comments for an official docket, which is a reliable and organized method for collecting and documenting public input. Public meetings, listening sessions and community forums can provide a good baseline for public engagement campaigns when they are well-facilitated and supplemented with more interactive approaches.

You can make these processes more inviting and user-friendly by writing clear, concise, and understandable documents, and by clarifying the ways for members of the public to provide comments on proposed transportation plans and projects. You will want to provide opportunities for EJ populations to analyze proposals, submit additional data, and provide comments. This can be achieved by scheduling a series of interactive outreach sessions during the notice and comment process, and by making the comments received during those sessions part of the public record. It is also possible to utilize interactive and collaborative online technologies, such as social networking, blogs, videosharing and wikis, to generate increased awareness of, and interest in, the notice and comment process.

For long-range plans, significant capital projects, and other major decisions, it is worthwhile to explore more resource-intensive and in-depth engagement opportunities, including visioning and scenario planning workshops and other collaborative processes. These events can be scaled up or down according to the resources available to support them. Workshops draw members of the public together and expose them to the complexity of plans and projects and the tough choices to be made. It is important to recruit members of EJ populations to participate in community-wide events. Additional events specifically designed to target EJ populations also may be appropriate in some situations.

D. Hosting Successful Public Meetings

Many agencies rely on formal public meetings as the foundation of their public engagement plan because such meetings are often required under Federal, State, or local laws. These types of meetings can be effective, particularly if you are well-prepared for the meeting, adequately publicize the meeting, and hold it at a convenient time and location. These required public meetings, hearings or comment periods are the minimum requirement to meet specified legal requirements and should not constrain your public engagement strategy. The most successful public meetings will follow a series of more informal meetings with community groups and smaller gatherings of community members.



FTA/FHWA joint planning regulations include requirements for where to hold public meetings and the methods of engagement to use. For example, under Federal regulations, you are required to:

- Hold public meetings at convenient and accessible locations and times;
- Employ visualization techniques to describe plans; and
- Make public information available in electronically accessible formats and means, such as the World Wide Web.

Consider the **location** of the meetings, including whether to hold the meeting in a location that serves the interests of EJ communities, such as community centers, social service organizations, or local schools.

- Is the meeting in a convenient location that is easily accessible by public transit?
- Is the room large enough and comfortable?
- Is the location accessible to persons with disabilities?

The **timing** for the meeting should be designed to allow maximum participation by EJ communities.

- Consider work schedules, school schedules, rush hours, meal hours, and religious worship hours when setting the date and time for the meeting. You may want to schedule more than one meeting and to vary the times of meetings.

- Consider whether your community might prefer meetings scheduled for early mornings or weekends.

You should consider the *format* of the meeting to allow maximum input.

- Develop a meeting format that allows everyone to participate if they want to. This may mean setting reasonable time limits for speakers so that a few individuals do not monopolize the meeting.
- Limit your own comments. The purpose of this meeting is to hear from the public.
- Be willing to adapt the room set-up to accommodate the attendees. For example, if you expect 100 people to attend a public meeting, that may require a traditional public meeting set-up (a head table, a podium and rows of chairs, and regulated by an agenda and a three-minute speaking limit). A meeting with a smaller group may be more informally arranged.

Make the public participation process *accessible to all*.

- Designate a specific employee to accommodate the needs of persons who are linguistically and culturally isolated, as well as persons who have disabilities. You may have obligations under Title VI to provide assistance to persons who do not speak English well or at all.
- When planning accessible public engagement campaigns, it is vital for agencies to consider that people have different learning styles, educational attainment levels, and literacy skills. Therefore, it is a good idea to go beyond the auditory nature of public meetings to include visual and tactile tools and techniques in the overall public engagement strategy.

Communicate clearly during the meeting.

- Assess a group's preferred types of communications prior to the meeting.
- Clearly explain the purpose of the meeting and the steps in the process, including the proposed schedule.
- Provide information in plain language. Make sure technical information and complex policies and procedures are described in layperson's terms rather than jargon.
- Spell out acronyms and define technical concepts and terms; Federal, State, and local transportation planning processes are complex.
- Break the plan or project into pieces; plan public sessions that focus on one part or section at a time.

Finally, you will need to provide notice to the community, including EJ populations, about the meeting to encourage people to participate. Check Federal, State, and local requirements to be sure that you comply with any formal publication or notice requirements. For example, your State's open meetings law may require that you provide notice in certain specified media 48 hours before the meeting. These requirements establish the minimum that must be done for providing notice. We recommend that you use other methods to provide notice to the public.

People generally expect that government entities will post on their websites electronic versions of major action documents, such as proposed transportation plans, NEPA review documents, public engagement plans, and actions by its governing board. If you do not already do this, we recommend that you consider implementing such a practice as soon as practicable.

In addition, Federal, State, or local law may require that documents that require an official comment period and administrative record (such as a draft environmental impact

Effective Notice

- Required Notice
- Signs on Transit Vehicles, Stations, Stops
- Email Blasts
- Social Networking
- Notice in Ethnic or Community Media

statement) be made available for public review at your office and other public offices that are open to the general public, such as libraries, community centers, etc. We recommend that you make these documents available in locations that are easily accessible by members of EJ populations. That location may not necessarily be your main offices. At a minimum, you may want to consider making documents available at local public library branches which may be open evenings and weekends and are in locations serving EJ populations.

Where appropriate, we recommend that you develop signs or other materials to post or distribute. Although signs may be placed in a static location, they can be an effective means for reaching targeted audiences who use that location regularly. For example, if you want to reach your customers to let them know about a meeting, project, or service proposal, consider placing signs on the inside of transit vehicles, at bus shelters, or in transit stations. These ads and signs can be designed for visual impact and often draw wider interest than formal legal notices. Other techniques include purchasing billboards in EJ communities, providing information kiosks at community events, and providing storefront displays. The key is to let the community know about the issue under consideration and your desire to have them participate before a final decision is made.

In addition to meeting with the public face-to-face, we recommend that you include the use of traditional and non-traditional media as part of your public engagement strategy. Traditional media include your website; local newspapers, radio, and television stations. It also includes leveraging and your transit assets, such as signs on buses, trains, stations, and bus shelters.

We recommend that you do not rely solely on “official” notice methods, but that you consider other cost-effective ways to reach members of your committee. Particular EJ populations may read or listen to ethnic media that are delivered in native languages and provide information about public and cultural events occurring in the community. These media may also provide opportunities for inclusion of news articles or editorial comments from their point of view. Use of ethnic media can help you tailor your communication, message, and voice.

We also recommend that you consider radio or television advertisements that serve LEP populations. You may want to undertake marketing research to ensure the media buy targets the appropriate environmental justice market with the correct media message. Outreach to LEP populations could include audio programming available on podcasts.

E. Non-Traditional Outreach

As discussed above, Federal, State, and local law may establish the minimum required for you to comply with legal requirements for public engagement and notice. You should not, however, let these minimum requirements limit you from using other methods to engage the public. Rather, we recommend that you identify other ways to engage the public that may be less formal than a public meeting or formal listening session. For example, consider attending meetings held within the community or organized by local



advocacy groups or faith-based coalitions. Consider non-traditional media outlets, such as local, neighborhood publications, or internet outlets, such as YouTube, Twitter, or Facebook. New ways to reach large numbers of the public are emerging almost daily, and we suggest that you consider whether any of these methods will work for your community.

1. Informal Group Meetings

Seek out opportunities to attend existing community group meetings, such as neighborhood associations, faith-based coalitions, and advocacy groups. Just as the downtown business coalition will meet with the decision makers to provide input into the process, we recommend that you provide similar opportunities to EJ communities early in the process. Waiting to bring EJ communities and decision makers together in the same room until the first public meeting, or until the final decision, is not as effective as engaging with them early on. Decision makers benefit from public comments and ideas while there is still time to suggest and discuss alternatives, and it gives the public the opportunity to influence the decision-making process.

One strategy for meaningful engagement is to approach differing viewpoints between you and the community in a non-traditional fashion. Conflict often presents an opportunity to become aware of community priorities. Identify and learn from past practices that have resulted in disagreements or misunderstandings between EJ populations and your organization. Challenges will often arise when transit agencies and planning “experts” tell a minority or low-income community what is best for it. Instead, try carefully listening to the community’s concerns. Often times, they support the specific project proposed, but are concerned about other issues such as service reliability or safety. Do not take a defensive posture. Acknowledge the short-comings of your transit operations or the plan. Most importantly, be honest about the community concerns you can address and those you cannot. Too often, conflicts surrounding a transit project or changes in service stem from longstanding trust issues between the community and the transit operator. *Remember: Building trust and confidence in your transit system will not occur overnight.*

You develop trust from these meetings by promptly following through on commitments made during meetings. It’s helpful to acknowledge the contribution of the public in the decision-making process and explain the reasons for the decision.

2. Digital media

As a result of technological advances, there are many new and very cost-effective methods for communicating with the public that go well beyond posting legal notices and documents to your website. You can use digital media to engage people not just during public meetings or business hours, but at any time of the night or day. These tools can be used to reach out to people whose schedules do not allow them to attend meetings, to those who are intimidated or put off by large government-sponsored meetings or hearings, and to those who prefer to deliver their comments in writing rather than in person. Also, consider leveraging digital communications that can be used on personal mobile devices such as mobile phones or smartphones. While not all members of EJ populations have

convenient access to a computer, researchers have identified high rates of mobile phone and smartphone use amongst EJ populations. Thus, the use of “blast” public engagement information via text messages can be an effective way to reach your target audience.

Social media (*e.g.*, YouTube, Twitter, Facebook) can also be an effective tool for creating a forum for public dialogue. Social media can be accessed on mobile devices, as well as on laptops, desktops, and some video game consoles and televisions. This level of accessibility makes social media ideal for broadcasting information and questions, and generating comments, virtual conversations, increased visibility, and excitement (especially when a posting “goes viral”). Consider recording in audio and visual formats presentations about your transportation plan or project and posting the digital file not only on your website but on YouTube, iTunes, and other outlets.

Another way to incorporate new voices and ideas into the transportation planning process is through crowdsourcing, a form of distributed problem solving. This technology allows community members to contribute to the design of something like a bus stop or a transit center. Transportation plans and projects can be discussed over longer periods of time via Web-based discussion forums including webinars, webcasts, wikis, and online dialogues. These platforms create structured, moderated opportunities to engage in two-way communication, from any location at any time of day. Interactive and collaborative online technologies are becoming increasingly accessible and affordable to the public at large, including EJ populations.

3. Direct Mail Campaigns

You may want to consider developing shorter information pieces, such as fliers or handbills that can be distributed by direct mail, or at bus stops, rail stations, community events, or other places where large numbers of people gather. By forming partnerships with local businesses or community-based organizations, you may be able to distribute written materials through direct mail campaigns, utility bills, and school bulletins, and at other key locations. These organizations can also help you develop a list of members or organizations from the EJ community.

4. Community Led Events

You can also cast a wider net by creating public engagement opportunities for groups. Effective techniques in this realm include hosting a table or booth at a community event or piggybacking an engagement effort onto a regularly-scheduled community meeting. It can also be productive to conduct discussions including focus groups and roundtables; many agencies offer modest incentives (*e.g.*, stipends, refreshments, child care, transit passes) to

those who attend. Many transit operators and planning agencies have found that these adjunct approaches can increase the ability of EJ populations to participate in activities.

5. Partnerships with Community-Based Organizations and Leaders

We recommend that your outreach strategy include building relationships with community-based organizations who serve underrepresented populations. You can partner with community-based organizations to hold meetings, facilitate discussions, and work with the leaders of these groups to obtain feedback on your public engagement plan. Consider how you can combine forces and resources with agencies that share a mission to interact with specific populations. Community leaders are ideally positioned to champion the public engagement process and disseminate information to their constituents and members during the course of their day-to-day activities.



Encourage your staff to become familiar with local environmental justice networks and environmental justice organizations at the local, regional, state, and national levels. It can also be effective for you to partner with educational institutions including elementary and secondary schools, community colleges, and universities that traditionally have served minority or low-income populations. Staff at these institutions can often provide access to communities, neighborhoods, and groups.

You may choose to create a Community Advisory Council (CAC) or a task force that focuses on a specific project or on the needs of specific populations (low-income, minority, and/or transit dependent persons). Transit providers often appoint one or more members of EJ-focused organizations to their transportation planning board. Significant public outreach is encouraged to ensure the communities are well represented on the committee. However, we do not recommend that you rely on a CAC or transportation planning board as the sole method for engaging EJ populations because members may not represent the diverse viewpoints of the EJ community.

Community outreach coordinators who have extensive knowledge of the EJ populations you are targeting, relationships with community leaders within that community, and the

cultural and linguistic competency may be helpful when engaging EJ communities in your planning or project management team. These outreach practitioners have a rich understanding of ways to effectively communicate with and build relationships with EJ populations, which often enhances trust and rapport.

By engaging community leaders, community advocates, and community advisory councils, you will be better able to develop strategies that not only make your traditional public engagement activities more effective, but also help you develop other non-traditional methods for engaging the community in your transportation planning and project implementation activities. These traditional public outreach methods are important, but should not be used exclusively. Rather, we recommend that you strive to develop a robust public outreach strategy that engages all members of the community, including members of EJ populations.

F. Summary

No single tool or technique can create effective interaction between the public and decision makers; each transit operator, State DOT, or MPO will achieve this goal differently, depending on the preferences of its decision makers and on its organizational structure, community history, public engagement culture, and demographic characteristics.

A robust public engagement program that meets the particular needs of the community relative to the plan, project, or decision under consideration is important. We recognize that you may not be able to resolve every issue or concern raised by the EJ community or that every need or request can be met. However, we recommend that you work diligently to engage in a meaningful public dialogue with the EJ populations impacted by your plan, project, or decision by listening to what they have to say, respond to their comments and concerns, and incorporate their comments into the transportation process where practicable.

Engaging EJ populations in the decision-making process should not be regarded as “extra” or “special” effort; rather, public engagement of underrepresented groups such as EJ populations is the cornerstone to an inclusive and effective public engagement process.