

TSK 458–c: Augment the Public Involvement Plan:

When an EJ population has been identified on your project.

See also: [EM Chapter 458](#), [ESO Discipline Specialist](#)

Effective: April 2011

Objective:

“The full and fair participation by all potentially affected communities in the transportation decision-making process” is one of the three fundamental concepts of Environmental Justice as outlined in Presidential Executive Order 12898. Development of a Public Involvement Plan (PIP) and documentation of its execution and affect on the project is necessary to show that WSDOT has met this requirement.

The PI Plan should enable you to describe how the EJ population views the project. A robust PI Plan, tailored to your EJ population and supported by good documentation can demonstrate public support for the project; compliance with legal requirements to consider EJ population’s needs, and justify a finding of “no effect”.

This task assumes that you have already used the guidance provided in the WSDOT Communications Manual to develop a PIP for your project. The steps outlined below are intended to be used to augment the basic PIP.

Start task: When you determine that an EJ population exists in your project area -- TSK 458-b.

End task: Redesign of the PI plan to address EJ and Limited English Proficiency (LEP) populations.

1. **Re-evaluate the PI budget.** At the very least you will need additional time and money to enable staff to demonstrate that the original Public Involvement Plan is adequate and meets the intent of EO 12898. You may also need to allocate additional funds to provide for targeted outreach, translation services, printing of foreign language outreach materials, tracking of public comments and responses, development of a risk management plan to allow for evaluation and adjustment of the PI Plan.

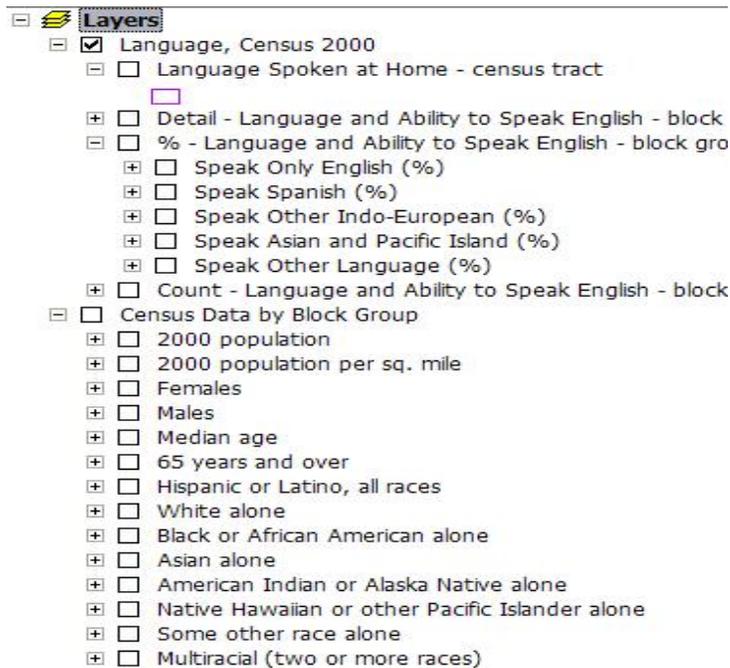
The PI Plan will need to be adjusted to:

- Describe the strategies that will be used to involve EJ, low-income and LEP populations.
- Determine if translators will be needed.
- Demonstrate that meeting locations are accessible and reasonable for the EJ, low-income and LEP populations.

- Show timelines for when activities will take place and demonstrate that the EJ, low-income and LEP populations will receive project information in a timely manner.
- Include a process for evaluating the effectiveness of the PIP and develop contingencies for reasonably anticipated problems (such as a lack of participation by the EJ population).
- Document how the EJ, low-income and LEP population responded to the project and proposed mitigation. And how their responses are reflected in the project design.

2. **Determine if translators will be needed.** WSDOT does not use a threshold percentage to determine when translation services will be provided. We are required to provide equal access to the information for all citizens. The decision to provide translation services is the Project Manager’s decision based on an understanding of the project and information collected from the resources listed below.

- Demographic data (GIS Workbench data layers for the US Census used in TSK 438-b) will show the number and types of language spoken by census block. Review data for “% - Language ability to speak English”, then sort by language subgroup.



- Documented best practices -- interview local officials and social service providers. Do they use translation services when working with this community? Does local school district language proficiency data suggest that translation services will be needed?

- You do not need to print the environmental document (EIS/EA) in a foreign language, but you must provide a translator upon request. Consider printing foreign language translations of project newsletters, fliers and basic project information to provide equal access to information. Review guidance on [Limited English Proficiency](#).
3. **Evaluate PI strategies and adjust the plan.** Include a system for evaluating and adjusting the PI plan in the project schedule and budget. The evaluation should address the following issues:
- Is the entire project community participating in PI activities? The Title VI reports should reflect the EJ population. If translated documents are provided track how these resources are being used (number of copies distributed, number of requests for assistance by foreign language speakers). If printed foreign language materials are not accepted, look for alternative methods of communication.
 - Are communication techniques working? This may be determined by the number of people attending meetings and the appropriateness of comments received. Are they relevant to the project? Do they illustrate a reasonable level of understanding?
 - Are there significant persistent unresolved issues? Document the issues and source of the comments. Document actions taken to resolve issues and communicate solutions. Document PI strategy sessions, attendees, topics discussed and resulting changes to the PIP.
4. **Document the effectiveness of the PIP.** This documentation can be used in the environmental document to meet the requirement for effective and inclusive public involvement.
- Collect all Title VI forms. Analyze and record the number returned and the populations that attended each event.
 - Retain copies of all meeting materials, press releases, brochures, web pages, traffic to the project web site, and public comments.
 - Set up a tracking system and track comments, responses and who responded. Summarize the issues.
 - Document how the project, mitigation, alternatives changed in response to public comment. If specific changes were made in response to address impacts to the EJ population, document the source of the request and the nature of the change.
 - Describe EJ outreach strategies, their effectiveness and how they changed over time.
5. **Document results of the public involvement by location.**
- Create a tracking system to record comments and issues of concern by location or EJ neighborhood. This will be important for the effect determination in TSK 458-d.