



## **East Tennessee Human Resource Agency**

### **Public Transit Program**

#### **Public Participation Plan (PPP)**

**The East Tennessee Human Resource Agency (ETHRA) Public Transit Program encourages active participation by the public and other interested parties in the development of all transportation plans and programs, particularly the major products. ETHRA believes that the distribution of information regarding transportation planning and decision making needs to be inclusive of as many in the public as can reasonably be reached, and that interested parties and other federal, state, and local agencies should be given a fair opportunity to participate in the planning process.**

**It is the policy of ETHRA to take all public and stakeholder comments into account in the development and adoption of plans and programs. The processes outlined in this document form the basis for providing the opportunity for the general public and key stakeholders to participate in the transportation planning process. This Public Participation Plan (PPP) has been developed to meet federal requirements outlined by Title VI of the Civil Rights Act of 1964, Environmental Justice, the Americans with Disabilities Act (ADA) of 1990, and other applicable regulations.**

#### **Title VI**

**ETHRA assures that no person shall, on the grounds of race, color, national origin, income, gender, age, or disability as provided by Title VI of the Civil Rights Act of 1964 and the Civil Rights Restoration Act of 1987 (PL 100.259), be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity.**

**More specifically, ETHRA assures that every effort will be made to prevent discrimination through the impacts of its programs, policies, and activities on minority and low-income populations. Additionally, ETHRA will take reasonable steps to provide meaningful access to services for persons with Limited English Proficiency.**

**ETHRA further assures that every effort will be made to ensure nondiscrimination in all of its programs and activities, whether those programs and activities are federally funded or not.**

**ETHRA's Title VI Coordinator is responsible for initiating and monitoring Title VI activities, preparing required reports, and other related responsibilities as required by state and federal Title VI and Equal Opportunity regulations.**

### **Environmental Justice (EJ)**

**Pursuant to Executive Order 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations, dated February 11, 1994, and the subsequent U.S. Department of Transportation Order 5680.3, issued April 15, 1997, ETHRA promotes Environmental Justice in all aspects of the transportation process. These procedures augment and reaffirm the policy to adhere to and advance the principles of the National Environmental Policy Act of 1969 (NEPA), Title VI of the Civil Rights Act of 1964 (Title VI), the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (URA) as amended, the Intermodal Surface Transportation Efficiency Act of 1991 (ISTEA), Transportation Equity Act for the 21<sup>st</sup> Century (TEA-21) as amended, the Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users (SAFETEA-LU), and other statutes, regulations and guidance that address or affect transportation planning and decision making; social, economic, or environmental matters; public health; and public involvement.**

**ETHRA will identify and address, as appropriate, disproportionately high and adverse human health or environmental effects of Agency programs, policies, and activities on minority populations and low-income populations. Environmental Justice at ETHRA includes incorporating EJ and non-discrimination principles into transportation planning and decision making processes as well as any project-specific environmental reviews when required.**

**The guiding EJ principles followed by ETHRA are briefly summarized as follows:**

- To avoid, minimize, or mitigate disproportionately high and adverse human health and environmental effects, including social and economic effects, on minority populations and low-income populations.**
- To ensure the full and fair participation by all potentially affected communities in the transportation decision making process.**
- To prevent the denial of, reduction in, or significant delay in the receipt of benefits by minority and low-income populations.**

**Public engagement and participation in decision making is a fundamental principle of EJ, and is critical to achieving outcomes that reflect the needs of all affected stakeholders to the greatest extent possible. Unfortunately, too often in the past, low-income and minority communities have borne disproportionately high or adverse human health and/or environmental effects as the result of infrastructure projects.**

**Therefore, ETHRA is committed to engaging low-income and minority populations in the transportation decision-making process, in addition to building relationships with all stakeholders, including those who serve underrepresented populations. Active participation of all affected communities will help ensure that transportation plans and projects avoid, minimize, or mitigate these impacts on low-income and minority populations. For this reason, ETHRA is committed to developing and using public engagement to encourage EJ populations to participate during the planning and implementation of ETHRA programs, policies, and activities. Furthermore, it is expected that coordination with community leaders will expand the public engagement process and ensure dissemination of information to their constituents.**

To these ends, notices of meetings and public hearings will be specifically targeted to minority and/or other groups considered to be traditionally underserved to encourage participation in the transportation planning process. Minority and ethnic communities will be monitored through census data to ensure their inclusion in the process as populations fluctuate over time. In addition, special accommodations (e.g. interpreter, sign language interpreter, large print copy, etc.) to help disabled individuals may be requested of ETHRA during normal business hours at least five (5) business days prior to the meeting, and ETHRA will attempt to accommodate all such requests.

## **Introduction**

This document presents the goals for public participation and involvement, as well as the public involvement procedures designed for various transportation planning activities. The purpose is to provide opportunities for all citizens to contribute ideas and opinions early and at every stage of the planning process.

Efforts will be made in the transportation planning and programming process to:

- Assure participation by traditionally underserved individuals, including elderly, low income and minority individuals, persons with disabilities, and persons with Limited English Proficiency (LEP).
- Ascertain what Non-English languages and barriers exist to provide participation in the service area.
- Provide public meeting notifications in a manner comprehensible to all populations in the service area.
- Provide transportation to public meetings free of charge upon request.
- Consider any and all concerns received from all populations on an equal manner.

## **Identification of Stakeholders**

Stakeholders are individuals either directly or indirectly affected by the plan and/or those who make recommendations to the plan. Those who may be affected or who may be unaware of the benefits of the plan's recommendation(s) are of particular interest in the identification of specific stakeholders.

Stakeholders are broken down into several groups: general citizens, minority and low-income persons, public agencies, and private organizations and businesses.

Techniques such as those listed in the section entitled "Outreach Efforts to Enhance Public Participation and Involvement" are used to engage all populations in traditional and nontraditional methods of involvement. These techniques are followed to gain input, either directly or indirectly; to engage the minority or LEP persons in the process; and to otherwise develop new insights and perspectives from others outside the typical transit environment.

## **Traditionally Underserved Populations**

**Title VI of the Civil Rights Act of 1964 protects persons from discrimination based on race, color, or national origin in programs and activities that receive federal financial assistance. President Clinton's Executive Order 12898 provides further guidance to federal assistance programs to ensure that low-income and minority populations are not discriminated against by Federal, state or local agencies receiving Federal monies. Specifically, the Federal Executive Order directive requires federal programs:**

- **To avoid, minimize, or mitigate disproportionately high and adverse human health and environmental effects, including social and economic effects, on minority populations and low-income populations,**
- **To ensure the full and fair participation of all potentially affected communities in the transportation decision-making process, and**
- **To prevent the denial of, reduction in, or significant delay in the receipt of benefits by minority and/or low-income populations.**

**Because of the importance of an all-inclusive outreach program that ensures compliance with Title VI and the Americans with Disabilities Act of 1990, ETHRA will place emphasis on efforts to reach out to traditionally underserved or underrepresented segments of the region's population including:**

- **Low income,**
- **Minorities,**
- **Homeless or institutionally housed,**
- **Limited English Proficiency (LEP),**
- **Limited Literacy,**
- **Transit Dependent,**
- **Transportation Disadvantaged,**
- **Single-parent Families,**
- **The Elderly**

## **Major Service Change**

The Federal Transit Administration (FTA) requires that recipients prepare and submit service and fare equity analysis for public comment in consideration of proposed major service or fare changes. The purpose of this policy is to establish thresholds that define a “Major Service Change”, and the definition of an adverse impact created by a “Major Service Change.”

East Tennessee Human Resource Agency (ETHRA) defines a “Major Service Change” as any change that affects 25% or more of the number of transit route miles of a route (addition or deletion); or 25% or more of the number of transit revenue vehicle miles of a route, computed on a daily basis for the day of the week for which the change is to be made (either addition or deletion). When a change is determined to be a “Major Service Change”, ETHRA staff will conduct a service equity analysis, according to FTA Circulars 4702.1B and 4703.1, and present the results of that analysis to the ETHRA Board of Directors and/or any other local governing agency that may be impacted when considering approval of said change. A temporary addition or deletion of service (e.g., demonstration projects) or detours are exempt from ETHRA’s definition of Major Service Change. Should the temporary change of service last longer than twelve (12) months, the service change will be considered a Major Service Change, and a service equity analysis will be conducted by ETHRA staff and considered by the ETHRA Board of Directors any other local governing agency that may be impacted.

## **Public Comment Process:**

Although ideas and opinions from all citizens are encouraged during the many stages of the planning process, public comment is especially important when considering a major service or fare change (see definition above). When such a proposal is under consideration, every effort will be made to give as much notice as possible prior to the meeting held to discuss these changes. Under no circumstances will the notice be less than thirty days, and the public participation techniques outlined in this plan will be followed to reach as many affected groups as possible.

Any comments from the public related to a proposed major service or fare change will be given the utmost consideration, and any negative changes to fares or transportation services will be approved only when absolutely necessary and no other alternatives are feasible. Whenever possible, measures will be taken to minimize the effects of any such changes.

## Background, General Information, and Statistics

**General Citizens:** There are over 772,900 residents in the ETHRA service area, with an additional 461,860 in the area's most populous county, Knox (Source: U.S. Census Bureau State and County Quickfacts, July 1, 2017). Approximately 95% of the population in ETHRA's counties consider themselves to be of the white race, while 86% of the Knox County residents consider themselves white.

**Minorities:** Minority populations make up a fairly small percentage of the ETHRA service area. African-Americans make up the largest minority with slightly more than 2% of the total population. Hispanics make up approximately 2% of the population but constitute a fast-growing segment of the population in many of the counties served. Asian persons make up less than 0.5% of the population and Native Americans constitute less than 0.3% of the area. (U.S. Census Bureau Quickfacts, July 1, 2017)

**LEP Populations:** The most recent U.S. Census Bureau data shows that only a very small percentage of the population served by ETHRA's Public Transit Program speaks little or no English. The majority of these individuals are concentrated in Hamblen, Loudon, and Knox Counties, with those speaking English "less than very well" at 3.3%, 2.1%, and 1.3% respectively. Many of the other counties in the service area have statistically negligible LEP populations (Scott at 0.0%, Roane at 0.2%, and Claiborne at 0.1%). [Source: U.S. Census Bureau, 2012- 2016 American Community Survey 5-Year Estimates]

**Low-income:** While the overall percentage of persons below the federal poverty level in Tennessee is 15.8%, the poverty rates in ETHRA's counties of service range from slightly below the state average (11.4% in Blount, 15.1% in Sevier, and 10.6% in Loudon) to significantly above the state's level (24.1% in Campbell, 22% in Scott, 24.2% in Cocke, and 30.9% in Hancock). [Source: U.S. Census Bureau State and County, July 2017]

**Public Agencies, Private Organizations and Businesses:** Public agencies, private organizations and businesses offer a number of perspectives that are valuable to the planning process.

## Public Participation Techniques

This section provides a description of the various techniques that will be used to carry out public participation process. Opportunities for public input are not limited to those contained in this section, and other public participation techniques may be employed to increase the awareness of relevant ETHRA policies, while encouraging public participation in the development process.

### Media

#### Press Releases and Public Service Announcements

In order to broaden the participation in transportation planning decisions, ETHRA will use media press releases and public services announcements to announce opportunities for the public to participate in planning-related issues.

Registered news media and organizations such as major neighborhood groups and/or minority groups on ETHRA's email list will receive all press releases. Public Service Announcements will be distributed to the appropriate media. A special effort will be made to reach traditionally under-represented groups via local media establishments.

#### Newspapers

Notices of all meetings, public hearings, and public comment periods are published in the Knoxville News Sentinel and, when available and appropriate, other local media outlets. Notices are published a minimum of seven (7) days prior to scheduled meetings.

#### Radio, TV, and Other Media Forums

Various TV and radio stations throughout the area offer opportunities for organizations to inform their viewers about upcoming meetings and events. Press releases of meetings are sent to all local radio and TV outlets.

### *Presentations/Meetings/Workshops*

#### Formal Meetings

Formal meetings will be held in ADA accessible facilities in locations served either by fixed-route transit service, or by an on-demand type service. ETHRA will select the location, size, and setup of meeting facilities based on the specific characteristics of the audience and the type of information to be presented.

Public meetings and workshops will be held in areas that offer the greatest opportunity for those interested to participate. As much as possible, ETHRA will hold meetings and workshops in public places (e.g., public libraries, hotel conference center, town center, or shopping mall) that are conducive to attracting the mix of people and businesses most representative of the community.

To encourage the involvement of minority and LEP populations, any required meetings or hearings will be held at locations and times that are accessible and convenient for minority and LEP communities.

For all public meetings, ETHRA will seek to increase participation by creating a welcoming and inviting environment. Furthermore, all meeting agendas contain the following statement:

*ADA Notice: For special accommodations for this meeting, contact Title VI/ADA Coordinator via phone (865) 691-2551, extension 4262 (TTY 711) at least one week in advance.*

### *Other Tools*

#### ETHRA Website

Many people use the internet as their main source of data and information. The physically disabled are especially able to use this source to both receive input and to provide feedback, while not being required to physically attend meetings.

The ETHRA website ([www.ethra.org](http://www.ethra.org)) provides a comprehensive resource to people wanting information about services or activities, public notices of all meetings, and public hearings.

#### Comment Cards

Comment cards will be made available at all public meetings, including project-specific open houses/town meetings to assess priorities and goals.

### *Enhanced Outreach Methods*

ETHRA will work with community and faith-based organizations to effectively reach minority and LEP groups. These organizations will be notified of meetings, hearings, and general program updates, and encouraged to share this information with interested parties.

When appropriate for project-specific meetings, ETHRA will use enhanced public outreach and communications methods for hard-to-reach or traditionally underserved populations. When reaching out to those communities, ETHRA will use simple, straight forward language, incorporating visual aids such as photos, renderings, aerials, and color charts to help communicate complex concepts and plans. Meetings and workshops will be held at locations that are ADA accessible, convenient, and most effective in encouraging turnout and input. In general, facilities will be located close to participants' homes, work or other places they frequent. Potential meeting sites include community churches, local ministries to the poor and/or homeless, public schools, libraries, transit facilities, universities, and shopping facilities.

The following are additional methods ETHRA may use to reach out to special populations:

- ETHRA may use visualization methods (maps, displays, charts, and other static and interactive engagements) to make the topic relevant to the target audience. The extensive use of maps, aerial photographs and simple charts allow for greater participation and understanding by those that may be more visually oriented and will allow for greater interaction by participants.
- If meetings are to be held in areas where there is a predominance of non-English speaking populations, ETHRA will have people available to help translate questions and inputs.
- When appropriate, ETHRA will use community-based TV and radio stations and websites to target messages and solicit input from specific population segments, including minority and LEP groups.

## Title VI and Environmental Justice Resources

### Community Associations, Advocacy Groups, and Media Outlets

American Association of Retired Persons	<a href="mailto:tnaarp@aarp.org">tnaarp@aarp.org</a>
Hispanic Chamber of Commerce of East Tennessee	<a href="mailto:mail@hccet.org">mail@hccet.org</a>
Knoxville Area Urban League	<a href="mailto:info@thekaul.org">info@thekaul.org</a>
Knoxville Chamber of Commerce	<a href="mailto:jevans@knoxvillechamber.com">jevans@knoxvillechamber.com</a>
Legal Aid of East Tennessee	<a href="mailto:twoods@laet.org">twoods@laet.org</a>
Legal Aid Society	<a href="mailto:jmynatt@las.org">jmynatt@las.org</a>
National Association for the Advancement of Colored People	<a href="mailto:info@tnnaacp.org">info@tnnaacp.org</a>
National Federation of Independent Businesses	<a href="mailto:jim.brown@nfib.org">jim.brown@nfib.org</a>
WKGN-AM (Knoxville)	<a href="mailto:psanchez@norsangroup.com">psanchez@norsangroup.com</a>
WKZX, 93.5 FM (Lenoir City)	<a href="mailto:laliderwkzx@gmail.com">laliderwkzx@gmail.com</a>
Centro Hispano de East Tennessee	<a href="mailto:centro@centrohispanotn.org">centro@centrohispanotn.org</a>

*Information and statistics updated May 2018*