

**City of Sierra Vista
Short Range Transit Plan**

Project Management Plan

Prepared for:



**Arizona Department of Transportation
City of Sierra Vista**

Prepared by:

URS

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1.0 INTRODUCTION

The Sierra Vista Short Range Transit Plan (SRTP) will guide the next five years of transit service for the City of Sierra Vista and Vista Transit, the city's transit operator. A map of the current transit network and its surrounding characteristics is provided in Figure 1.

Section 2.0 below lists the study objectives, as discussed during the kickoff meeting with the Arizona Department of Transportation (ADOT), the City of Sierra Vista, and URS. Brief background information and a Work Plan designed to achieve study objectives are provided in subsequent sections. The organization of the study team is described in Section 4.0. A draft schedule for the study effort is provided in Section 5.0, followed by project coordination efforts, progress reporting timelines, and the URS Quality Assurance (QA) procedures.

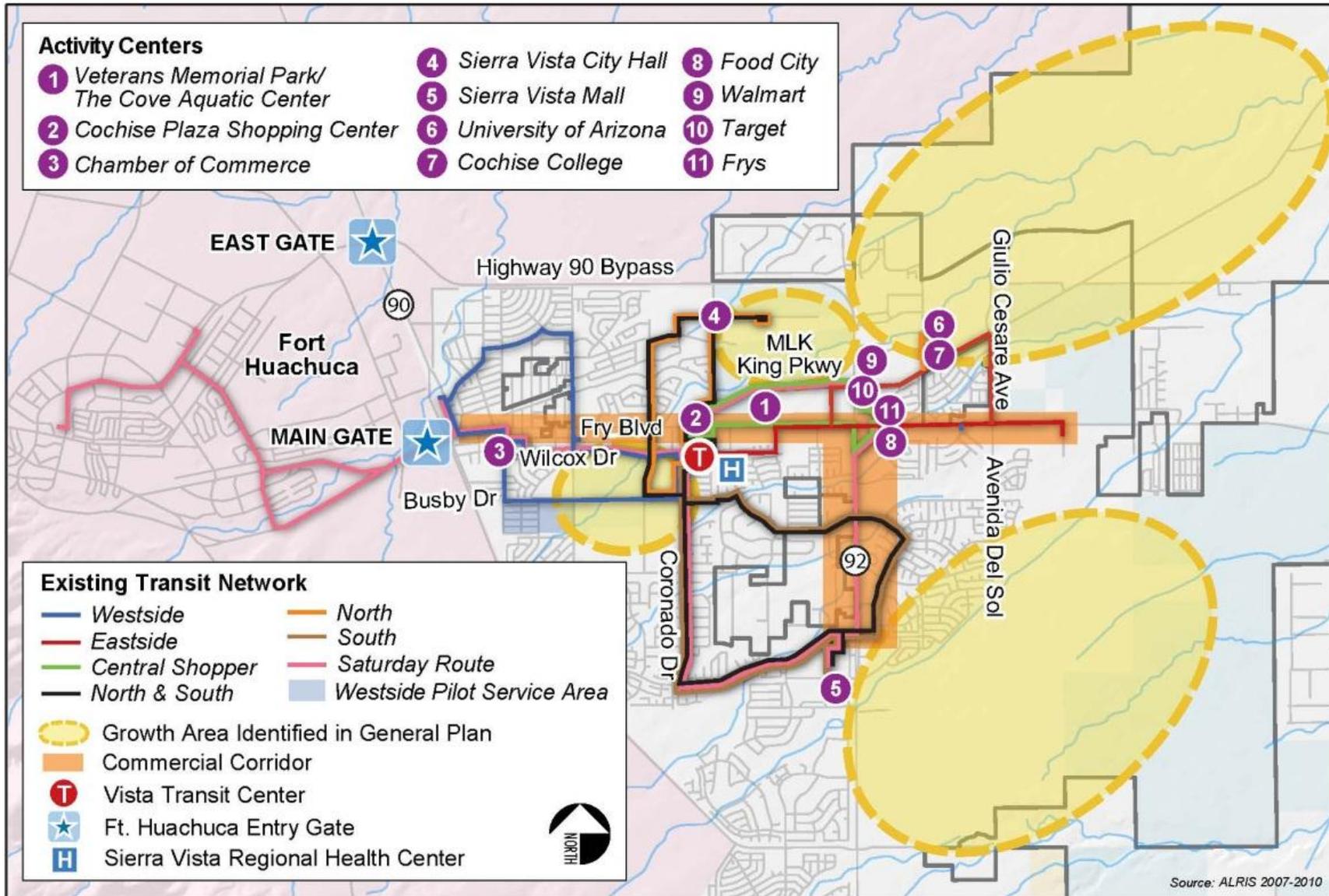
2.0 STUDY OBJECTIVES

The Sierra Vista SRTP is an opportunity to investigate the challenges and opportunities associated with the development of a Metropolitan Planning Organization (MPO) and the transition from the §5311 General Public Grant Program to the §5307 Small Urbanized Area (UZA) Grant Program. This plan will result in a five-year guiding document that will outline future revenue streams and build a plan for transit service that responds to current and future needs.

The key study objectives for this effort are:

- Define financial, administrative, and operational changes associated with the pending transition to the §5307 program and develop a plan for the imminent transition.
- Update the Five Year Plan in context of this transition.
- Identify funding strategies or opportunities and regional partnerships to support the growth of transit service.

Figure 1. Study Area Characteristics



3.0 BACKGROUND ON VISTA TRANSIT

Vista Transit has served the City of Sierra Vista and Fort Huachuca since 1994. Originally providing only demand response passenger service requests, the Vista Transit network has grown to operate a fleet of 13 vehicles over six local fixed routes that connect to a centrally located Transit Center, as shown in Figure 1. Fixed route services operate in some capacity from 7:00am to 5:30pm during the week. The lone Saturday route provides service to Fort Huachuca and operates between 10:30am and 5:00pm. In addition to fixed route services, Vista Transit also provides curbside pick-up for riders over the age of 65 and for those with special needs.

In fiscal year 2011/2012 Vista Transit ridership totaled in excess of 158,000 riders, an increase of more than 7 percent from the previous year. According to the 2008 Vista Transit Five Year Master Plan, work commute trips typically represent about 10 percent of the transit trips throughout the City. The remaining trips provide local circulation between key activity centers within the City, including areas of employment, education, medical facilities, shopping, and recreation such as commercial corridors along Fry Boulevard and SR 92, Cochise College, Sierra Vista Mall, the Regional Health Center, and Fort Huachuca. Nearly half of the passengers on the Vista Transit system of services are disabled and/or over 60 years old.

4.0 WORK PLAN

The following Work Plan has been developed to organize, execute, and deliver the results of this plan to ADOT and the City of Sierra Vista. The following tasks describe the approach to the technical analysis and the stakeholder and public involvement processes that the Project Team will pursue in order to achieve the study objectives.

TASK 1 – OVERVIEW OF CURRENT TRANSIT SYSTEM

Objective:

Document and understand the current conditions of the study area and the current operations of the transit network.

Understanding and Approach:

Task 1 will build upon data collected and recommendations made in previous and relevant studies, including:

- 2013 Sierra Vista Transportation Efficiency Study;
- 2008 Vista Transit Five-Year Master Plan;

- Vista 2030: Sierra Vista General Plan Update; and the
- 2012 Regional Mobility Management for the SEAGO Region.

Data that will be compiled and reviewed is expected to include:

- Service area description and operational constraints
- Fixed route line by line profiles, including
 - Service hours/days
 - Ridership by time, stop, segment, and productivity
 - Ridership trends
 - Load factors
 - Service issues, challenges, and our observations about routes
 - Primary travel patterns and trip generators
- Current year funding levels and sources (federal funding, state funding, fares, etc.)
- Fixed route vehicle fleet (size and composition)
- Description of other transit providers within the Vista Transit service area (such as private shuttle operators or non-profit senior transportation)
- Paratransit profile
- Demographic data including projections
- Existing and planned land use

The study team will seek to identify areas of future growth and potential efficiencies that can help the system attract and maintain increased levels of ridership. The efforts in this task will;

- Build a foundation for the analysis and recommendations in subsequent tasks;
- Ensure consideration of all available and pertinent information; and
- Develop an understanding of community objectives, opportunities, and constraints.

Task 1 Deliverables:

- Working Paper #1 – Overview of the Existing Transit System

Throughout the project, it is assumed that deliverables will be submitted in electronic format for review.

TASK 2 – TRANSITION FROM §5311 TO §5307

Objectives:

Provide a summary of procedures and strategies to transition from a §5311 to a §5307 participant.

Understanding and Approach:

The impact of the transition from §5311 to §5307 will be significant. It is expected that the federal funding will be reduced at least for 1-2 years, the list of eligible expenses will change, and matching requirements may change. The FTA offers some guidance through their Triennial Workbook which identifies precedence of temporary grandfathering for systems to ease through transitional problems. However, it is understood that FTA has been firm in their position that October 1, 2014 will mark beginning of §5307 funding only for Sierra Vista.

Key topics for investigation in Task 2 include:

- ***Gain a full understanding of FTA funding process in Arizona*** – As a §5307 grantee in a small UZA, Sierra Vista will need to collaborate with the State of Arizona and a newly designated MPO for the small UZA to conduct planning activities and allocate funds to projects. As part of this process, interviews may be conducted with cities that have gone through similar transitions to assess the effectiveness of those organizations in this type of collaboration and discuss changes experienced under *Moving Ahead for Progress in the 21st Century* (MAP-21). The study team will work through ADOT transit program managers to understand the distribution of §5307 funding in Arizona.
- ***Estimate new funding allocations for Sierra Vista under the §5307 program based on a formula using population and population densities*** – This task will include the development of a framework for funding under the program to help Sierra Vista understand the changes from the §5311 program and to assess the nature of funds available and any constraints or requirements associated with the transition.
- ***Review the current budget, expenditures, and administrative procedures for Vista Transit*** – This task will include review of local transit expenditures for operations, administration, and staffing. As part of this task, the study team will examine potential opportunities to better leverage local and federal dollars. In addition, the team will evaluate changes in processes and procedures under the 5307 program and identify administrative, procedural, and staffing changes that will be required or recommended for Vista Transit due to the transition to 5307. A timeline or schedule for making these changes will be developed to meet federal requirements.

Task 2 Deliverables:

- Working Paper #2 – Transition in Federal Funding Eligibility (§5311 to §5307)

TASK 3 – SYSTEM AND SERVICE EVALUATION**Objectives:**

- Develop initial goals and objectives for the Sierra Vista SRTP.
- Evaluate existing Vista Transit performance and standards.

Understanding and Approach:

Task 3 will focus on an assessment of the existing transit system and will measure relative performance against acceptable standards. This task will identify existing/future transit service needs and issues throughout the City of Sierra Vista and Fort Huachuca as well as develop an initial set of goals, objectives and performance standards for the SRTP. These goals and objectives will be developed with Vista Transit staff and presented to ADOT and TAC members.

This task includes conducting a comprehensive assessment of existing transit operations through in-person observations plus input from Vista Transit staff, stakeholders, and drivers. Understanding the characteristics of the existing service in terms of the metrics identified will provide insight into where improvements in the existing operation can be made. Task 3 will provide a summary of Vista Transit's services and provide a service evaluation of all fixed routes and demand-response services.

In an effort to understand the capabilities, constraints, and opportunities of a rural transit system, Work Task 3 will include the review and analysis of up to three peer cities that have comparable transit systems to Sierra Vista. Those systems will be identified in collaboration with ADOT and members of the TAC in an effort to determine lessons learned and how Sierra Vista can benefit from the experiences in cities.

Task 3 will also include a feasibility evaluation of the recommendations made as part of the *2013 Sierra Vista Transportation Efficiency Study* to help identify potential funding opportunities for these services based on the system and service evaluation.

Task 3 Deliverables:

- Technical Memorandum #1 – Preliminary Goals and Objectives of the SRTP
- Working Paper #3 – System and Service Evaluation

TASK 4 – OPERATIONS, FINANCIAL, CAPITAL, AND MARKETING PLAN

Objectives:

Collaboratively develop an approach to the operations, financing, and marketing of transit services over the next five years.

Understanding and Approach:

Critical to a workable SRTP is a feasible and affordable transit operations and financial plan. SRTPs guide transit service design, operations, and investment, as well as the establishment of service priorities and implementation phasing. The plan must reflect the community's vision for transit and ability to fund and sustain the delivery of cost/effective transit services. The recommendations must be politically acceptable and feasible within local operating environments.

Operations Plan

Using the outcomes reached through the previous tasks, including the existing service analysis and the outreach process, Task 4 will develop an Operations Plan that can guide the short-term operations of the transit systems. The plan will include a menu of service improvements that can be implemented immediately and over the next five years—this will not be a one size fits all approach. The system plan may include the introduction of fixed route or flex route services or it may focus on improving the productivity through a higher frequency premium service. The plan will be developed in collaboration with Vista Transit staff and will be prioritized based on ridership potential and mobility needs.

The Operations Plan will be designed to be cost-neutral, outlining strategies to re-allocate resources that will improve ridership that may include optimization and reallocation of services or possible expansion of services. It will include service improvements that may be implemented quickly as well as those that can be implemented incrementally over a five-year period, or if additional resources become available.

In developing the service priorities plan the effort in Task 4 will consider options such as types of service delivery (dial-a-ride, flex routes, shuttles, fixed-route, high frequency), service strategies (coverage vs. productivity), extended service (longer hours), and linking major transit generators.

The Operations Plan will include a matrix of recommended service improvements to help prioritize the items based on various metrics, including but not limited to the following criteria:

- What is the critical path for all elements?
- What is the timeframe for implementation?

- Does it improve the efficiency of the service?
- Does it address unmet needs?
- How will it impact the reallocation of current resources to support reasonable unmet needs for fixed-route and paratransit services?

All recommendations will be in compliance with the Americans with Disabilities Act (ADA) concerning paratransit and accessibility requirements and assess impacts on Title VI.

Maps of service options will be developed. The service plan will be presented to Vista Transit staff for feedback and to help guide the approach for the financial and implementation plans.

Financial Plan

Task 4 will also include the preparation of a Financial Plan to support the service (operations) and capital recommendations developed. This task will provide information on funding projections and operating expenses related to proposed service changes and implementation timelines. The goal is to ensure that Vista Transit's long-term resources and funding opportunities can sustain any service and capital changes anticipated or recommended. Funding realities could result in a further prioritization of service strategies and the timing of implementation.

The Financial Plan will provide detailed expense and revenue forecasts for the implementation plans for each of the five years of the 2014 to 2019 SRTP, and will be linked to service plan recommendations in the Operations Plan. It will address any fare policy changes that would include the following:

- Change in fare revenue due to fare increase or decrease
- Change in fare revenue due to service changes
- Change in fare expenses due to a change in level of service
- Change in fare expenses due to a labor or service contract change

As part of the development of the Financial Plan, assumptions made in calculating budgets will be documented and a comparative assessment of potential alternative funding options for Vista Transit based on the opportunities for regional partnerships will also be conducted.

Capital Plan

It is important for the Capital Plan and Operations Plan to be coordinated. Too often a Service Plan calls for changes or expansion that is not realistic within the capital procurement environment. The Capital Plan will focus on bus specifications including capacity and size, life cycle, alternative fuel strategies, and fuel capacity. Other elements of the Capital Plan will

include passenger amenity improvements, scheduling and technology enhancements, and any base facility (bus stops, bicycle, P&R lots) or maintenance requirements. The Capital Plan will also identify land use strategies that could provide benefits to the transit operations as well as ridership. It will include specific fleet retirement/replacement and life cycle recommendations vehicles and other equipment.

Capital acquisition needs will be prioritized on an annual basis and compared to projected capital fund. The Capital Plan in Task 5 will identify potential funding sources to balance gaps between existing and required capital funds.

Marketing Plan

The marketing aspect of this SRTP will identify recommendations and strategies for expanding both existing services and programs and future planned service enhancements operated by Vista Transit. The first step in this process is to identify barriers to reach the local market. Following the review and assessment of earlier tasks in this SRTP including a review of recently completed studies, this task will identify current and potential future barriers for reaching the unrealized local and regional transit market.

Upon identifying barriers to the growth of the transit market, the next step will be to develop a program growth strategy that will help guide Vista Transit to maximize its opportunities while overcoming barriers to program growth. The growth strategy will identify opportunities for expanding Vista Transit services and will explore expansions to the existing network.

Task 4 Deliverables:

- Working Paper #4: Operations Plan, Financial Plan, Capital Plan, and Marketing Plan (Note: Consider combining with WP 5.)

TASK 5 – EVALUATE REGIONAL PARTNERSHIPS AND FUNDING STRATEGIES

Objectives:

Evaluate regional partnerships and funding alternatives.

Understanding and Approach:

Critical to the success of regional transit systems is the identification of sustainable funding sources to support system development and operating and maintenance costs. Task 5 will include a comprehensive screening of the spectrum of potential federal, state, local funding sources and alternative funding strategies that could be used to support the proposed service plan. Defining the universe of funding mechanisms will be the first step in the process. As part of this task, a fairly comprehensive list will be developed of independent revenue sources, many of which have been used for transit elsewhere. These sources range from the standard federal

programs, to robust regional funding like sales or property tax, to tax increment financing and public/private partnerships.

An initial screen will eliminate funding mechanisms from consideration because they are not enabled, require too much effort, or have a poor nexus with transit. As a part of the screening, Task 5 will:

- Determine whether each funding source is enabled under Arizona law
- Applicability of use for transit capital expense or operating costs or both
- Provide implementation strategies

The study team will also investigate the benefits and challenges of creating a Regional Transit Authority (RTA) or an IPTA in the Sierra Vista –Douglas Area or establishing service agreements with SEAGO. The study team will collaborate with the TAC to assess whether potentially viable services may be implemented cooperatively or regionally, and identify opportunities for funding and implementation strategies or partnerships to meet needs. These services may include intercity transit services or cooperative efforts with Fort Huachuca or other stakeholders.

Task 5 Deliverables:

- Working Paper #5 – Regional Partnerships and Funding Strategies (Note: Consider combining with WP 4.)

TASK 6 – PREPARE SHORT RANGE TRANSIT PLAN

Objectives:

Develop a Draft and Final Five-Year SRTP.

Understanding and Approach:

Task 6 will result in the preparation of a Draft SRTP and provide a succinct compilation of the working papers with refinements as identified through the public involvement process or via stakeholder or TAC input. The Draft SRTP will be circulated to ADOT and the TAC for review. The Final SRTP will reflect refinements based on the reviews of the Draft SRTP and public input. After completion of the Final SRTP, an executive summary will be prepared to summarize the results and recommendations from this study.

Task 6 Deliverables:

- Draft and Final Short Range Transit Plan
- Draft and Final Executive Summary

5.0 STUDY TEAM/ROLES AND RESPONSIBILITIES

Figure 2 identifies the key project team that will perform the work on this study.

Figure 2. Sierra Vista Project Team



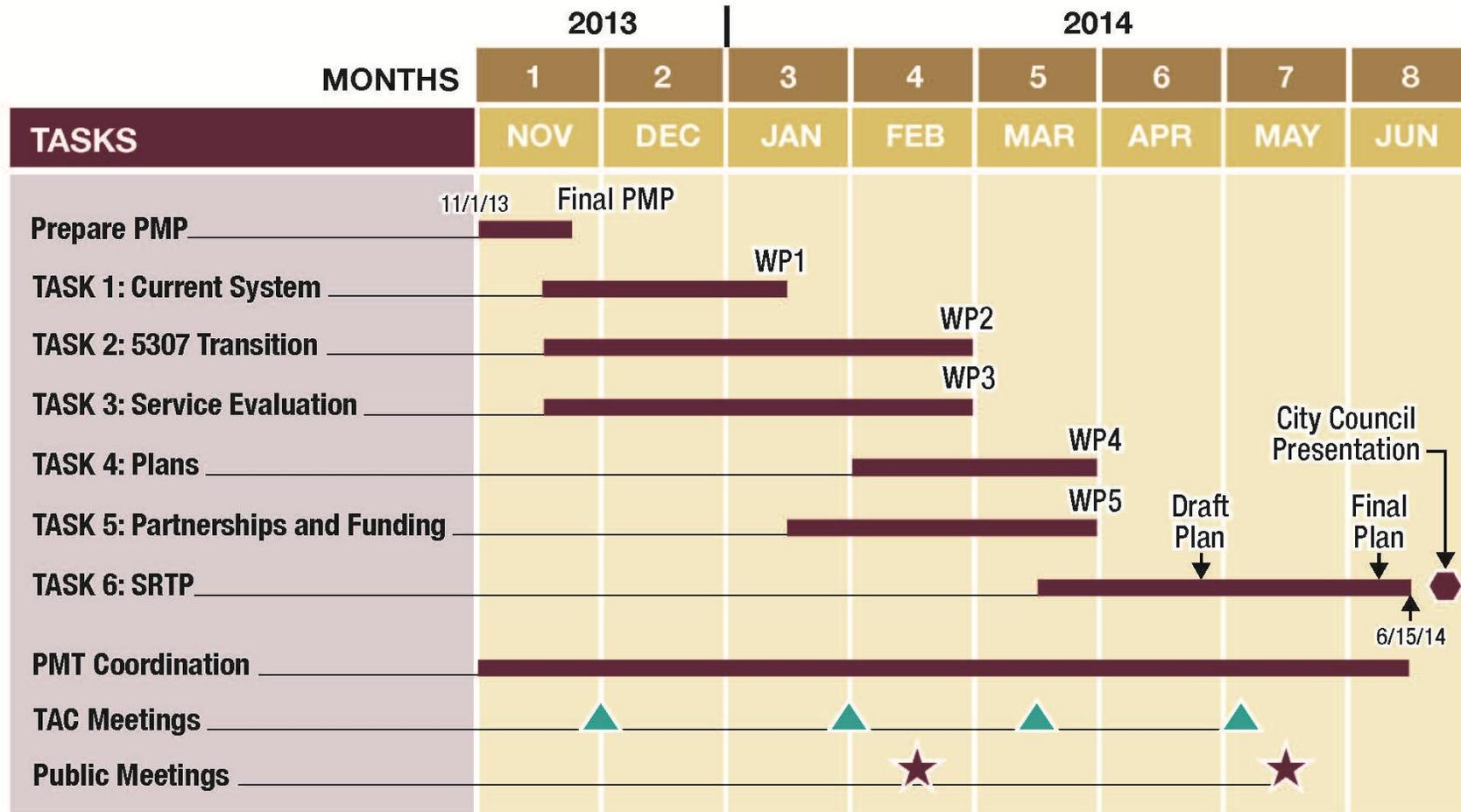
Table 1 identifies contact information for the project team.

Table 1. Project Team Contact Information

Name	Role	Phone	Email
Shilpa Panicker	ADOT Project Manager	602.712.7465	spanicker@azdot.gov
Richard Cayer	Lead Contact for the City of Sierra Vista	520.458.5775	Richard.Cayer@SierraVistaAZ.gov
Tony Staffaroni	Public Involvement Lead	602.712.7685	AStaffaroni@azdot.gov
Kammy Horne	URS Principal-in-Charge	602.648.2389	kammy.horne@urs.com
Jennifer Pyne	URS Project Manager	602.648.2335 480.266.0645 (cell)	jennifer.pyne@urs.com
Brian Piascik	Lead, Financial Strategies & Regional Partnerships	972.764.7614	brian.piascik@urs.com
Andrew Ittigson	Lead, Transit Service Planning & Operations	214.741.7777	andrew.ittigson@urs.com
Kristen Leuken	Transit Planner		kristen.leuken@urs.com
Tyler Besch	Transit Planner	602.648.2331	tyler.besch@urs.com
Brandy Sweitzer	Transit Marketing	717.718.0015	brandy.sweitzer@urs.com

6.0 SCHEDULE

Figure 3. Sierra Vista Short Range Transit Plan Schedule



7.0 COORDINATION

Project coordination will occur between members of a Project Management Team (PMT), members of a Technical Advisory Committee (TAC), and engaged stakeholders throughout the duration of the project.

Project Management Team

The PMT will establish regular coordination between representatives which include members of:

- URS Project Team
- ADOT
- City of Sierra Vista and Vista Transit

The PMT will guide the overall direction of the SRTP and oversee the schedule, budget, and planning approach. These representatives will communicate via bi-weekly conference calls throughout the course of the project to touch base on TAC participation, overall roles and responsibilities, schedule, and progress.

Technical Advisory Committee

The TAC will be established to serve as the sounding board for the project team and provide guidance on local data sources, issues, and challenges. The TAC will meet four times throughout the course of the project, with at least two meetings occurring in person and the others via webinar or teleconference. The proposed topics for the four TAC meetings are identified in Table 2.

Table 2. Technical Advisory Committee Meetings

Meeting Number	Purpose
TAC #1 – Date December 2013	Hold project kick-off meeting, review PMP, discuss existing conditions and data sources, and provide input on the effectiveness of the last five-year plan and lessons learned.
TAC#2 – January/February 2014	Review considerations, opportunities, and challenges related to the transition to §5307; provide an update on the system and service evaluation (Task 3).
TAC #3 – March 2014	Discuss components of operations, financial, and marketing plans and solicit input prior to completion of working papers; discuss pros and cons for regional partnership organizations. (Task 4 and Task 5)
TAC #4 – May 2014	Review draft SRTP and discuss resolution of continuing issues from prior meetings.

Members of the TAC are identified in Table 3.

Table 3. Technical Advisory Committee

Name	City/Agency	Title	Phone	Email
Thomas Reardon	City of Sierra Vista	Council Member		reardont35@aol.com
Corinna Carbajal	City of Bisbee	Program/Grants Administrator	520.432.6016	ccarbajal@cityofbisbee.com
Richard Cayer	City of Sierra Vista	Operations Manager	520.458.5775	richard.cayer@sierravistaaz.gov
Nicole Patrick	ADOT	Program Manager – Rural Transit Programs	602.712.8947	npatrick@azdot.gov
Shilpa Panicker	ADOT	Project Manager	602.712.7465	spanicker@azdot.gov
Tony Staffaroni	ADOT	Community Relations	602.712.7685	astaffaroni@azdot.gov
Connie Gastelum	SEAGO			cgastelum@seago.org
Karen Lambertson	Cochise County			klamberton@cochise.az.gov
Humberto Rivera	City of Douglas	Transit Manager		Humberto.rivera@douglasaz.gov
Kacey Carter	Fort Huachuca	Master Planner	520.533.5125	Bonnie.k.carter@mail.mil

Public/Stakeholder Groups

The project team will coordinate with the ADOT Communications Division on the Public Involvement Plan (a preliminary Plan is provided as Appendix A). It is anticipated that two public meetings will be conducted throughout the planning process, as well as individual stakeholder meetings and interviews.

8.0 PROGRESS REPORTING AND INVOICING

URS will submit a monthly progress report and invoice to ADOT that details work completed and ongoing during each monthly reporting period. Invoices and progress reports will be submitted to ADOT on a monthly basis.

9.0 QUALITY ASSURANCE AND DOCUMENT APPROVAL PROCESS

Every deliverable submitted as part of this effort will undergo the internal URS Corporation Quality Assurance/Quality Check (QA/QC) process which documents the review cycles of work products prior to submittal to ADOT. Every deliverable submitted be first be reviewed by the PMT. Upon PMT acceptance, they will be circulated to members of the TAC for review and comment. Once a deliverable has been reviewed and approved by both members of the PMT and members of the TAC it will be posted on ADOT's project website.

Appendix A

Draft Public Involvement Plan

VISTA TRANSIT SHORT RANGE TRANSIT PLAN STUDY
PUBLIC OUTREACH AND INVOLVEMENT PLAN

November 2013

1 INTRODUCTION

This Public Outreach and Involvement Plan has been developed to describe in detail how the Arizona Department of Transportation (ADOT), City of Sierra Vista, Vista Transit, and the project team will solicit public input; inform and involve the public, elected officials, agencies and stakeholders regarding the City of Sierra Vista, Vista Transit Short Range Transit Plan.

This plan is subject to change and may be revised as required. Updates to this plan will be provided as dictated by the study and public involvement process.

STUDY DESCRIPTION

The purpose of this project is to provide a plan for Vista Transit to deal with the transition from a 5311 Transit System to a Section 5307 program and to update the Five Year Plan (Short Range Transit Plan) in the context of this transition. In addition, this study will also research and identify funding sources and regional partnerships that can assist with the growth of the system outside of its current boundaries.

PURPOSE AND GOALS OF THE PUBLIC OUTREACH AND INVOLVEMENT PLAN

This plan will help guide ADOT Communications and the project team to obtain meaningful input from the community (elected officials, agencies, public, businesses, and stakeholders). The public involvement process embraces innovation, commitment, transparency and trustworthiness in working with all project stakeholders and strives to create an environment that provides and promotes meaningful dialogue and opportunities for individuals with disabilities or language challenges to participate. The goals of this plan are to outline the process objectives and describe the techniques to be used. Goals of the public outreach program include:

- Engaging stakeholders to help ensure the final report incorporates agency and public input
- Providing clear and accurate information that encourages informed public participation and input
- Providing multiple, convenient ways for interested parties to provide comment
- Providing multiple means through which the public can learn about the project

2 PUBLIC INVOLVEMENT OUTREACH ACTIVITIES

The following listing shows the outreach and input tools that will be used throughout the course of the study. The following listing is in no particular order.

STAKEHOLDER ANALYSIS

Prior to the public meetings, the technical consultant team will meet with, survey and interview the stakeholders to obtain their input and feedback on current issues and deficiencies, as well as

perspective on investment into regional transportation facilities. The interviews will also be used to evaluate the data collected by the technical consultant.

TECHNICAL ADVISORY COMMITTEE (TAC)

A Technical Advisory Committee (TAC) will be established to oversee and guide the Technical Consultant's work efforts. The TAC includes representation from the appropriate agencies defined by the project team and the City of Sierra Vista.

A Communications representative will attend TAC meetings in person or by phone to provide updates on the public involvement process.

DEVELOP COLLATERAL AND PRINTED MATERIALS

A number of different types of print materials (e.g., fact sheets, frequently asked questions, e-newsletters, online survey) may be prepared to explain the project and provide information on how to participate and comment.

STUDY WEBSITE

A project website will be created and will be maintained by ADOT Communications and/or ADOT MPD to provide information to those with Internet access. The website is hosted by ADOT and will include all study materials, meeting summaries, a link to the online survey (if created) and the ability to email the project team comments and questions.

OPEN HOUSE/PUBLIC MEETINGS

Two open houses/public meetings will be planned as part of the study. The first open house will focus on the existing conditions and obtain input on future transportation needs and how best to address those needs. The target meeting date will be early to mid-February.

The second open house will occur once the plan has been created and will be used to roll-out the recommendations to the community and is tentatively scheduled for early to mid-May.

TELEPHONE COMMENT LINE

A telephone comment line is available, enabling callers to make comments or ask questions about the project. When necessary, a study team member will contact each caller no later than 24 hours on the next business day after the message is received. The telephone comment line number will be published in all public involvement materials. The telephone comment line number is 855.712.8530.

NEWSPAPER ADVERTISING

Newspaper advertisements will be developed to publicize the outreach effort. Newspaper notices could be designed in both black-and-white and color at a size specific to each

publication. Newspaper notices will be placed in the newspapers listed below and will be published two weeks and one week prior to the public meetings.

CONTACT/COMMENT DATABASE

All comments received will be documented, and a response will be provided. The following methods will be utilized to solicit and/or acquire comments:

- Comment form at the public meetings
- Project website/online comment form
- Telephone information hotline
- E-mail account
- Written letters

A database combining contact information and comments received from the public will be developed. The contact list contains names, addresses, phone numbers, and e-mail addresses of any members of the public who have expressed an interest in the study or have submitted comments. The comment database will maintain all comments received via letter, e-mail, comment form, and/or phone call. All comments will be entered into the database and categorized. The database is updated on a regular basis, as needed.

3 TITLE VI/ENVIRONMENTAL JUSTICE

Title VI of the Civil Rights Act of 1964 and related statutes assure that all individuals are not excluded from participation in, denied the benefit of, or subjected to discrimination on the basis of race, color, national origin, sex, and disability. Executive Order 12898 on Environmental Justice directs that programs, policies, and activities not have a disproportionately high and adverse human health and environmental effect on minority and low-income populations. The implementation of the PIP should ensure that these protected populations are given the opportunity to participate in this study.