

# Arizona Department of Transportation Public Involvement Annex to comply with Federal Motor Carrier Safety Administration requirements

## **ADOT Public Involvement Philosophy**

As ADOT strives to create and maintain a transportation system for Arizona that improves the quality of life and bolsters the state's economy, we will include a diversity of voices and viewpoints from across the state that provide valuable insight to help inform the decision-making process. This extends to highway construction and operations, long-range planning, Motor Vehicle Division services and commercial vehicle enforcement duties.

## **Public Involvement Requirements**

Federal regulations do not specifically define how to perform public involvement. Project teams develop and implement public involvement plans that are relative to the needs of the specific project and public. This flexibility allows adoption of the following guidance, which seeks to ensure public participation by a comprehensive range of stakeholders. As an agency, project team members will be familiar with the guidance, practices and documentation required as stated in this document and especially with the federal requirements for Title VI, Environmental Justice, Americans with Disabilities Act and Limited English Proficiency outreach and for National Environmental Policy Act (NEPA), if applicable. All project team members will be familiar with ADOT's Public Involvement Plan and use the tactics required for federal compliance for public participation. The designated ADOT Communications and Public Involvement liaison to the ADOT Civil Rights Office will provide training for any or all team members when public involvement is required. Whether for a new highway or the scheduled closure of a Motor Vehicle Division Office, ADOT's public involvement philosophy and processes remain equitable.

## **Linkage to ADOT PIP**

As stipulated by FMCSA in their guidance documents, ADOT's <u>Public Involvement Plan</u>, as approved by the Federal Highway Administration, will remain the standard for how ADOT and MVD conduct outreach and gather public perspective on planned service modifications. The more stringent guidelines for NEPA project outreach will support the decision process for MVD with outreach to communities and key stakeholders.

Additionally, MVD commits to documenting all community input and completing an analysis to identify primary concerns, and providing that input to decision makers. Following implementation of the change, public sentiment/comment will be tracked for no less than six months for reaction or unforeseen consequences. If necessary, adjustments may be considered following the track-and-assess process.

# **Motor Vehicle Division-Specific Overview**

As a dynamic customer service-oriented operation, the Arizona Department of Transportation Motor Vehicle Division is consistently monitoring and reviewing its performance, and operational needs and capacity in future years. Part of this process will occasionally require a review of the effectiveness and need for physical MVD offices in various localities. Population shifts, technological advances and the age of office infrastructure are some of the factors considered when office locations are modified, including full closure.

When the decision has been made to make major service reductions or to eliminate service at a particular MVD office, MVD – in consultation with ADOT Communications and Public Involvement – prepares a comprehensive plan of public outreach aligned with the agency <u>Public Involvement Plan</u>, approved in 2017 by the Federal Highway Administration.

# **Stakeholder Assessments**

Public involvement activities must be accessible to anyone who has an interest in the initiative, regardless of race, color, national origin, age, sex, disability, limited English proficiency (LEP) and low-income status. Making sure that all interested members of the public are provided the opportunity to have input helps ADOT and MVD comply with federal nondiscrimination regulations, including Title VI, Americans with Disabilities Act, Environmental Justice and Limited English Proficiency. In addition to legal requirements for public involvement, the more that is known about the area population, the more effective the outreach will be.

The following factors/demographics should be documented and addressed in any MVD outreach plan supporting a service-level change:

- Race
- Age
- Sex
- Income levels
- Home occupancy

- Disability
- Language spoken at home
- Vehicles available/use of transit
- Employment
- Number of licensed drivers at home

In preparing a stakeholders list, ADOT will identify affected customers (those who benefit and those burdened by the proposed action), and any advocacy groups, churches, community-based organizations/nonprofits, other advisory bodies, etc. Stakeholder lists will include demographic information for affected customers regarding race, color, national origin (including Limited English Proficient individuals), sex, age, disability, and income-level. Thus, stakeholder lists will be inclusive, ensuring that news of the proposed action is communicated to the greatest number of customers and done so in a way that provides accessibility for the unique makeup of the customer base. Because ADOT staff and consultants, when used for outreach, may not be experts in the expectations, sensitivities or interests of a particular community, the Department will always begin compiling an outreach plan and stakeholder assessment based on input from local, regional and others in formal or informal leadership positions in the community. As a large and diverse state, this is a critical process step and respects the norm established by the Department, and the expectation of local, regional and statewide leaders.

#### **Process for Outreach**

Typically, the initial and earliest effort will be to contact government representatives in the potentially affected area. This includes – but is not limited to – state legislators, county supervisors, mayors and city council members and local tribal community leaders, as well as professionals such as city/town managers, legislative staff, etc. This is intended to outline the reasons for the upcoming change and to obtain feedback from these stakeholders. ADOT Communications and Public Involvement will assess, using tools outlined in the agency's Public Involvement Plan, which community groups may have an interest in upcoming MVD action; efforts will be made to communicate with those groups in writing and, if necessary, in person. Following completion of the Four-Factor Analysis and review of U.S. Census records, accommodations will be made for those members of the community who do not speak English by printing materials in the appropriate languages and having translators available at any public meetings.

Notification to the general public is made using various mass media available. This may include newspapers and local media websites, social media and notices posted at the office location, community centers, religious organizations and other locations where community members frequent. Accommodation languages, as required by Title VI of the Civil Rights Act, are included. Additional notification can be made through the use of mass emails from ADOT Communications and Public Involvement to interested members of the public. ADOT Communications and Public Involvement has the capability to deliver such emails on a broad geographic basis as well as to news media and MVD customers. Distribution of information will vary based on community expectations and the tools available in each community.

For proposed closures that may have a statewide, as opposed to limited local or regional implications, MVD would initiate public meetings to explain the upcoming change and to obtain customer feedback. When appropriate based on community sensitivities or communication preferences, MVD has, on occasion, held meetings to discuss planned service changes for local and regional operations that did not have statewide impact. Consideration is given to ensuring the meeting location is accessible to all stakeholders (close to transit if possible, Americans with Disability Act compliance, etc.) and at an appropriate time of day based on community assessments. Public meetings are planned and implemented in compliance with the ADOT Public Involvement Plan.

# **Outreach Options**

Scope and significance will be critical in determining the scale of required outreach for service alterations or facility closures. In accordance with provisions outlined through Federal Highway Administration guidelines for the implementation of the National Environmental Policy Act and from guidance from the Federal Motor Carrier Safety Administration, MVD will assess the service radius for each impacted facility to aid in identification of the

target population. That data, connected to the severity of the service impact, will guide decisions on the need for formal public meetings, written/published advisories, less formal public notification, or no advance notice at all. As part of the service-area assessment and possible community impact, MVD will evaluate the role of Authorized Third Party offices to provide services as needed to the public or if other technological-based options (such as kiosks in public facilities) will meet the identified community needs. Whether the change has local, regional or statewide impact will further inform decisions on how to engage customers to assess the full scale of impacts and provide data to decision makers. While more than 30 services currently can be completed online, and with a combination of ADOT- and privately operated motor vehicle services offices throughout the state, a range of service delivery options are available; yet, ADOT realizes that each population is unique in their needs, expectations, access to technology, and need for specific support to fully participate as an ADOT customer.

Public involvement for any proposed action under ADOT purview aims to involve the largest possible segment of the population. Yet traditional methods such as meetings and hearings might be attended by only a small group of people compared to the number who are interested or affected. To maximize public engagement, ADOT attends public events or identifies public places to disseminate information pertinent to the proposed MVD action, either by distributing fliers or by setting up kiosks/booths to discuss details. Following are examples of nontraditional places where grassroots outreach can be used:

- Distributing information about a proposed action or upcoming opportunities for public involvement at transportation hubs, transfer stations or heavily used transit stops.
- Setting up a booth at community fairs or events to increase exposure for a proposed action and distribute fliers or other information, in appropriate languages.
- Sharing posters or information at shopping centers, where the outreach team can reach a large number
  of people from diverse backgrounds, and at community centers or other common community gathering
  places (the latter can be highly effective when reaching Native American communities, e.g., coordinating
  with chapter houses and other locations where other community information is regularly shared).
- Hosting community meetings.
- Meeting with trusted members of a community to seek their assistance with distributing information and/or collecting feedback

#### **Assessment of Input**

While there is not a public vote on implementing or rejecting a proposed change to MVD services, input from members of the community – respecting the diversity of the community – shall inform the decision of Department or Division leaders. In accordance with the ADOT Public Involvement Plan, all comments shall be documented either individually or thematically and analyzed into an executive summary to aid decision makers. The summary and underlying analysis shall be sufficient to represent the input of the community and review any changes to the proposed action that are made based on this input. This critical step – documenting how the decision was influenced, if at all – is key in building and maintaining community support for the proposed change and for ADOT and MVD. Once a proposed action is implemented, efforts to gather public opinion will continue to assess any needed mitigation or countermeasures to smooth the transition; adjustments can be made following the Arizona Management System processes.

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