



# Public Participation Plan (PPP)

## for the Tulsa Transportation Management Area

September 2023



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## **Mission Statement**

The mission of the Public Participation Plan is to encourage and promote active public participation throughout the planning and decision-making process related to the development of proposed transportation plans, programs, and projects so that a safe, balanced, and efficient regional transportation system, reflecting the needs and interests of all stakeholders, can be provided.

## **Purpose of this Document**

This document serves as a guide for citizens, elected officials, decision-makers, and INCOG staff to gain a better understanding of the Public Participation Plan, and as a tool for planners and decision-makers to better engage citizens, community groups, organizations, schools, and businesses in the process of planning the transportation system for the Tulsa Transportation Management Area.

The Public Participation Plan describes the strategies and techniques that the INCOG uses to inform and engage the public in transportation planning issues with the purpose of maximizing participation and effectiveness.



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## Abbreviations

Fixing America's Surface Transportation Act (FAST ACT)

Indian Nations Council of Governments (INCOG)

Infrastructure Investment and Jobs Act/Bipartisan Infrastructure Law (IIJA/BIL)

Limited English Proficiency (LEP)

Metropolitan Planning Organization (MPO)

Metropolitan Tulsa Transit Authority (MTTA)

Moving Ahead for Progress in the 21st Century (MAP-21)

Oklahoma Department of Transportation (ODOT)

Public Participation Plan (PPP)

Metropolitan Transportation Plan (MTP)

Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users (SAFETEA-LU)

Transportation Improvement Program (TIP)

Tulsa Transportation Management Area (TMA)

Transportation Policy Committee (TPC)

Transportation Technical Committee (TTC)

Unified Planning Work Program (UPWP)

U.S. Department of Transportation (DOT)



# Introduction

Transportation affects almost every aspect of a person's life; consequently, it is important that the transportation system be efficient and safe for all users.

"Transportation planners try to figure out how to get you to and from your destinations safely and on time not only today but also 5, 10, and even 20 years from now."<sup>1</sup>

Transportation decision-making is carried out at several levels of government. As the Metropolitan Planning Organization (MPO), the transportation planning and programming agency for the Tulsa region, INCOG's mission is to plan short and long-term solutions to transportation concerns. The Federal Government (U.S. Department of Transportation [DOT]) reviews the transportation planning and project activities of the MPO and Oklahoma Department of Transportation (ODOT) and supplies critical funding needed for transportation planning and projects. The federal government recognized that the metropolitan regions should be responsible for evaluating the changing development patterns and the economic and cultural diversity of the metropolitan areas, through strengthened planning practices and coordination between states and metropolitan areas.

The MPO planning process begins with a visioning exercise from which the Metropolitan Transportation Plan (MTP) is developed and then the Transportation Improvement Program (TIP) is produced. The MTP has, at a minimum, a 20-year horizon and covers all modes of the surface transportation system (i.e., walking, bicycling, riding transportation and driving). The TIP is developed every 2 years and contains the individual transportation improvements and projects scheduled for the next 4 years. All projects using federal funds must be included in the TIP. Also, all regionally significant projects must be included in the TIP. As part of the development of both documents, public participation is essential and is the key element in producing plans that fit the needs of the region.

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<sup>1</sup> U.S. Department of Transportation Federal Highway Administration, 2001, "A Citizen's Guide to Transportation Decision-making," Washington, DC.



INCOG is a voluntary organization of local governments that serves as the MPO for the Tulsa Transportation Management Area (TMA). As of 2023, the Tulsa TMA includes: Tulsa County and portions of the surrounding counties, namely Creek, Osage, Rogers, and Wagoner Counties (see map on page 8). It is the goal of INCOG to provide a cooperative transportation planning process that encourages citizens to voice their ideas and opinions to help guide decision-makers in shaping the transportation system for the future. The Public Participation Plan (PPP) is a framework for accomplishing the cooperative process goals among the MPO members, technical and policy committees, public agencies (including emergency response agencies), elected officials, and citizens.

IIJA/BIL continues to encourage a more proactive citizen participation process throughout the transportation planning process mandating public access to complete information, timely public notice, and early and continuing public participation opportunities in developing plans. INCOG proposes to implement approaches and elements to encourage participation by stakeholders in the regional transportation planning process.

The public participation elements within this document will be used as guidance in developing the Metropolitan Transportation Plan (MTP), Transportation Improvement Plan (TIP), and other appropriate transportation policies, plans, programs, and projects. These guidelines may be applied to other planning functions carried out by INCOG, taking into consideration other program requirements and needs as appropriate. The purpose of the Public Participation Plan (PPP) update is to not only continue to serve as a guide for INCOG staff in the development of public outreach strategies used in the transportation improvement process, but to also place a stronger emphasis in reaching our region's Title VI community which includes older adults, persons with limited English proficiency, persons with disabilities, ethnic groups, and low-income households. The process will seek to provide the greatest level of education on transportation issues as well as opportunities for citizens to contribute their ideas and voice their opinions early and often. The process will further seek to establish trust and credibility for the transportation planning process and the MPO by resolving



conflicts and seeking consensus between citizens and professionals for policies and projects.



**Figure 1** *Public Participation Stakeholders*



INCOG actively seeks the views of historically disadvantaged people including racial & ethnic minorities, people with disabilities, seniors, and people with low and moderate incomes.

### **Goal 1 – Inform, Reach Out, and Educate the Public**

Inform and educate stakeholders and interested citizens, share information, and increase the overall awareness of regional planning and transportation activities in the Tulsa region.

Involve underserved communities in the MPO transportation planning process.

### **Goal 2 – Engage the Public and Encourage Ongoing Participation**

Ensure the public have been provided with adequate and meaningful opportunities to participate in the decision-making process. Establish a significant and ongoing public participation in transportation planning processes.

### **Goal 3 – Promoting Open and Accessible Involvement**

Document and review all input received from diverse audiences and use the input to shape plans and programs. The process will be transparent and open to the public.

**SEND US AN EMAIL**  
incog@incog.org  
*to ask questions, provide comments, or join our mailing list*

**CALL US**  
918-584-7526  
*to ask questions, provide feedback, or talk about anything regarding transportation*

**VISIT OUR WEBSITE**  
www.incog.org  
*for INCOG latest plans and updates,, meeting calendars, sign-up for Newsletters and mailing list, and more*

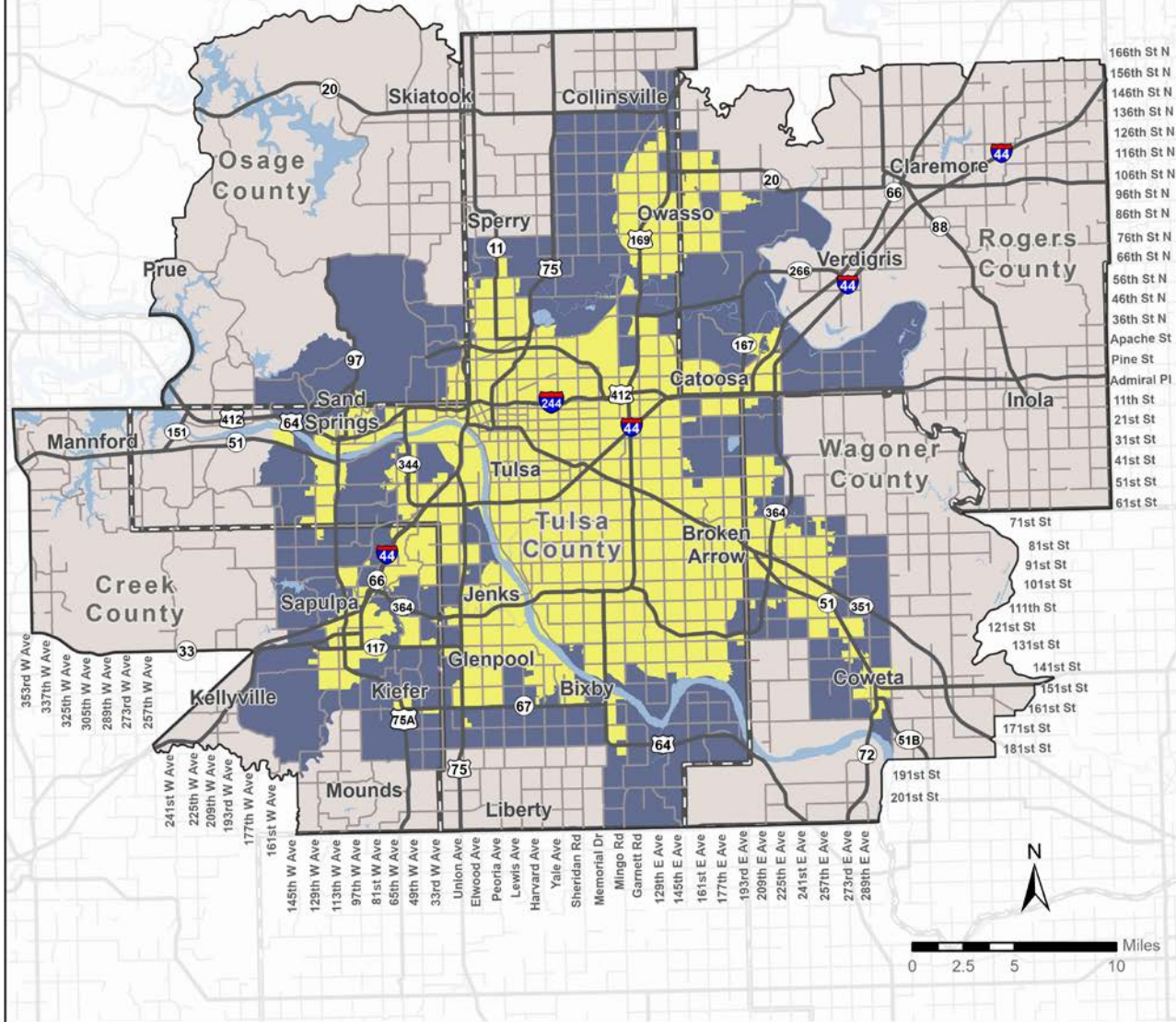
**PARTICIPATE IN PERSON**  
*by attending advisory committee meetings, and public outreach events*

**WRITE TO US**  
2 West Second Street Suite 800,  
Tulsa, OK 74103  
*to provide comments*

**Figure 2** *How to Get Involved in the Transportation Planning Process*



## Tulsa Transportation Management Area (TMA)





## We will convey information

### on a variety of platforms



print



online



display



mailing lists

### to audience of varying



languages

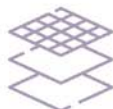


abilities

### in a variety of visualization techniques



texts



maps



charts



PowerPoint  
slides show



videos



images

### through a variety of outreach methods



presentations,  
public meetings  
and workshops



INCOG Newsletter  
& mailing lists



Advisory  
Committees



exhibit at events  
Farmers' markets  
Athletic events  
Tulsa State fair etc.



comment cards  
Make comment cards  
available at every  
public meeting



public opinion  
surveys & polls



INCOG website  
[www.incog.org](http://www.incog.org)



Online and  
Printed Materials  
User-friendly documents,  
including flyers and  
post cards

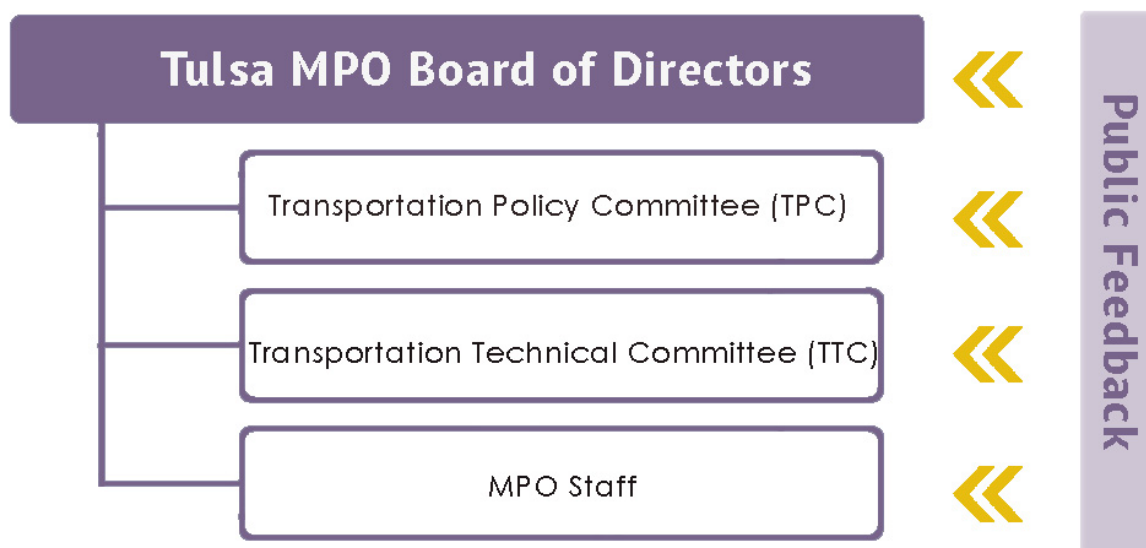
**Welcome. Bienvenido. Willkommen. sự chào đón. 欢迎.**



## INCOG's Structure and Public Committees

The following highlights INCOG's structure and the roles of the various committees engaged in the transportation planning process. All committee meetings are open to the public, and citizens are encouraged to attend and to participate. INCOG's staff provides information and support to the INCOG Committees, prepares the documents and plans produced as part of the transportation planning process, facilitates public outreach activities to gain input and feedback, and manages the planning process.

### INCOG's Structure



**Figure 3** *INCOG's Structure*

Members of **INCOG's Board of Directors** represent the principal elected officials of the local governments in the Tulsa metropolitan area. Thus, the Board serves as a forum for cooperative decision-making on issues of regional significance, including transportation. The **Transportation Policy Committee (TPC)** is the forum in the local decision-making process for policy development and adoption related to transportation planning, its program development, and its operation within the Tulsa TMA. Upon approval by the TPC, transportation policies, plans, and programs are forwarded to the



INCOG Board of Directors for endorsement. The **Transportation Technical Committee (TTC)** serves as an advisory group to the TPC, providing technical expertise in the development of transportation plans and programs for the Tulsa TMA. Representation on both committees includes federal, tribal, state, and local governments as well as other agencies and stakeholders.

INCOG's Board of Directors and advisory committees meet regularly throughout the year. All these committees offer the chance for input to be provided on the MPO's transportation work. Besides, all meetings are open to the public. Taken all together, the committees' meetings cover a range of days and times to provide opportunity to learn about Tulsa MPO planning effort for people with various life and work schedules, including the Title VI and Environmental Justice target populations.

**TABLE 1 – INCOG Public Meeting Schedule and Notification Summary**

	Schedule	Meeting Schedule	Public Meeting Notice	Public Review Period
<b>Meetings</b>				
<b>BoD</b>	2nd Tuesdays at 1:30pm	<a href="https://www.incog.org//AboutUs/board_meetings.html">https://www.incog.org//AboutUs/board_meetings.html</a>	1-5 days	Every Meeting
<b>TPC</b>	Monthly or as needed (last Wednesdays at 10:30am)	<a href="https://www.incog.org//Transportation/transportation_meetings.html">https://www.incog.org//Transportation/transportation_meetings.html</a>	1-5 days	Every Meeting
<b>TCC</b>	Monthly or as needed (third Wednesday at 10:00am)	<a href="https://www.incog.org//Transportation/transportation_meetings.html">https://www.incog.org//Transportation/transportation_meetings.html</a>	1-5 days	Every Meeting
<b>Other meetings or workshop</b>	As needed	N/A	1-5 days	Every Meeting



## Importance of Public Participation

Public participation throughout the planning process will ensure the gathering of meaningful information from the users of the transportation system. Stakeholders can range from elected officials and planning boards to property owners and special interest groups – and each entity has its own expectations and concerns. Engaging the public through public participation will build support for their projects. “By conducting interviews, creating focus groups, distributing surveys, and providing a variety of forums for explanation and feedback, transportation officials are able to define and understand the issues that affect their constituents. As a result, they are able to incorporate public needs and desires into their planning, and complete projects that address transportation needs as well as quality of life.”<sup>2</sup>

Public participation processes inform citizens, groups, and organizations about specific decisions likely to affect their lives, ensure that planning and decision-making consider views and inputs from stakeholders, and resolve issues and problems taking into consideration multiple interests and concerns. Above all, public participation processes encourage citizens and organizations to take an active participation in their community-related transportation issues, building a relationship for better communication and cooperation.

The Tulsa MPO, through guidance from Federal agencies and ODOT, believes that continued interaction with the entire community builds support, and more importantly ensures that the public has an opportunity to help shape the substance of plans and projects. Tulsa MPO staff evaluate existing outreach strategies for effectiveness, and research new potential strategies to maintain and enhance an inclusive and open metropolitan transportation planning process.

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<sup>2</sup> Meyer, Judy, “Public Transportation Power of the People,” *American City & County*, November 20, 2000.



# Public Participation General Guidelines

It has long been a challenge to engage the public in plans and programs, providing the means for people to have a direct and meaningful impact on the decision-making process. The following guidelines were developed with the purpose of facilitating this process and reflecting federal requirements (Federal Regulation Code 450.316 and 450.212 for Metropolitan Planning processes).

- Build awareness, interest, and support in the general public and decision-makers using innovative tools, media campaigns and combinations of different public participation techniques designed to meet the needs of the public.
- Provide and encourage opportunities for direct citizen attendance and participation from the early stages of the planning process.
- Develop methods to collect input from citizens who cannot attend meetings, such as direct mail and web-based input strategies providing “everyone” a reasonable opportunity to comment on the proposed plans or programs.
- Periodically review and revise the Public Participation Plan in terms of effectiveness to assure that the process provides full and open access to all.
- Provide the public with timely notice and reasonable access to technical and policy information used in the development of plans or programs.
- Require a public comment period of 45 days prior to the adoption or amendment of the Public Participation Plan.
- Develop and tailor public participation plans according to the complexities of particular plans, programs or projects.
- Ensure compliance with Title VI of the Civil Rights Act of 1964 and subsequent federal legislation, which require that no person in the United States shall, on the ground of race, color, national origin, sex, age and/or disability be excluded from participation in, be denied the benefits of, or be subjected to discrimination under



any program or activity receiving federal financial assistance. Therefore, policies should be adopted with specific plans and programs to ensure that the needs of those traditionally underserved by existing transportation systems and Environmental Justice principles are fully integrated in the process.

- Engage the public in a proactive effort by going to civic and cultural groups, churches, neighborhood organizations, and other citizen committees.
- Show consideration to comments from public participants and respond to public input received during the planning and program development processes.

## Key Considerations for Effective Public Participation

An effective public participation process is characterized by a well-informed public with opportunities to contribute into the decision-making process through diverse participation opportunities and procedures. A successful process is responsible for building public trust and support of transportation plans and investments. The whole process is proactive, providing information, timely public notice, full public access to key decisions, and opportunities for early and continuing participation [23 CFR 450.212(a) and 450.316(b)(1)]. Impacts that may not have been anticipated by transportation planners and decision-makers can be identified during a meaningful public participation process.

There are some elements that should be considered for achieving an effective public participation process. Purposes and objectives have to be clearly defined before initiating a public meeting on transportation programs, and the affected public and stakeholders have to be identified specifically for each plan and project that is under development. It is important to determine effective techniques and procedures to engage the targeted public in the process and how to notify these groups of the participation opportunities. It is essential to educate and assist the public, making sure



that there is full understanding of transportation issues and the various solutions related to each plan or project. Transportation planners and decision-makers have to demonstrate that public opinions were seriously considered. When significant oral or written comments have been received as the result of public participation efforts, a summary analysis and report on the disposition of comments are to be made a part of the final document. Finally, there has to be an evaluation of the whole process based on the achievement of the objectives and feedback from the public. The outreach and participation activities that work best can be maximized in future efforts to obtain as much input as possible. Interested parties are encouraged to, either during the formal review period or any time during the planning process, review the Public Participation Plan and suggest revisions.

## Public Participation Procedures

Several techniques for expanding public awareness of transportation planning issues have been identified. This section gives an overview of these techniques aiming to help transportation planners and decision-makers choose the best activities according to their goals, target audience, and cost considerations. *Table 1*, adapted from the Minnesota Department of Transportation<sup>3</sup>, lists the overall public participation objectives followed by general methods of participation and then specific techniques.

INCOG maintains a website where citizens can review information posted and send comments via online forms and email. The website hosts information of interest to the public: meeting schedules and agendas, the MTP, the updated TIP, planning products available from INCOG, and demographic and traffic data. A brochure with a brief description of the regional transportation planning process is also published and

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<sup>3</sup> Minnesota Department of Transportation, *Hear Every Voice: A Guide to Public Involvement at MnDOT*, June 1999.



distributed as widely as possible. In addition, the INCOG database will be used to provide citizens, affected public agencies, emergency response agencies, representatives of public transportation employees, freight shippers, providers of freight transportation services, private providers of transportation, representatives of users of public transportation, representatives of users of pedestrian walkways and bicycle transportation facilities, representatives of persons with disabilities, and other interested parties with a reasonable opportunity to comment on the MTP and TIP and become involved with the transportation planning process, as per federal regulations.

State and Federal policies and regulations, including Environmental Justice initiatives, reinforce the need of agencies to focus attention on reaching low-income and minority households. To include traditionally underserved communities in the decision-making process, it is necessary to identify key stakeholders that have low or no participation, what is preventing them from participating, and what can be done to overcome barriers and increase the levels of participation. Some explanations for the lack of participation include cultural and language barriers, disabilities, economic constraints, and lack of participation opportunities.



**Table 2 – Public Participation Objective, Methods, & Techniques**

Objective	General Method	Specific Technique
INFORM	Committees	Civic Advisory Committees (Advise) Citizens on Decision Policy Bodies (Recommend) Collaborative Task Forces (Problem Solve)
	Communication	Mailing Lists Public Information Materials (brochures, posters) Key Person Interviews Briefings Video Techniques / Telephone Techniques Media Strategies
INVOLVE	Meetings	Public Meetings/Hearings (Formal) Open Forums/Open Houses Conferences/Workshops/Retreats Lunch & Learn Meetings
	Techniques	Brainstorming Charrettes / Small Group Visioning
FEEDBACK	Establishing Places	On-Line Services / Hotlines Drop-In Centers
	Designing Programs	Focus Groups Public Opinion Surveys Facilitation / Negotiation & Mediation
PARTICIPATION	Special Techniques	Transportation Fairs Games & Contests / Role Playing Site Visits / Events Non-Traditional Meeting Places & Interactive Television Interactive Video Displays & Kiosks Computer Presentations & Simulations Teleconferencing



To ensure that cultural and language barriers are overcome, Limited English Proficiency (LEP) procedures will be implemented (*see Appendix 1, page 32*), such as making information readily available, having documents translated, and public notices broadcasted for Spanish-speaking populations. Meetings and/or public hearings shall be made accessible and user-friendly for all stakeholders, taking into consideration convenient locations and schedules. Upon request, INCOG will provide appropriate accommodations for citizens with hearing and/or sight impairment. Effective participation, education, and communication shall be tailored to specific non-traditional transportation stakeholders and problems.

Federal legislation and regulations' provisions require expanded consultation and cooperation with Federal, State, Local and Tribal agencies responsible for land use, natural resources, and other environmental issues. Throughout the planning process INCOG will seek to engage and will incorporate comments from such agencies, including:

- National Parks Service
- Department of Interior
- US Fish and Wildlife Service
- US Army Corps of Engineers
- US Environmental Protection Agency
- US Geological Survey
- Forest Service (US Department of Agriculture)
- Oklahoma Parks and Wildlife
- Oklahoma Historical Society
- Oklahoma Department of Environmental Quality (ODEQ)
- Local Land Use Plans (Counties and Cities)
- Local Historical Agencies



- Local Parks and Recreation Departments
- Homeland Security
- Bureau of Indian Affairs
- Cherokee Nation
- Creek Nation
- Osage Nation

INCOG will develop the listing of “interested parties” to be engaged during public comment periods to include:

- Citizens
- Affected Public Agencies
- Representatives of Public Transportation Employees
- Freight Shippers
- Providers of Freight Transportation Services
- Private providers of transportation
- Representatives of users of public transportation
- Representatives of users of pedestrian walkways and bicycle transportation facilities
- Disability Advocacy Groups
- Other interested parties

INCOG will seek to engage these segments of the community and incorporate their comments throughout the planning process. INCOG will also undertake appropriate consultant and coordination activities with agencies related to safety planning and security planning. Appropriate consideration of these two factors will be included in all projects and planning activities.



## Documents, Reports, and Publications

One of the most essential responsibilities of the INCOG is the continual development or updating of several core products that guide the transportation planning process. The various documents, reports, and publications INCOG produces provide policy and technical information that the public needs in order to make more informed contributions. INCOG will make these plans and policy documents available to the public at meetings, on INCOG website at [www.incog.org](http://www.incog.org), in person or by mail upon request, and at other appropriate locations and public meetings around the region.

**Table 3 – Adoption Notification and Public Review Summary**

		Schedule	Public Meeting Notice	Public Review and Comment Period
<b>Adoption</b>				
<b>MTP</b>	Metropolitan Transportation Plan	Every 5 years	1-5 days	14 days
<b>TIP</b>	Transportation Improvement Program	Every 2 years	1-5 days	14 days
<b>UPWP</b>	Unified Planning Work Program	Every year	1-5 days	14 days
<b>PPP</b>	Public Participation Plan	Every 6 years	1-5 days	45 days
<b>Amendments</b>				
<b>MTP</b>	Metropolitan Transportation Plan	As needed	1-5 days	14 days
<b>TIP</b>	Transportation Improvement Program	Quarterly	1-5 days	14 days
<b>UPWP</b>	Unified Planning Work Program	As needed	1-5 days	14 days
<b>PPP</b>	Public Participation Plan	As needed	1-5 days	45 days



## Metropolitan Transportation Plan (MTP)

The Metropolitan Transportation Plan (MTP) has at least a 20-year horizon and is necessary for the effective programming and implementation of transportation improvements. The MTP is predicated on demographic and economic assumptions and forecasts for the region. It identifies the various transportation systems: roadways, public transportation (or transit), bicycle/pedestrian, and freight systems desired for the metropolitan community, as well as how the transportation modes interrelate with each other. The MTP summarizes the costs of the investments that will be needed, the resources necessary and expected to achieve the recommended improvements, and the resulting effects or impacts such investments will produce. The long range MTP serves as a guide for the investment of local, state, and federal resources and becomes a component of the Oklahoma Statewide Intermodal Transportation Plan. It also serves as the foundation for plans to improve the overall transportation system.

Public participation is an integral part of the MTP, and the plan itself must reflect the desires of the communities within the region to help them attain their transportation goals. To this end, INCOG, in addition to its outreach efforts, as required by federal and state laws, may interact with specific groups through techniques aiming to inform, involve, give feedback, and achieve significant participation, as outlined in *Table 4* (page 22):



**Figure 4** MTP Public Meeting, Central Library, 2022



**Table 4: Specific Groups for MTP Outreach Efforts**

<b>Neighborhood/Homeowners' Associations</b>	<b>Particularly groups that are directly affected by a proposed project</b>
<b>Business Professionals</b>	Young Professionals of Tulsa, local business leaders, Tulsa Transportation Club and similar organizations, Chambers of Commerce, etc.
<b>Youths</b>	Tulsa Community College, Tulsa Technology Center, public and private schools (elementary, middle, and high schools), boys and girls club, and others as appropriate
<b>Churches/Religious Institutions</b>	Neighborhood and/or community religious venues located in the impacted areas
<b>Media Representatives</b>	Launch a media campaign that targets reporters who have worked with INCOG in the past and forms new relationships with representatives from various media types including television, newspaper, and radio
<b>Elected Officials/Community Representatives</b>	Engage local elected officials, community planners and planning commissions on a regular basis
<b>Civic/Focus Groups and Emergency Response Agencies</b>	Speak with organizations at their regularly scheduled meetings.  Host focus retreats to encourage participation from particular organizations and businesses with a vested interest in transportation

As a part of the MTP development process, INCOG will prepare a detailed list of objectives and procedures to obtain public participation as it relates to the MTP. This detailed list will be based upon these general guidelines:



1. **Early and Continuing Public Participation** – INCOG will educate the public on the process from the beginning and continue the educational process throughout the transportation plan development. A visioning session will start the process to establish broad-based goals for the region that will reflect what is important to local residents for the future. Additionally, a contact list based upon previous public participation efforts, including civic groups, neighborhood associations, Chambers of Commerce, special interest groups, and other interested parties will be updated on a continual basis. When appropriate, INCOG will conduct PowerPoint and descriptive presentations as well as other visualization techniques to describe plans.
2. **Timely Information** – INCOG will provide information about transportation issues and processes to interested parties and citizens affected by the transportation plan. Possibilities include but are not limited to providing news releases to local media outlets, producing and mailing newsletters that will also be made available at local libraries, publishing a web-based newsletter, attending area community group meetings (Rotary Club, Kiwanis, etc.) to disseminate information, and talking with area public officials to encourage them to reach out to local civic groups within their districts.
3. **Reasonable Public Access** – INCOG will seek out opportunities to participate in existing meetings or events to educate and/or involve the public. INCOG will further provide citizens and interested parties affected by the transportation plan opportunities to view technical and policy information used in the development of the plan. This will include holding focus group sessions to review information, providing a summary of detailed demographics, and disseminating demographic details in a newsletter to be available at area libraries.
4. **Adequate Public Notice** – INCOG will provide public notice of public participation activities and public review and comment periods at key decision points. Notices of public meetings will be posted in area newspapers, libraries, social media, and on the INCOG website. Invitations will also be sent to the established contact list.



5. **Explicit Consideration and Response** – INCOG will follow the process as defined in the respective plan or program for demonstrating to the public that their input during the planning and development process was received. All comments received will be documented along with specific responses to significant comments. The comments and responses will be made available via website, newsletter, and the final document.
6. **Seeking Out and Considering the Needs of Those Traditionally Underserved** – INCOG will identify concentrations of traditionally underserved households (such as low-income and minority households that face challenges for accessing employment and other amenities) within the region and pursue opportunities to encourage public participation from these communities. INCOG will provide interpreters to overcome language barriers as needed, publish educational materials about the process in bilingual formats, and submit news releases to local media outlets that serve these groups. Other activities will be defined on a plan-by-plan basis.
7. **Periodic Review** –The effectiveness of the Public Participation Plan will be reviewed to ensure it provides full and open access to all, and portions of the process that are not meeting the needs of our constituency will be revised. After a public participation activity has taken place, INCOG will evaluate its effectiveness and incorporate desired changes based upon that evaluation.

As part of these general guidelines, there will be a 14-day comment period before the MTP will be formally adopted or amended. In addition, public notices will be published in local newspapers, and press releases will be sent to local media prior to public review periods and hearings. All INCOG Transportation Technical Committee, Policy Committee, and Board of Directors meetings are open to the public, and all public meetings are held at handicap-accessible locations.



## How is the Public Involved in an MTP?

- Throughout the development of an MTP, public workshops, surveys, and online announcements will be used to present information and gather public feedback. The types of outreach tools and opportunities may vary from one update to the next, but the details on public participation opportunities will be defined and publicized in advance of the events.
- Once INCOG has developed a draft of the updated MTP, a 14-day public comment period will be held for you to review and provide your comments.
- INCOG documents all the comments shared in the public workshops, surveys, and other public forums. The comments are then reviewed and analyzed to better understand your needs.
- Members of the public have an opportunity to provide feedback at the advisory committee meetings and Board meetings when elements of the Draft and Final MTP documents are discussed and eventually adopted.

## Transportation Improvement Program (TIP)

The Transportation Improvement Program (TIP) describes all federally funded transportation projects or programs that will be carried out over the next 3 - 5 years. These projects or programs must be derived from the MTP, and therefore, the TIP is an implementation tool of the MTP. The TIP is developed every two years and lists projects beginning with the subsequent federal fiscal year. INCOG develops the TIP for the Tulsa TMA in cooperation with ODOT, the Metropolitan Tulsa Transit Authority (MTTA), airports and local governments in the TMA. Because the TIP is a short-term program, it has a relatively immediate impact on the transportation system in the region; therefore, an informed and involved public is essential in setting the priorities in the TIP. The TIP development and amendment process satisfies MTTA's and FTA's public participation requirements for the Program of Projects/POP.



As a part of the process of developing the TIP, INCOG will conduct:

1. **Specific Outreach** – Notify in writing individuals, organizations and associations, partner agencies, and local governments at the initiation of the TIP development. This notification will include a description and timeline of the development process, a general outline of the programs and types of projects affected, and a detailed description of the opportunities for input and review. INCOG plans to attend local events, such as Tulsa State Fair, MayFest, and various community markets for public interaction and feedback.
2. **Media Relations Activities** – Send press releases and legal notices to the local media at the initiation, preliminary, and final approval stages of the TIP development. Articles will be submitted for inclusion in various organization-based publications.
3. **Public Meetings** – Public meetings, either in person or online, of the TAC and TPC will be held to allow opportunities for public comment prior to the TIP advancing to the next stage of development.
4. **TIP Online** – The draft TIP and final TIP will be posted on the INCOG website and INCOG Newsletter with an email link allowing for comments or questions to be submitted. Once the TIP is adopted, a current copy will be maintained on the website reflecting the most recent amendments and progress and/or any delay in implementing the TIP.



There will be a 14-day comment period before the TIP will be formally adopted or amended. All TTC, TPC, and Board of Directors meetings are open to the public and are held at handicap-accessible locations.

### How is the Public Involved in the TIP?

- Keep up to date: Subscribe to the INCOG's Newsletter, when the Draft TIP document is completed, a public notice is advertised announcing its availability for a 14-day public review and comment period.
- Attend an MPO meeting: During the public review period, the Draft TIP is presented at public meetings and to the MPO advisory committees.
- Members of the public can provide feedback at the MPO advisory committee and Board meetings when the elements of the Draft and Final TIP documents are discussed.

## The Unified Planning Work Program

The Unified Planning Work Program (UPWP) annually documents the planning activities and projects to be accomplished in the next fiscal year. It includes a description of the work activities, the responsible agencies, and the funding sources and amounts. As a minimum guideline, INCOG will provide a 14-day proactive opportunity for public review and discussion of the UPWP through public meetings and the INCOG website.



### How is the Public Involved in the UPWP?

- Let us know your thoughts during the plan development and public comment periods. The UPWP development process consists of public engagement opportunities, such as informational meetings and a 14-day public review and comment period.
- The Draft UPWP goes before the advisory committees for feedback and is presented to the Board for final approval.
- Members of the public can provide feedback at the advisory committee and Board meetings when the elements of the Draft and Final UPWP documents are discussed.

### Other Transportation Programs and Projects

Additionally, there will be other programs and projects not yet identified that will be initiated by INCOG in the course of the transportation planning process. The first step in these programs or projects will be developing a process for informing and including the public early and continually through its advancement. The fundamental basis of the Public Participation Plan will address the federal requirements and will do so in a manner suitable to the specific plan, program, or project.



# Public Participation Effectiveness Evaluation

Federal regulations require that MPOs review the Public Participation Plan periodically to determine if the objectives of the process are achieved and if adjustments are necessary to make it more effective. Several methods can be used to determine what enhancements are necessary to make meetings more accessible and information more understandable, increasing public participation in transportation decision-making. These methods can include meeting evaluation forms, public comments, surveys, or any other form of public feedback.

The following criteria will be used to determine the effectiveness of the Public Participation Plan:

1. The number of citizens' responses that occurred:
  - Types of media used to contact participants (including publications that focus on minority, disabled, youth/elderly, low-income, or LEP residents)
  - Meeting convenience (time, place, accessibility)
  - Documentation of demographics of participants making sure that a representative group of the community in the planning area is involved.
2. The input received demonstrates citizen understanding:
  - Effectiveness of communication tools
  - Types of techniques used
  - Input received from the citizens, decision-makers, and funding agencies provided with reliable and useful information
3. The public process was responsive:
  - Documentation of how public input affected decisions



- Evaluation of the effectiveness of the program from participants' perspective (feedback)
- Participation process tailored to specific community needs and accessible to all segments of the public
- Efforts to improve performance

4. Environmental Justice was achieved:

- Strategies for engaging minority, disabled, youth/seniors, low-income, and LEP populations in the decision-making process
- Utilization of media targeted to minority, disabled, youth/elderly, low-income, and LEP populations
- Reduction of participation barriers for non-traditional transportation stakeholders
- Feedback from minority, disabled, youth/ seniors, low-income, and LEP participants
- Consideration and documentation of their concerns and input in the decision-making process

A public participation evaluation form based on these criteria will be completed at the conclusion of each event or public review period. At each event, a short anonymous survey including voluntary questions (attendees' demographic information, primary language, household income, and how participants were informed of the meeting) will be distributed. To improve the value of the Public Participation Plan while minimizing its costs, a value methodology review will be conducted annually on the PPP. Together, these methods of data collection will allow a thorough evaluation and encourage brainstorming for improved future events.



The Public Participation Plan is dynamic and must remain so to address the needs of the community. As techniques are proven effective and institutionalized, the process will evolve to reflect those advancements. Participating stakeholders and INCOG staff will immediately assess the effectiveness of every public participation activity. Revisions to the process will be promptly incorporated. The TTC, TPC, and INCOG Board of Directors will review revisions requiring formal amendment of the Public Participation Plan document after consultation with stakeholders and a thorough opportunity for public review. To ensure the process is periodically evaluated, INCOG will, at a minimum, review and assess the process and results every two years and recommend any revisions that may be appropriate.



## Appendix 1: Specific Environmental Justice and Limited English Proficiency (LEP) Considerations

State and Federal policies and regulations, including Environmental Justice initiatives, reinforce the need of agencies to focus attention on reaching low-income and minority households. There are many individuals whose primary language is not English. Individuals who do not speak English as their primary language and who have a limited ability to read, write, speak, or understand English can be “Limited English Proficient”, or “LEP.” This language barrier may prevent individuals from accessing services and benefits. To include traditionally underserved communities in the decision-making process, it is necessary to identify key stakeholders that have low or no participation, what is preventing them from participating, and what can be done to overcome barriers and increase the levels of participation. Some explanations for the lack of participation include cultural and language barriers, disabilities, economic constraints, and lack of participation opportunities.

There are two pieces of legislation that provide the foundation for the development of an LEP plan: Title VI of the Civil Rights Act of 1964, and Executive Order 13166. In some circumstances, failure to ensure that LEP persons can effectively participate in federally assisted programs may constitute discrimination based on national origin under Title VI. To comply with Title VI, agencies should take reasonable actions for competent language assistance. Executive Order 13166 clarifies requirements for LEP persons under Title VI. The Executive Order requires the agency to examine the services it provides and develop and implement a system by which LEP persons can meaningfully access those services.

According to 2017-2021 ACS data, 20,530 people (2.51%) in the Tulsa TMA speak a language other than English at home. To reach the LEP population, a four-factor analysis outlined in the Department of Transportation policy guidance will be followed:

1. The number or proportion of LEP persons eligible to be served or likely to encounter by a program, activity, or service of the recipient or grantee.
2. The frequency with which LEP individuals come in contact with the program.



3. The nature and importance of the program, activity, or service provided by the recipient to people's lives.
4. The resources available to the recipient and costs.

## The Four-Factor Analysis

### Factor 1: The Proportion, Numbers and Distribution of LEP Persons

The Census Bureau has two classifications of how well people speak English. The classifications are 'very well' and 'less than very well'. For our planning purposes, we are considering people that speak English 'less than very well' as Limited English Proficient (LEP) persons.

**Table 1**

**LANGUAGE SPOKEN AT HOME BY ABILITY TO SPEAK ENGLISH FOR THE POPULATION 5 YEARS AND OVER - Universe: Population 5 years and over**

	Population 5 years old and older	Number of Limited English Proficient Persons	Percent of Limited English Proficient Persons
Creek County, Oklahoma	67,519	426	0.63%
Osage County, Oklahoma	43,741	94	0.21%
Rogers County, Oklahoma	89,208	563	0.63%
Tulsa County, Oklahoma	618,086	18,905	3.06%
Wagoner County, Oklahoma	75,826	806	1.06%

Source: U.S. Census Bureau, 2017-2021 ACS Data File

*Table 1* shows the number and percent of persons regarding their English language skills for the counties within the MPO Metropolitan Planning Area. Of the population 5 years old and older, 20,794 persons or 2.32% are LEP.



**Table 2**

**LANGUAGE SPOKEN AT HOME BY ABILITY TO SPEAK ENGLISH – Universe: Population 5 years and over**

	Creek County, OK	Osage County, OK	Rogers County, OK	Tulsa County, OK	Wagoner County, OK
Total Population 5 yrs and over	<b>67,519</b>	<b>43,741</b>	<b>89,208</b>	<b>618,086</b>	<b>75,826</b>
Speak only English	65,141	42,529	84,297	525,127	70,320
Spanish or Spanish Creole	1,787	689	2,731	64,156	3,705
Speak English less than “very well”	510	167	856	24,919	1,227
Indo-European languages	161	137	596	7,966	506
Speak English less than “very well”	30	9	58	1,670	141
Asian and Pacific Islands Languages	237	134	1,120	15,571	1,045
Speak English less than “very well”	152	-	326	7,973	455
Other and unspecified languages	193	252	464	5,266	250
Speak English less than “very well”	34	86	96	986	50

Source: U.S. Census Bureau, 2017-2021 ACS data

According to *Table 2*, of the LEP persons within the Tulsa MPO Area, 8.8% speak Spanish, 1.1% speaks Indo-European languages, 2.2% speaks Asian languages, and 0.7% speaks other languages.



**Table 3****HOUSEHOLD LANGUAGE BY HOUSEHOLD LIMITED ENGLISH-SPEAKING STATUS**

<b>Table C16002</b>	<b>Creek County, Oklahoma</b>	<b>Osage County, Oklahoma</b>	<b>Rogers County, Oklahoma</b>	<b>Tulsa County, Oklahoma</b>	<b>Wagoner County, Oklahoma</b>
Universe: Households					
<b>Total</b>	<b>27,031</b>	<b>16,824</b>	<b>34,465</b>	<b>260,639</b>	<b>29,280</b>
English only	25,809	16,275	32,330	223,664	27,111
Spanish	767	285	1,086	23,341	1,382
Limited English speaking household	98	7	155	5,088	140
Not a limited English speaking household	669	278	931	18,253	1,242
Other Indo-European languages:	142	95	300	4,761	233
Limited English speaking household	-	5	6	292	12
Not a limited English speaking household	142	90	294	4,469	221
Asian and Pacific Island languages:	156	37	434	5,995	397
Limited English speaking household	98	-	46	1,669	56
Not a limited English speaking household	58	37	388	4,326	341
Other languages:	157	132	315	2,878	157
Limited English speaking household	4	-	19	158	10
Not a limited English speaking household	153	132	297	2,720	147

*Table 3* shows the number of households by language spoken for the counties that are part of the Tulsa MPO. As seen in *Table 1*, Creek County and Osage County together have 520 persons that are linguistically isolated. Rogers County has 563 persons while Wagoner



County has 806 persons that are linguistically isolated. Tulsa County has the majority of the LEP, with 18,905 persons.

The map below shows the distribution of non-English speaking people. LEP persons residing in Osage County are located in one census block group in the southern portion of the county. In Rogers County there are several areas with LEP persons. There is a cluster within the City of Owasso, Catoosa, and Claremore. The largest cluster of LEP persons is located along the eastern portion of the Tulsa County portion of the MPO Area.



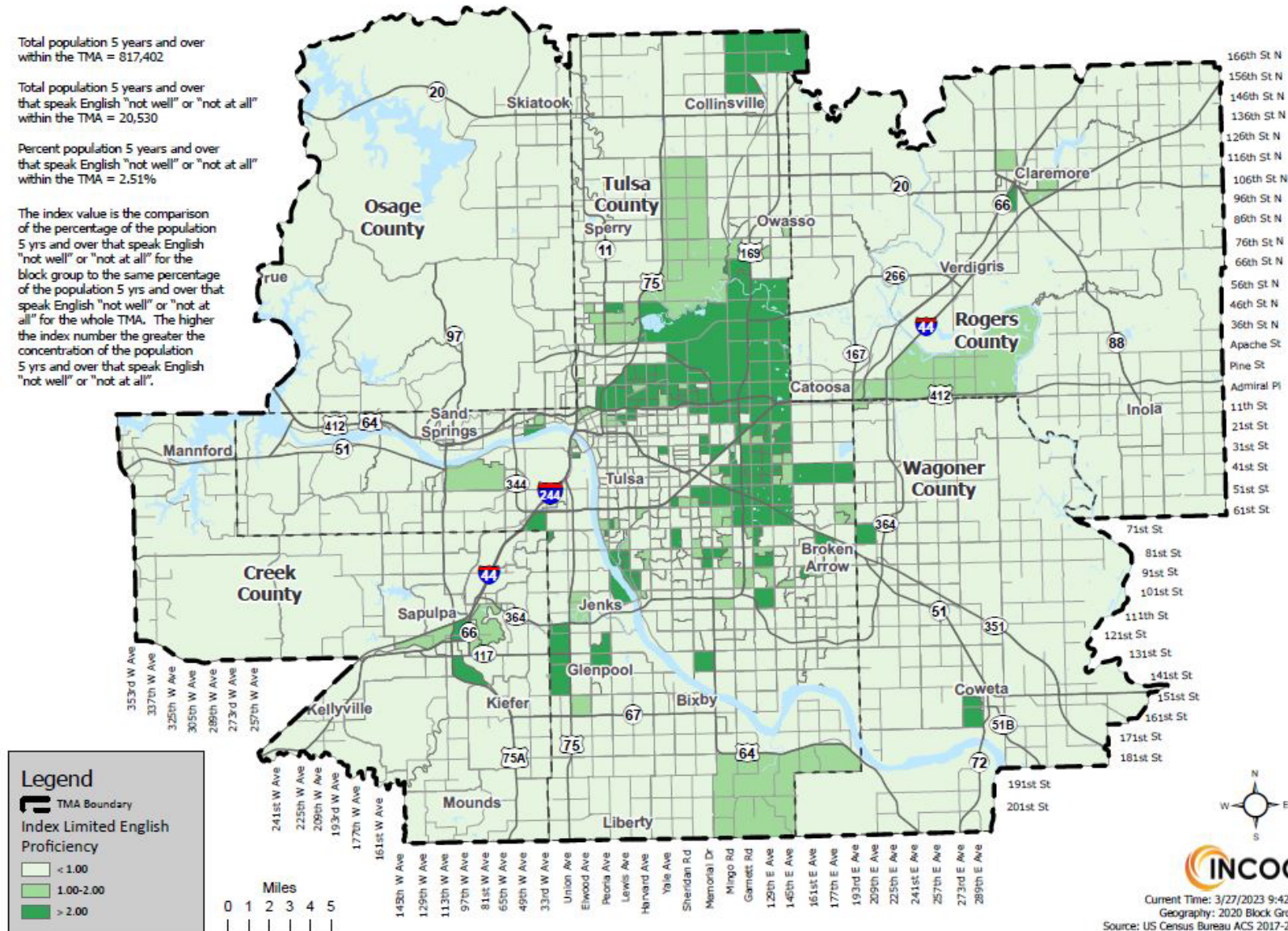
# Limited English Language Proficiency Population Concentrations within the Transportation Management Area

Total population 5 years and over within the TMA = 817,402

Total population 5 years and over that speak English "not well" or "not at all" within the TMA = 20,530

Percent population 5 years and over that speak English "not well" or "not at all" within the TMA = 2.51%

The index value is the comparison of the percentage of the population 5 yrs and over that speak English "not well" or "not at all" for the block group to the same percentage of the population 5 yrs and over that speak English "not well" or "not at all" for the whole TMA. The higher the index number the greater the concentration of the population 5 yrs and over that speak English "not well" or "not at all".





## **Factor 2: Frequency of Contact with LEP Individuals**

INCOG's public participation process is designed to be open, inclusive, and comprehensive. The major transportation planning documents – Long Range Transportation Plan, TIP, Public Transit – Human Service Coordinated Transportation Plan, and other major transportation studies are made available at numerous locations and times to allow access and input to as many different populations as possible.

For the Long-Range Transportation Plan, INCOG holds several stakeholders' meetings to brainstorm each element of the Plan, Bike/Pedestrians, Freight, Transit, and Roadways. Meetings are also held in several cities in the region to gather community feedback. The purpose is to hear about needs and preferences for transportation in the TMA. Materials, available in both English and Spanish versions, are posted on the INCOG Web site, e-mails are sent, and notices are distributed to local media publications. With Covid-19, INCOG is taking the appropriate measures to make sure staff and the members of the community can still participate in the planning process while keeping them safe.

Careful thought and planning are given at every level and every activity to achieve maximum involvement and reach underserved populations. Any request for Spanish versions of materials is granted. Translation and interpreter services have been used as needed. There have not been many requests in the last three years. It is likely, however, that there will be an increase in requests since the Hispanic population is growing in the TMA.

## **Factor 3: The Nature and Importance of the Program, Activity, or Service to LEP Community**

As the agency responsible for coordinating the regional transportation planning process, INCOG must make sure that all segments of the population, including LEP persons, have been involved or have had the opportunity to be involved with the planning process. The impact of proposed transportation investments on underserved and underrepresented population groups is part of the evaluation process. INCOG provides oversight and helps ensure that LEP and other disadvantaged population groups are not overlooked in the transportation planning process.



INCOG's main function is to support cooperative, comprehensive, and continuing transportation planning as outlined in Federal transportation acts. In doing so, INCOG develops three main documents – the Long-Range Transportation Plan, the Transportation Improvement Program (TIP) and Unified Planning Work Program (UPWP), as well as other studies. The Long-Range Transportation Plan provides direction for transportation investments out to 20 years in the future. The TIP is a program or schedule of short-range transportation improvements and activities intended to be implemented through a combination of State, Federal and local funding. The UPWP outlines tasks to be performed in the upcoming year.

INCOG is also the designated recipient for Section 5310 (Enhanced Mobility of Seniors and Individuals with Disabilities). One of the primary responsibilities of the designated recipient is the development of a Public Transit – Human Service Transportation Coordinated Plan. This plan is also a primary planning document that is reviewed by the Transportation Technical and Policy Committees and endorsed by the INCOG Board of Directors. See *Section 3.6 on page 42* for Section 5310 Programs Implementation.

INCOG uses Federal funds to plan for transportation projects and does not provide any direct service or program that requires vital, immediate, or emergency assistance, such as medical treatment, or services for basic needs, such as food or shelter. Lack of access of LEP persons to public transportation may, however, affect their ability to obtain crucial services such as health care, education, and employment.

#### **Factor 4: The Resources Available to the MPO and Overall Cost**

Outreach strategies to ensure all communications and public participation efforts comply with Title VI include:

- Coordination with individuals, institutions, or organizations to reach out to members in the affected minority and/or low-income communities.



- Follow LEP and Persons with Disabilities guidelines to ensure information is available in a variety of formats and provide notice to participants that LEP and other assistance is available upon request.
- Provide information in languages other than English, as needed. Maintain an inventory of translation services in the Tulsa area, especially resources for Spanish-speaking residents. Publish meeting notices in Spanish in Hispano de Tulsa and La Semana Del Sur.
- Provision of opportunities for public participation through means other than written communication, such as personal interview or use of audio or video recording devices to capture oral comments.
- Use of locations and facilities that are local, convenient, and accessible to identified populations.
- Hold meetings and events during the day, at night, and on weekends to encourage participation from identified populations.
- Use of different meeting sizes or formats, including small group exercises that encourage full participation from each individual.
- Disseminate information to minority median and ethnic/gender related organizations, to help ensure all social, economic, and ethnic interest groups in the region are represented in the planning process.
- Provide assistance to persons with disabilities, including individuals who are blind, have low-vision, or are hearing impaired.



- Provide continued training in nondiscrimination, outreach, equitable planning/research, and foreign language skills for INCOG staff.

In all activities, INCOG Transportation Planning will seek out and consider the viewpoints of LEP, minority and low-income populations. Because there is wide latitude in determining what specific measures are most appropriate, the determination will be based on the composition of the population affected by the planning program/project, the type of public participation process planned, and the resources available to the agency. INCOG staff will also continue correspondence with organizations that represent LEP, minority, disabled, youth, elderly, and low-income residents. Additional innovative strategies will be researched and developed to ensure all residents are aware of the outreach process in which they are able and encouraged to participate.

INCOG has public participation funds included in the MPO annual budget. Fees for translation services, interpreter services, and LEP advertisement services are included in the eligible public participation expenses. Costs are estimated to be up to \$2,000 including staff time for providing language assistance.

## Language Assistance Plan

The “Four Factor” Analysis was key to determine if interpretation and translation of documents needs to be performed to ensure INCOG’s programs participation by persons with Limited English Proficiency (LEP). With this analysis it was possible to determine what languages are most commonly used by LEP populations in the Tulsa TMA. According to *Table 2*, of the LEP persons within the Tulsa MPO Area, 8.8% speak Spanish. It is likely that there will be an increase in requests for Spanish translations since the Hispanic population is growing in the TMA.

To assist the LEP populations in the Tulsa TMA and assure that persons with limited ability to speak, read, write, and understand the English language participate in all INCOG’s programs, the following elements will be implemented:



1. INCOG will develop a list of vital plans and documents that require translation.  
Webpages considered essential for public participation should also be translated.  
Google Translate may be utilized to provide immediate access to translation.
2. Public participation meetings notices will be posted in accessible locations both in English and Spanish with INCOG's contact for further assistance to other languages translation.
3. INCOG will keep a database of personnel with foreign language skills that will be posted on INCOG's website and internal website.
4. Once a year, INCOG personnel will be trained on how to effectively provide assistance to the LEP population and how to use telephone translation services when needed.
5. A language chart will be available to help identify what language an LEP person speaks and will be located in public areas.
6. The public will be notified of the availability of translation services for all public meetings. Upon request, interpreters will be made available to assist LEP people.
7. INCOG will forward emails written in foreign languages for translation and an interpreter will provide assistance to the sender.
8. INCOG will maintain the "Four Factor" Analysis updated to monitor and evaluate the Language Assistance Plan and to keep it updated to better serve the LEP population. Vital documents can then be translated into the language of each frequently encountered LEP group eligible to be served and/or likely to be affected by INCOG's programs and services.