

WRCCOG Public Participation Plan



WACCAMAW
R E G I O N A L
COUNCIL OF GOVERNMENTS



RURAL PLANNING ORGANIZATION

Fiscal Years 2020-2022

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LIST OF ACRONYMS

ALOP	Annual List of Obligated Projects
FAST Act	Fixing America's Surface Transportation Act
GSATS	Grand Strand Area Transportation Study
PPP	Public Participation Plan
RLRTP	Rural Long Range Transportation Plan
RPO	Rural Planning Organization
RPWP	Rural Planning Work Program
SAFETEA – LU	Safe Accountable Flexible Efficient Transportation Equity Act: Legacy for Users
SCDOT	South Carolina Department of Transportation
STIP	Statewide Transportation Improvement Plan
TIP	Transportation Improvement Program
WRCOG	Waccamaw Regional Council of Governments

INTRODUCTION

The Waccamaw Regional Council of Governments (WRCOG) Rural Planning Organization's (RPO) policy is to support and encourage public participation and to adhere to the principles of Environmental Justice in the rural planning process. The Public Participation Plan (PPP) describes how WRCOG will disseminate information regarding the rural transportation program. The RPO's public participation policy is designed to ensure opportunities for the public to express its views on transportation issues and to become active participants in the decision-making process.

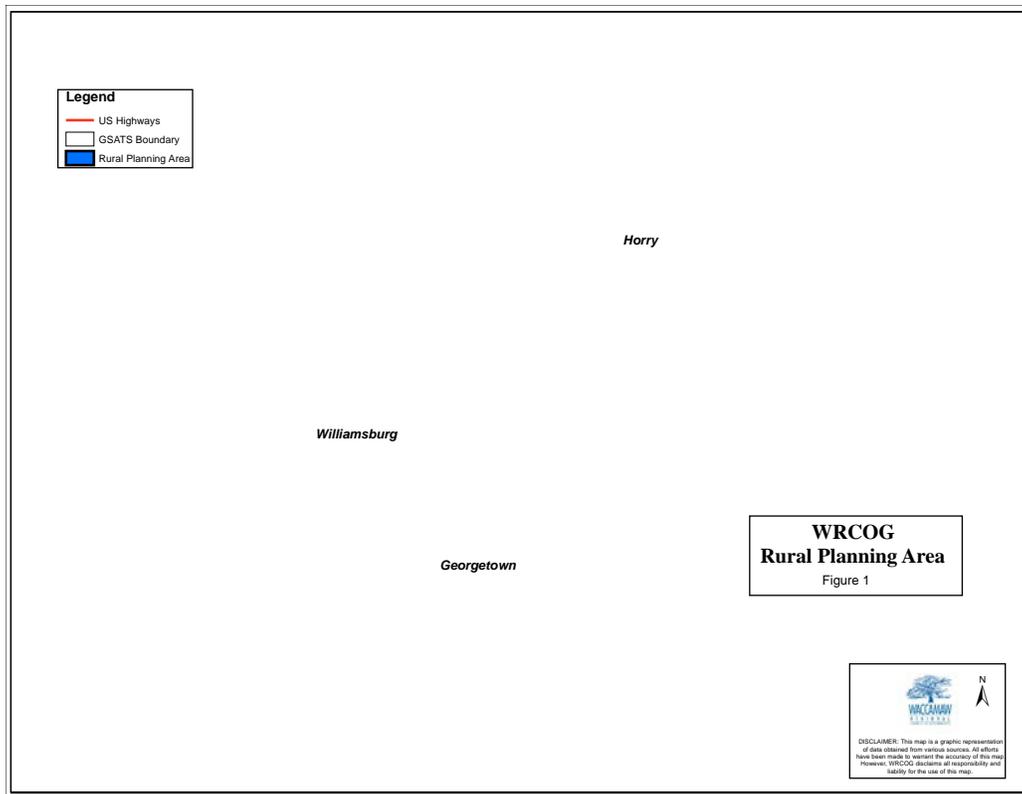
I. BACKGROUND

WRCOG is a regional public agency created by Horry, Georgetown, and Williamsburg counties, as enabled by state planning law. The agency provides planning, management, and technical assistance to its member governments and local transit service providers. South Carolina Department of Transportation (SCDOT) has designated WRCOG to serve as the RPO for the three-county region. The RPO is responsible for staffing the area-wide transportation planning organization.

WRCOG's primary decision making body is the Board of Directors, which also serves as the Policy Committee for the RPO. The Board is comprised of twenty-five (25) members representing the local governments in the WRCOG region. This Board meets regularly to establish policies and evaluate the needs for the region. The rural transportation program work of the Board is supported by RPO technical staff and the standing advisory committee referred to as the Rural Technical Committee (RTC).

The RPO technical staff consists of professional planners and administrative staff. The RTC is made up of state, county, and city planning and engineering staff, which provide technical expertise in the development of transportation plans and programs for the rural area. On an ongoing basis the RPO staff and RTC provide recommendations to the Board regarding short and long range planning, implementation of projects, and related issues. The Board may also appoint ad hoc committees (working groups) to oversee rural planning projects or studies. The Board and RTC operate under RPO bylaws approved by the Board.

The rural area is defined by the three-county region which is not contained within the GSATS boundary. The rural portion includes Southern and Western Georgetown County, Western Horry County and all of Williamsburg County. The local governments that fall into the rural area are: Andrews, Aynor, Greeleyville, Hemingway, Kingstree, Lane, Loris, and Stuckey. The following map indicates the RPO and GSATS boundary.



The principal responsibilities of the RPO include the development and maintenance of a Rural Long Range Transportation Plan (RLRTP), a Rural Transportation Improvement Program (Rural TIP), a Rural Planning Work Program (RPWP), and related planning studies and projects deemed necessary to address transportation issues in the RPO area. Local transportation needs in the rural area are re-evaluated annually, and based on this evaluation, project priorities are established and made part of the Rural TIP. This information is forwarded to SCDOT for inclusion into the Statewide Transportation Improvement Program (STIP).

By federal law, all multi-modal transportation improvement projects must be included in and be consistent with (to the maximum extent feasible) the RPO’s RLRTP in order to be eligible for federal funding. Therefore, the RPO RLRTP is the primary plan that guides all federally funded transportation improvements in the rural area.

II. GOVERNMENTAL REQUIREMENTS

Based on federal guidance, transportation planning at the statewide level should incorporate or consider various factors or objectives. The most recent transportation act, Fixing America’s Surface Transportation (FAST) Act, retains the eight (8) planning factors contained in the previous MAP 21 transportation act and has added two (2) factors to consider. These include:

1. Support the economic vitality of the metropolitan area, especially by enabling global competitiveness, productivity, and efficiency;
2. Increase the safety of the transportation system for motorized and non-motorized users;
3. Increase the security of the transportation system for motorized and non-motorized users;
4. Increase the accessibility and mobility of people and for freight;
5. Protect and enhance the environment, promote energy conservation, improve the quality of life, and promote consistency between transportation improvements and state and local planned growth and economic development patterns;
6. Enhance the integration and connectivity of the transportation system, across and between modes, for people and freight;
7. Promote efficient system management and operation; and
8. Emphasize the preservation of the existing transportation system.
9. Improve resiliency and reliability of the transportation system and reduce or mitigate stormwater impacts on surface transportation; and
10. Enhance travel and tourism.

In addition to pursuing the ten (10) planning factors, RPOs are required to develop and adopt a long-range transportation plan, a transportation improvement program, and performance measures for safety and bridge/road conditions. In developing these documents, by federal statute, a reasonable opportunity for the public to comment must be provided.

III. PUBLIC PARTICIPATION PROCESS

A. General Guidelines

The WRCOG Rural PPP is intended to provide direction for public participation activities to be conducted by the RPO and contains the vision, goals, objectives, and techniques used by WRCOG for public participation. WRCOG will strive to:

1. Provide timely information about transportation issues and processes to citizens, affected public agencies, representatives of transportation agencies, 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 the disabled, and other interested parties and segments of the community affected by transportation plans, programs, and projects (including but not limited to local jurisdictional concerns).

2. Provide reasonable public access to technical and policy information used in the development of the RLRTP, Rural TIP, RPWP, and other appropriate transportation plans and projects, and conduct open public meetings where matters related to transportation programs are being considered. Such access would also include, if necessary, the conversion of the key planning documents into Spanish (or other languages).
3. Give adequate public notice of public participation activities and allow time for public review and comment at key decision points, including but not limited to, the approval of the RLRTP, TIP, RPWP, and other appropriate transportation plans and projects. If the final draft of any transportation plan differs significantly or raises new material issues which interested parties could not reasonably have foreseen, there shall be an additional opportunity for public comment.
4. Respond in writing to all applicable public input. When significant written and oral comments are received on the draft transportation plan (including the financial plan) as a result of the public participation process, a summary, analysis, and report on the disposition of comments shall be made part of the final plan.
5. Solicit the needs of those traditionally under-served by existing transportation systems, including, but not limited to, minorities, elderly, persons with disabilities, persons with limited English proficiency, and low-income households.
6. Provide a public comment period of forty-five (45) calendar days prior to the adoption of the RPO Public Participation Plan for the groups listed in Item 1 above. Notice of the 45-day comment period will be advertised on the WRCOG website, at the public libraries, in a newspaper of general circulation, minority community publications, or radio announcement prior to the commencement of the 45-day comment period. Notice will also be sent to the RPO mailing list prior to the commencement of the 45-day comment period.
7. Provide a public comment period of not less than thirty (30) calendar days prior to final adoption of the RLRTP, TIP, RPWP, Transit Development Plans, any amendments or updates, and other appropriate transportation plans and projects.
8. Coordinate the RPO public participation process with statewide public participation processes wherever possible to enhance public consideration of the issues, plans and programs, and reduce redundancies and costs.

9. Periodically review the public participation process to ensure it provides full and open access to all. Portions of the process which are found not to meet the needs of the constituency will be revised.

B. Public Participation Plan Vision, Goals & Policies

The vision for the public participation plan is that the public will be provided thorough information on transportation planning services and project development in a convenient and timely manner. To this end, the following goals and policies have been established.

Goal 1: To actively engage the public in the transportation planning process according to the policies contained in federal and South Carolina State Law as well as in this Public Participation Plan.

- A. WRCOG shall maintain a database of contacts including, at a minimum, the following persons:
 - Federal, state, and local agencies responsible for planned growth, economic development, environmental protection, airport operations, freight movements, land use management, natural resources, and historic preservation;
 - Elected officials;
 - Local government staff;
 - Transportation agencies (freight, port, airports, transit, etc.);
 - Representatives of users of public transportation;
 - Representatives of users of pedestrian and bicycle transportation;
 - Representatives of the disabled;
 - Local media;
 - Home owners associations;
 - Civic groups;
 - Special interest groups;
 - WRCOG area public libraries (for public display); and
 - Individuals expressing an interest in transportation planning activities.
- B. WRCOG shall electronically send and/or mail meeting announcements (invitations) to the RPO mailing list or to targeted groups notifying them of upcoming activities.
- C. WRCOG may employ visualization techniques to depict transportation plans. Examples of visualization techniques include: charts, graphs, photo interpretation, maps, use of GIS, artist's renderings, physical models, and/or computer simulation.

Goal 2: WRCOG shall keep the public informed of on-going transportation related activities through the following methods:

- A. WRCOG shall make all information and publications relating to the rural transportation program available to the public via the RPO website.
- B. Staff shall be available to provide general and project-specific information at a central location during normal business hours and after hours, at the request of interested groups, with reasonable notice.
- C. WRCOG shall maintain a rural transportation section on the WRCOG website.
 1. The website shall be updated and maintained to provide the most current information available.
 2. The website shall, at a minimum, contain the following information:
 - Current RPO Technical Staff contact information (i.e. name, title, mailing address, phone, fax, and e-mail);
 - Meeting calendars and agendas;
 - Brief descriptions of current projects;
 - Work products and publications (Rural TIP, RL RTP, RPWP, Title VI/Environmental Justice Plan, RPO Bylaws, and PPP); and
 - Links to related agencies (e.g. SCDOT, Williamsburg County Transit, and Coast RTA).

Goal 3: WRCOG shall encourage the participation of all citizens in the transportation planning process.

- A. Target audiences shall be identified for each planning study conducted by the RPO, including residents, business and property owners, and those traditionally underserved and underrepresented populations, including, but not limited to, low income and minority households within the study area.
- B. WRCOG shall, whenever feasible, hold public meetings at a scheduled time, location, and building facility convenient to potentially affected citizens.
- C. WRCOG will provide an additional opportunity for public comments, if the final RL RTP or Rural TIP differs significantly from the version that was initially made available for public comment.

Goal 4: WRCOG shall strive to continuously improve public participation.

- A. WRCOG shall continuously evaluate public participation techniques, according to the procedures contained in this Public Participation Plan.

- B. The Public Participation Plan shall be reviewed and adopted, revised if necessary, at least every three (3) years.

Goal 5: WRCOG shall participate in public participation activities for individual transportation improvement projects from the planning phase through construction.

- A. WRCOG shall actively assist SCDOT, local governments, and transportation agencies in the development and implementation of public participation techniques for planning and other studies, including major investment studies, project development, and environmental studies.

IV. CURRENT PUBLIC PARTICIPATION TECHNIQUES

Public participation is an ongoing activity of the RPO. An effective public participation process is characterized by techniques and procedures that enable citizens to become well informed. This section contains descriptions of public participation tools of which WRCOG currently uses and may use in the future. These tools are as follows:

Public Informational Meetings

Description: Public meetings are generally open and informal, with project team members interacting with the public on a one-on-one basis. Short presentations may be given at these meetings. The purpose of public informational meetings is to provide project information to the public and to solicit public comment.

Activities: Corridor studies, sub-area studies, other planning studies, project priority process, certification review, RL RTP update, and other major RPO activities.

Charrettes

Description: Charrettes are typically intense, possibly multi-day meetings involving local government officials, planning officials, and local residents. A charrette is instrumental in identifying key issues early, promotes joint ownership of the solution, and attempts to diffuse traditional confrontation between stakeholders.

Activities: Project specific meetings, corridor studies, sub-area studies, other planning studies, and workshops.

Small Group Meetings

Description: During projects such as planning studies, meetings are held with small groups that have an interest in the project. Meetings could be with homeowners or neighborhood associations, civic groups, special interest groups, or other groups of affected or interested parties.

Activities: Corridor studies, sub-area studies, other planning studies, and other RPO activities.

Consultation

Description: Consistent with FAST Act regulations, consultation encourages more cooperative planning between WRCOG and appropriate agencies and officials responsible for other planning activities that are affected by transportation within the RPO area. To coordinate the planning function to the maximum extent practicable, such consultation will entail comparing RL RTPs and Rural TIPs as they are developed with the plans, maps, inventories, and planning documents developed by other agencies. This consultation will include, as appropriate, contact with the following groups: state, local, Indian Tribal, and private agencies responsible for planned growth, economic development, environmental protection, airport operations, freight movements, land use management, natural resources, consideration, and historic preservation. Other citizens, representatives, or agencies interested in being included in the consultation may contact WRCOG.

Activities: Public hearings/meetings, copies of this plan on the WRCOG website (for viewing/downloading purposes), and meetings with WRCOG staff.

RPO Website

Description: The RPO website is found within WRCOG's website, under the drop down menu "Planning" then "Transportation." The RPO site provides basic information about the RPO process, transportation planning process, and contact information. RPO publications and work products (RPWP, Rural TIP, RL RTP, PPP, Title VI/Environmental Justice Plan, and ALOP) are available for downloading from this site. On certain projects, citizens are able to submit comments. The site is maintained and updated by WRCOG staff. The website address is www.wrcog.org/transportation-planning/rpo.org.

Activities: The site is used to promote regular and special meetings, planning studies, publications, and work products.

RPO Master Database

Description: Staff maintains an ongoing master database with committee membership lists and lists of individuals with a special interest in WRCOGs' activities. The database includes names, mailing information, phone numbers, and email addresses.

Activities: The database generates distribution lists used to inform the public about public participation opportunities.

Direct Mailings and Email Announcements

Description: Direct Mailings (letters, postcards, fliers, etc.) are used to announce upcoming meetings or activities or to provide information to a targeted area, group of people, or the media. An area may be identified for a direct mailing because of potential

impacts from a project. Groups that have an interest in a specific issue, such as cyclists and pedestrians may be targeted for pathways and trail projects.

Meeting announcements and RPO information are also emailed to interested persons that have submitted their email addresses to WRCOG staff. Interactive message boards may be used to facilitate discussion and solicit public comment regarding specific transportation issues.

Activities: Project-specific meetings, workshops, open houses, corridor studies, small-area studies, other planning studies, or major activities.

Legal Advertisements

Description: SCDOT requires a minimum thirty (30) day advertisement of any public meeting where a decision could be made that would make a significant change to an existing plan or program. Ads are published to solicit public comment and/or review of the requested change or plan update. The ads provide a description of the meeting agenda, including contact information.

Activities: Corridor studies, sub-area studies, other planning studies, project priority process, major TIP amendments, updates of the RL RTP and RPWP, and other major RPO activities.

Public Notices

Description: The WRCOG Board of Directors meeting schedule is published on an annual basis.

Activities: Regular monthly meetings and other public meetings.

Visualization

Description: WRCOG recognizes that an important element to public participation is to provide the public, when possible, visual as well as written descriptions of transportation projects. Through visual imagery, the complex features of proposed transportation plans, policies, and programs can be portrayed at appropriate scales (region, local, project architecture, etc.) and from different points of view. To this end, WRCOG will utilize various visual and architectural design techniques, some of which may include: sketches, drawings, artist renderings, aerial photography, mapping, simulated photos, videos, computer modeled images, interactive geographical information system (GIS), GIS-based scenario planning tools, photo manipulation, and computer simulation.

Activities: Planning Studies, Rural TIP amendments, and other RPO activities.

Title VI & Environmental Justice Review

Title VI of the Civil Rights Act of 1964 prohibits discrimination in federally assisted programs and activities on the basis of race, color, and national origin. In 1994, Presidential Executive Order 12898 directed every federal agency to make Environmental Justice part of its mission by identifying and addressing the effects of all programs, policies, and activities on "minority populations and low-income populations." In complying with the aforementioned federal laws and policies, the RPO's Environmental Justice initiatives will strive to involve the potentially affected public. This effort develops partnerships and enhances the participation with groups and individuals of "traditionally underserved" communities in the transportation planning process. These communities include minorities, low income, the elderly, and persons with disabilities. Staff activities include, but are not limited to, RPO staff participation in groups and coalitions serving within these communities, targeted communications with local media outlets, conducting meetings at times and locations that are accessible to transit dependent or non-driving individuals when possible, and publication of RPO documents in non-technical, accessible formats when needed. The goal of the RPO's is to ensure that all citizens, regardless of race, color, religion, income status, national origin, age, or gender have an equal opportunity to participate in the RPO's decision-making process.

Description: WRCOG will take reasonable steps to ensure that all persons, including those with a disability or those encountering a language barrier, have meaningful opportunities to participate in the transportation planning and programming process, and will strive to address environmental justice issues at all stages of the planning process. This includes implementing the following strategies to reduce participation barriers for under-served groups and engage them in the decision-making process:

- MPO will make efforts to identify representatives of minority, disability, low-income, and limited English proficiency groups to include in RPO notifications.
- Key planning documents will be translated and public notices broadcasted for non-English speaking populations upon request.
- Whenever possible, meetings will be held at locations accessible to persons with disabilities, bus riders, and bicyclists and that are convenient to neighborhoods with a concentration of minority and low-income persons.
- Where meeting facilitators are used, WRCOG will seek to use persons that represent the diversity of the community and/or have expertise in working with under-served groups.
- Translators/interpreters will be provided for meetings, if requested.

Activities: Corridor studies, sub-area studies, other planning studies, RL RTP update, Title VI/Environmental Justice Plan review and updates, and other major RPO activities.

V. PUBLIC PARTICIPATION POLICIES AND GUIDELINES

A. Public Document Review, Comment, and Approval Policies

Program Adoption	Public Meetings	Comment Period	Accessibility
Rural Long Range Transportation Plan	3 Meetings (1 for each county) at different times	30 Days	Internet, WRCOG Office, Public Libraries
Rural Transportation Improvement Program	3 Meetings (1 for each county) at different times	30 Days	Internet, WRCOG Office, Public Libraries
Rural Planning Work Program	As requested	30 Days	Internet, WRCOG Office
Title VI/Environmental Justice Plan	3 Meetings (1 for each county) at different times	30 Days	Internet, WRCOG Office, Public Libraries
Public Participation Plan	As requested	45 Days	Internet, WRCOG Office, Public Libraries

B. Public Document Amendment Review, Comment, and Approval Policies

Program Amendment Adoption	Public Meetings	Comment Period	Accessibility
Rural Long Range Transportation Plan	As requested	30 Days	Internet & WRCOG Office
Rural Transportation Improvement Program	As requested	30 Days	Internet & WRCOG Office
Rural Planning Work Program	As requested	30 Days	Internet & WRCOG Office
Title VI/Environmental Justice Plan	As requested	30 Days	Internet & WRCOG Office
Public Participation Plan	As requested	45 Days	Internet & WRCOG Office

C. Public Meeting Guidelines

Open Meetings	Location	Time	Accessibility
WRCOG Board of Directors	WRCOG Office -or- Other Regional Facility	7:00 PM Monday (monthly)	ADA accessible building; Translation; and other special needs upon request
Technical Committee	WRCOG Office -or- Other Regional Facility -or- Via Conference Call	10:00 AM Wednesday (quarterly)	ADA accessible building; other special needs upon request
Ad Hoc Working Group	Various Regional Facility as decided by the Group	Various times and days	ADA accessible building; Translation; and other special needs upon request

VI. PUBLIC PARTICIPATION TECHNIQUES FOR FUTURE CONSIDERATION

Other techniques for future consideration include:

Fact Sheets

Description: Fact Sheets can be used to provide summary information regarding RPO policy, programs and projects. Fact sheets could be distributed at public meetings, on the WRCOG website, public places such as libraries and community centers, and can be requested from the RPO staff office.

Activities: Corridor studies, sub-area studies, other planning studies, project priorities process, updates to the RL RTP and Rural TIP, and other RPO activities.

Newsletter

Description: RPO staff to produce a periodic newsletter that is distributed to citizens, local governments, media, and other agencies. Citizens would be added to the distribution list by their own request. Opportunities to request being added to the list could occur during public meetings hosted by WRCOG, on the WRCOG website, and when citizens contact WRCOG staff.

Each issue of the newsletter would include staff contact information, upcoming meeting schedules, the WRCOG web site address, project highlights, current planning project status reports, or and other one-time activities are also included. Citizens will be able to sign up for the newsletter, as well as other RPO information, via the website.

Activities: The newsletter is used to report planning studies, publications, and work products from the past year.

Project-specific Newsletters

Description: For individual projects, such as corridor studies, that are typically performed using consulting services, newsletters are often used to address specific project issues. These newsletters can be posted on the RPO website. Email notifications would be sent to the distribution list from the master database. Newsletter could also be mailed to targeted residents, elected officials representing that area, businesses, and property owners in the area that are expected to be impacted by a particular study. Information regarding upcoming project meetings, alternatives being proposed in the area, and other project news is reported in these newsletters.

Activities: Corridor studies, sub-area studies, other planning studies, or major RPO activities.

Comment Forms

Description: Comment forms can be used to solicit public comment on both specific issues being presented at a workshop or other public meeting or general in nature. For example,

a comment form may ask for comments on specific alignment alternatives being considered during a corridor study, or may ask for a person's general feelings about any aspect of transportation. Comment forms could be included in publications and on websites to solicit input regarding the available information or format of the publication or website.

Activities: Public workshops, open houses, hearings, and other meetings, and general RPO activities.

Surveys

Description: Surveys can be used for gathering specific input from the public such as whether a person supports a specific alignment in a corridor study. Surveys can also be used to gather technical data during corridor and planning studies such as daily travel patterns.

Activities: Corridor studies, sub-area studies, and other planning studies.

Formal Public Hearings

Description: Formal public hearings are meetings used to solicit public comment on a project or issue being considered for adoption by the RPO. Hearings provide a formal setting for citizens to provide comments to the RPO or another decision-making body.

Activities: RL RTP and Rural TIP updates, corridor studies, project development, environmental studies, and other planning studies as needed for other RPO activities.

Posters and Fliers

Description: Posters and fliers can be used to announce meetings and events and are distributed to public places such as city halls, libraries, and community centers for display. The announcement may contain a brief description of the purpose of a meeting, the time(s) and location(s), and contact information. Posters and fliers may be used to reach a large audience that cannot be reached using direct mailings and/or newsletters.

Activities: Corridor studies, sub-area studies, other planning studies, and RPO activities.

News and Media

Description: Formal press releases could be sent to local media (newspaper, TV, and radio) to announce upcoming special meetings and activities and to provide information on specific issues being considered by the RPO or their committees.

News articles may be prepared for publication in other newsletters produced by local governments, homeowners' associations, church groups, civic groups, or

others that may have an interest in the project. These articles are subject to the publication dates and space restrictions of the individual publishers.

Activities: Specific corridor or other planning studies, sub area studies, workshops, open houses, public hearings, and other major or special RPO activities.

Government Access Television

Description: The local cable network provider as part of basic cable service maintains local channels of government and business advertisements. Government Access Television can broadcast rolling message scripts and regular and special meetings, both live and pre-recorded, as well as short informative programs about departmental activities or projects of interest to the entire population.

Activities: Corridor studies, sub-area studies, other planning studies, and RPO activities.

VII. EVALUATION METHODS, PERFORMANCE GOALS, AND IMPROVEMENT STRATEGIES

WRCOG (RPO) continually strives for improved public participation. Improvements should be made to increase public awareness and to improve the quantity and quality of information provided to the public. The decisions made by WRCOG affect both residents and visitors. Therefore, seeking public input on those decisions is vital to the success of rural transportation planning. In order to evaluate the effectiveness of the public participation tools, both a quantitative assessment of the number of participants, as well as a qualitative assessment of the level of interaction and information exchanged are necessary.

A. WRCOG will monitor public participation through various means, including:

1. Taking attendance at public outreach meetings using a sign-in sheet;
2. Keeping a log of contacts with the public, via phone, mail, email, in-person meetings, or other means, which resulted from a public outreach activity;
3. Keeping a record of attendance and involvement at RPO events;
4. Tracking the number of completed surveys or comment cards received from a public outreach event;
5. Monitoring traffic to the WRCOG website and number of RPO page views;
6. Tracking distribution of public information materials, including newsletters, and other publications;
7. Tracking number of addresses on mailing lists; and

8. Other means appropriate for the type of public outreach used.

B. Statistical Analysis

Statistics can be used to determine the outcomes of public participation tools. This evaluation can be an indicator of whether or not the tools used for public participation are actually reaching the intended audience or which tools had a greater response rates. Statistical analysis will include identifying:

- Special circumstances which may have contributed to an unusually high or low attendance.
- The nature of the notification process for the public outreach activity, including press releases, paid advertising, mailed notices, emails, phone calls, and other means.

The analysis results will be evaluated annually to assess if the public involvement techniques are effective. The evaluation will note the public involvement techniques used, the public's response, and the public involvement objectives that were met by the meeting. The result of each evaluation will be used to create a list of improvement strategies and an implementation plan. Records of the monitoring and evaluation process will be kept on file at the WRCOG office.

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