

City of Billings
Aviation and Transit Dept.



MET TRANSIT DIVISION
Public Participation Plan

10/03/2019

1 - PURPOSE

The City of Billings MET Transit Division (MET) encourages timely public involvement and participation and strives to deliver information, services and programs which reflect community values and benefit all segments of the community. This Public Participation Plan (PPP) for MET was developed to ensure that all members of the public, including minorities and Limited English Proficient (LEP) populations, have meaningful opportunities to participate in the decision making process for the transit system.

MET's public outreach strategies are designed to provide the public with effective access to information about services as well as provide a variety of efficient and convenient methods for receiving and considering public comment prior to implementing changes to services. MET also recognizes the importance of many types of stakeholders in the decision-making process, including other units of government, metropolitan area agencies, community based organizations, major employers, passengers, and the general public (including low-income, minority, LEP, and other traditionally underserved communities).

As a recipient of federal funding and pursuant to Federal Transit Administration (FTA) Title VI regulatory guidance, MET seeks out and considers the viewpoints of minority and low income populations, as well as individuals who do not speak English fluently, in the course of conducting public outreach and involvement activities. Additionally, MET offers early and continuous opportunities for the public to be involved in the identification of social, economic and environmental impacts of proposed transportation decisions.

MET may modify these public participation methods based on feedback from customers, the general public, and other interested parties. The PPP is a dynamic document that may be updated periodically to reflect changing community preferences, demographics and transit services as well as respond to new communication and outreach methods.

MET Transit functions under a wide variety of local, state, and federal regulations and requirements. The list below provides an overview of a number of these laws and regulations.

Federal Requirements:

- Americans with Disabilities Act of 1990
- Title VI of the Civil Rights Act of 1964
- Executive Order 13166 – “Improving Access to Services for Persons with Limited English Proficiency”
- Executive Order 12898 – “Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations”
- National Environmental Policy Act (NEPA)

State of Montana Requirements:

- Montana Code Annotated Title 2, Chapter 3, Part 1 “Notice and Opportunity to Be Heard” and Part 2 “Open Meetings”
- Montana Code Annotated Title 2, Chapter 6 “Public Records”

2 - GOALS

The Public Participation Plan endeavors to promote meaningful opportunities for the public (including low income, minority, and limited English proficient populations) to be involved in the identification of potential impacts of proposed transportation decisions made by MET.

Specific goals of MET's public outreach efforts include:

- **Transparency** - The process should clearly identify and communicate where and how participants may have influence and potential impact on decision-making.
- Participation - MET customers and members of the public should have opportunity to participate in key decisions and have multiple options for how they receive critical information and share feedback.
- **Accessibility** – Significant effort is made to ensure opportunities to participate are timely and physically, geographically, and linguistically accessible.
- **Diversity** - Participants represent a range of socioeconomic, ethnic, and cultural perspectives, with representative participants including residents from low-income neighborhoods, ethnic communities, residents with limited English proficiency, and other traditionally underserved people.

3 - PRINCIPLES

Public participation at MET is based on the following principles:

- **Proactive and Timely** – Participation methods should allow for early involvement and be ongoing and proactive to allow participants to potentially influence decisions.
- **Tailored** – MET's public participation methods should be tailored to match local and cultural preferences as much as possible.
- **Authentic and Meaningful** – MET should support public participation as a dynamic and meaningful activity that requires teamwork and commitment at all levels of the organization.
- **Clarity in potential for influence** - MET should communicate the factors weighing in each decision, so members of the public are clear on the potential for influence. In addition, staff should communicate the results of the public's input in terms of the impact on decisions at a broad summary level, providing major themes, decisions reached and rationale for the decisions.

The recommendations in the Public Participation Plan will be updated to reflect feedback from MET customers and the general public at the end of any communications related survey; the Plan will also be updated to include changing best practices in the field.

4 - PUBLIC INPUT POLICY

The methods described in the Public Participation Plan cover the ways in which MET engages with its customers and the general public. However, MET understands decisions about budgets as well as changes to services or fares are of particular importance, and MET therefore has the following guidelines when considering such changes:

4.1 - Major Service Changes and Fare Changes

MET will conduct public input on major service changes and fare increases. MET defines a major service change as a change that effects 25 percent or more the system's revenue hours or revenue miles

Major service changes and fare increases will meet the following public input requirements:

- Changes will be published for public review and comment no less than 60 days before the proposed changes will take effect. Notification methods may include on-board printed, digital, and audio announcements, posted notices at MET Transfer Centers or affected bus stops, and various forms of electronic communication. Information on all proposed changes will also be posted directly to the MET Transit website.
- A minimum of two public meetings will be held at various ADA accessible locations to present proposed changes and gather comments within four weeks of the published notice. The aforementioned notification methods (including on board printed, digital, and audio announcements, posted notices, and other electronic communication) will be utilized to inform the public of the date, time, and location of public meetings. Legal notices regarding the meetings will also be advertised in the local paper of record, the Yellowstone County News.
- Public comment is always welcomed, provided for, and considered at regularly scheduled City of Billings Aviation and Transit Board meetings; items such as proposed service changes, fare increases, and other items are discussed and presented at these meetings.
- After the initial public meeting(s), an overview of the proposed changes and public comments received is presented and reviewed at a City of Billings City Council work session meeting; during this work session meeting, public comment is also provided for and welcomed.
- A final approval of the proposed changes will be recommended for motion at a City of Billings City Council regular meeting with public comment on proposed changes provided for, welcomed, considered, and documented.
- For both council meetings (work session and regular), the City Council Meeting Agenda will be available on the City of Billings website 30 (thirty) days in advance; all City Council Meetings for any given month are advertised the month prior by the third week.
- A notice of the final changes will be posted via the various methods indicated above within 15 days of implementation.

In the event the City of Billings City Council approves a comprehensive fare policy which approves multiple phases or implementations of fare or service adjustments over a period of time, MET reserves the right to modify this public comment process.

4.2 - Budget and Tax Levy Changes

MET's annual budget and any associated tax levy changes will be reviewed at both a scheduled City of Billings City Council work session meeting and a regular public hearing meeting, both of which allow for public comment and consideration. Again, the City Council Meeting Agenda will be available on the City

of Billings website 30 (thirty) days in advance; all City Council Meetings for any given month are advertised the month prior by the third week.

5 - CUSTOMER PREFERENCES

5.1 - Customer Profiles

MET understands the importance of tailoring communications and public participation techniques to the preferences of intended audiences. For most aspects of service planning and communication about MET's services, the primary audience is MET customers. In order to understand these customers, MET is implementing bi-annual customer transit surveys with the initial round of surveys planned for Fall of 2019. This section will be updated with items such as ethnicity, household income, language preferences, other metrics upon survey completion and response analysis.

5.2 - Customer Communication Preferences

Through the course of the aforementioned survey, MET will also collect information regarding preferred communication styles. Again, this section will be update with specific metrics upon survey completion and analysis of responses.

6 - DIRECT COMMUNICATION METHODS

The Public Participation Plan identifies a menu of available methods for providing information to MET customers and the general public. While these communication methods are broadcast widely, they are also important tools in reaching minority and LEP populations; based upon the results of the bi-annual public surveys, MET Transit will update the items below as needed. Current methods of communication include:

- ***MET Transit's Website*** – MET's website, www.mettransit.com, is one of the primary sources of information for MET riders and the public seeking information about the MET. Several tools are available within the site to communicate changes in service as well as to notify the public of opportunities to participate in MET's decision-making process. These include a calendar of events, a banner "slideshow" with important information, and a News and Announcements feed that displays short summaries (with links to full announcements); all of these items are present on the home page. The home page also includes links to all aspects of available MET Transit information regarding schedules, maps, bus tracking applications, paratransit information, and other items.
- ***Signs, On-board Posters and Hang Cards*** – Signs and posters are printed materials posted in the notification areas of the buses, as well as at transfer centers and shelters, communicating applicable information. Hang cards are small signs with round cutouts (shaped like "Do Not Disturb" door hangers at hotels) that hang from horizontal grab bars/stanchions on the buses. These cards are printed on both sides, with English on one side and Spanish on the other; the size can be increased or decreased as needed to share additional information. They are a highly visible and effective means of communicating directly with MET riders.
- ***Electronic Messages to MET Email and SMS Subscribers*** – Electronic communications are sent out via the City of Billings' mass email and SMS subscription service (NotifyME via the CivicPlus platform). Customers can sign up on MET's website to receive emails and SMS messages from MET for items shared in the MET website News and Announcements section.

- **Emails to Partners** – These electronic communications are sent out directly from staff members’ email accounts; these can include messages to key staff members at partner locations, as well as additional posters or other materials for them to distribute.
- **Press Releases** – Press releases are aimed at generating news coverage of MET events, changes, public meetings, etc. They are distributed to the Department of Aviation and Transit’s media contact list, as well as posted in the News and Announcements section of MET’s website.
- **Community Newsletters** – MET has several partners in the community that publish newsletters, including several member governments. MET provides articles to these partners for publication in these newsletters.
- **Ads on Buses** – MET can request its advertising concessionaire create signage for display on the side of MET buses to advertise items as needed.
- **Partners’ Websites** – Like community newsletters, MET’s community partners maintain websites that are frequented by the public. MET can provide information to these partners and request to be included on their websites.
- **Community Calendars** – One feature that is common to many of MET’s partners’ websites is a calendar. MET can share the times and dates of key meetings or events with the partners for inclusion on these calendars.
- **Paid Ads in Local Media** – MET can publish paid advertisements in the local newspaper, The Billings Gazette, as well as in community newsletters and on local broadcast channels.
- **Public Notices** – These are published in the weekly newspaper of record, The Yellowstone County News, and are also posted on MET’s website.
- **MET’s Facebook page** – MET’s Facebook page is used by staff to interact with riders and can be leveraged to push out information regarding service changes and opportunities for the public to participate in MET’s decision- making process. Items which are posted on the MET website under News and Announcements are also posted to the Facebook page.

**All communication methods are available for translation or interpretation upon request.

7 - METHODS OF INVOLVING THE PUBLIC

MET employs a number of methods for involving the public in the decision-making process. Staff considers a number of factors when designing a public outreach process, such as the magnitude of the proposed change or decision, what level of influence public opinion has over the decision, and who will be impacted by the decision. MET also takes into account the specific preferences of minority and LEP populations and updates preferences as possible based upon bi-annual surveys.

7.1 - MET’s public involvement methods include:

- **Public Meetings** – A public meeting is a discussion between interested parties, often including riders and the general public. It is a meeting where information is presented and allows for an open discussion with a member of the MET staff; staff ensures comments stay focused on the information presented and that everyone has a chance to ask questions. A public meeting is NOT required by federal regulations and comments do not go into the public record; however, MET Transit does take note of discussion topics and comments for consideration in the planning process.
- **Public Hearings** - A public hearing is required by federal or state regulations where comments from the public go into the public record. A public hearing is governed by rules concerning who speaks when and for how long and is overseen by a City official. A public hearing is NOT a

question-and-answer format; public hearings generally occur during a scheduled City of Billings City Council Meeting.

- **Community Event Participation** – MET will staff informational tables at community events to share information about changes to service, new initiatives, community resources, and to provide further connection with the general public. These events allow MET to interact with a wide variety of community members.
- **Surveys** – Surveys are a series of specific questions, often in multiple-choice format that can be distributed in print form as well as in digital form. The results from surveys can be quantified and analyzed for consideration.
- **Aviation and Transit Board Meetings** - The Aviation and Transit Board meets the first Tuesday of each month at 5:30 p.m. at Billings Logan International Airport, 1901 Terminal Circle, Room 217, Billings, MT. These meetings are open to the public and include an opportunity for the public to comment on any item relating to aviation and transit. The Board meets monthly and meetings are open to the public. Meeting dates are advertised two weeks in advance on MET Transit’s website and in *Yellowstone County News*. The Aviation and Transit Board is composed of seven (7) members, each serving four year terms; members apply for the position and are appointed by the Mayor with confirmation given by the City Council. They are advisory only in nature. City of Billings Boards and Commissions encourage private citizens 18 years or older that reside in the City limits of Billings to participate in City government. They also offer an opportunity to learn how the City operates on a first-hand basis. When vacancies on the board occur, the opportunity to apply is advertised in the local paper and on the City of Billings website; further advertising is posted, in both English and Spanish, on the MET Transit website and social media, at transit facilities, and on-board transit vehicles.
- **Public Comment Cards** – Public comment cards are open-ended questionnaires that are distributed in printed form and are available on all MET Transit buses. These cards are valuable for open-ended discussions, although they are not as easy to quantify or analyze.
- **General Comments** – MET is always open to and accepting of public comments, regardless of whether they were given randomly or as part of an organized effort. Comments can be shared with MET by phone at 406-657-8218, by email at mettransit@billingsmt.gov, in person at 1705 Monad Road, Billings, MT, 59101, or by mail at the same address.

7.2 - Selection of meeting times and locations

The selection of meeting times and locations that are convenient for target audiences is crucial to providing meaningful opportunities for public participation. Announcements about meetings on service changes or fare changes are shared with the public via the means indicated above. Meetings are held at multiple times throughout the day (including mid morning, mid-day, early evening and late evening). Meetings are held at multiple locations throughout the City to ensure easy travel access for individuals in effected areas; common locations include community centers, the Billings Public Library, and MET Transit facilities.

Historically, attendance at public meetings typically averages roughly 5 - 8 members of the public, while community events resulted in 15+ interactions per event. MET has found that having technical staff available for outreach can allow for more detailed conversations with customers and members of the public.

8 - PUBLIC OUTREACH SUMMARIES

MET keeps historical record of public feedback received via meetings, comment, cards and emails for reference as needed. Further, public meeting summaries are posted for review on the MET Transit website in News and Announcements.

Public Outreach Activities undertaken in the last 3 years include:

Spring of 2016 – three (3) general public meetings, one (1) council work session meeting, and one (1) regular council meeting all regarding significant routing and fare changes effective July 1, 2016.

9 – LIMITED ENGLISH PROFICIENCY (LEP) SUPPORT, TRANSLATION, AND INTERPRETIVE SERVICES

MET’s program for providing translation and interpretive services is critical to the success of the Public Participation Plan in reaching minority and LEP populations. The program provides translation and interpretive services upon request at the customer service window, over the phone, at all public meetings, and for important documents.

MET currently utilizes Language Link to provide verbal interpretation services to customers upon request. These services can be accessed by phone or at the customer service window at the MET Transit METroplex. Further, MET also partners with the local Migrant Council for Spanish interpretation in person or of passenger documents, if needed. MET will also utilize Google Translate as necessary should an interpreter not be available. The availability of translation services are publicized in meeting notices.

MET also provides Spanish translated copies of documents vital to accessing the transit service including the MET Routes and Schedules book, the Request for Certification of ADA Paratransit Eligibility form, the Title VI Complaint Form, the Title VI Notice, the ADA Complaint Form, and the Passenger Conduct Policy.

Further, public outreach notices are made available in Spanish via on-board posters, the MET website, and social media postings; MET also sends meeting notifications to the Migrant Council for dissemination to the LEP population that agency serves.

More details about MET’s strategy and resources to ensure that language is not a barrier for people to take full advantage of MET’s services can be found in MET’s Title VI plan.

10 - MET PARTNERS

MET utilizes a network of local partners to enhance its reach within the community. MET can increase exposure of its messages by routing them through partners’ communication networks, thereby reaching more of the minority and LEP populations. These messages include:

- Information about MET’s services
- Opportunities to participate in MET’s decision-making process

Further, this network allows MET to consult with partners’ staff and clients on:

- Transportation needs
- Solutions to potential or real issues

11 - EQUITY CONSIDERATIONS

MET recognizes that, on a national scale, minority and low-income populations have historically been systematically excluded from participating in public decision-making. Due to persistent societal and cultural influences, it can be difficult to ensure diverse public participation in MET's decision-making, despite the concerted efforts described in this plan. MET therefore recognizes the need to carefully consider how to design inclusive outreach processes, and to build in key steps to consider whether a public participation process and its outcomes are achieving the intended results.

MET staff will utilize the following considerations to evaluate the racial equity implications of key decisions:

- Have ethnic communities/people of color represented within the area population been informed, involved and represented in the process?
- How has the feedback been considered and incorporated?
- What challenges has MET faced in receiving minority and low income population participation?
- Is there a group that benefits more than another because of this process/decision?
- What could be one unintended consequence of this process/decision for ethnic communities/communities of color?
- What action will be implemented to advance equity in this process/decision?

12 - OUTCOMES

The outcomes of public participation will be reported in an open and transparent manner. The expectation is that, once community members have participated in a process, MET owes it to them to say how their participation influenced the outcome. MET should be able to demonstrate that it explored the suggestions and recommendations of the public and taken that into consideration as part of the process. Meeting summaries, survey results, and other reports will be shared via the MET Transit website News and Announcements section as well as via methods indicated above.

13 - CONCLUSION

This Public Participation Plan is accountable to the public. The strategic approach, goals, and guiding principles MET has established are intended to foster public participation by providing early, continuous, and meaningful public engagement processes for its stakeholders regardless of race, color, or national origin, including populations and individuals who may be underserved because of Limited English Proficiency (LEP), minority or socioeconomic status, or disability. The methods and techniques employed by MET are intended to help increase public participation rates, particularly among those individuals and populations that are often overlooked or underrepresented. While the methods and techniques used during the public participation process may vary according to each circumstance, MET will make every effort to achieve the standards it has set within this plan. Further it will design public communication efforts with the goal of most effectively reaching out to the diverse populations throughout MET's service area. As a living document, this Plan may evolve according to the demographic makeup of MET's communities and their unique needs, as well as MET's evaluation of its public participation effectiveness.