



## Mixmaster Replacement

### The New Mix Plan for Public Involvement

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# 1 Introduction

## 1.1 PROGRAM OVERVIEW

The Connecticut Department of Transportation (CTDOT) is exploring design options for the future replacement of the Interstate 84-Route 8 interchange in Waterbury. The interchange, commonly referred to as the Mixmaster, consists of miles of highway, including bridges that are stacked and over other roadways, rail lines, and the Naugatuck River. The replacement of the Mixmaster has been identified as a priority project by CTDOT.

CTDOT is currently undertaking a rehabilitation project to improve the structural condition of the Mixmaster. While this work will prolong its lifespan for another 25 years, a long-term plan for the interchange and all of its structures will need to be developed. CTDOT is beginning the process of planning and reviewing designs for the future of the Mixmaster interchange through The New Mix program.

Planning for the future of the Mixmaster interchange is an incredibly complicated undertaking because of the numerous constraints and variables that must be considered. Due to the original design of the interchange, especially the stacked bridges, each replacement option must also allow for construction staging in a safe manner for motorists as overhead bridges are removed or replaced. Environmental regulations must be met, and the design should mesh appropriately with surrounding areas. Finally, traffic flow throughout the study area must be maintained during construction, construction impacts minimized in consideration of the densely populated Waterbury community and commuters alike.

## 1.2 PLANNING AND ENVIRONMENTAL LINKAGES (PEL) PROCESS

The National Environmental Policy Act (NEPA) requires that federal agencies evaluate the environmental impacts of their projects, including any transportation projects, before they are formally implemented. The NEPA review typically begins when the early conceptual design process begins and includes the review of a range of alternatives.

Developed by the Federal Highway Administration (FHWA), the PEL process considers and incorporates environmental, community, and economic goals in the very early planning phases of transportation projects. When PEL is used, it occurs concurrently with the early conceptual design process and NEPA occurs after PEL is complete.

When transportation projects are approached in this collaborative, multi-disciplined manner in the early planning phases, potential issues are more likely to be discovered early on and before the NEPA review. Through the PEL process, these issues may be able to be resolved. Information and analyses obtained through the PEL process can be carried forward into NEPA review.

The number of design options that then get reviewed during the NEPA process are both narrowed and more thoroughly vetted, and less likely to need to be revisited later because of NEPA requirements, saving both time and money.



Additionally, by including community and the economic development goals in the early planning phases of a given transportation project, PEL provides the opportunity for transportation projects to be designed in context with their environment and aligned with both community and economic development goals.

CTDOT intends to utilize the PEL approach for planning and advancing design concepts that will create a master plan/vision for the New Mix. Stakeholder groups, a Project Advisory Committee, and the general public will provide input on specific design and planning aspects of the project. Input and comments from all groups will be documented.

### 1.3 PURPOSE OF THE PLAN FOR PUBLIC INVOLVEMENT

Integral to the planning, design, and eventual construction of the New Mix is public involvement. CTDOT will be undertaking a public involvement campaign designed to engage specific stakeholder groups and the general public. This plan also outlines how federal, state, and local agencies, as well as Native American Tribes, should be included in the PEL process in an effort to address potential design, environmental, or other issues early on and create a path for an efficient NEPA review.

Gaining full public agreement, or consensus, on each design element of the New Mix may not be possible. For this reason, CTDOT wishes to gain public input throughout the study process to better inform program decisions.

In that spirit, this public involvement campaign is designed to keep individuals informed about the design options, the program's progress and timeline, as well as provide various opportunities for public input and feedback.

This plan lays out the public involvement objectives and methods through which CTDOT will engage, communicate with, and solicit feedback from the general public and various stakeholder groups throughout the process of identifying a design for the New Mix.

This Plan for Public Involvement will cover the PEL phase, estimated to be approximately 24 months. This plan will also serve as the basis for future New Mix Plans for Public Involvement.

## 2 Public Involvement Objectives

CTDOT's New Mix program team has identified the following objectives for its public involvement campaign:

- Set clear expectations about the program, planning and design process, regulatory requirements, and the role of public input.
- Be open, transparent, and provide clear and concise information about all aspects of the project.
- Conduct broad and inclusive outreach during the design process and throughout the program.
- Be inclusive beyond Federal Title VI and Environmental Justice requirements.
- Establish and maintain partnerships with the public and stakeholders.



- Understand and address potential issues as raised by federal, state, and local agencies, including regulatory agencies, and Native American Tribes.
- Listen and learn about the perspectives, concerns, and suggestions from the point of view of various users, stakeholder groups, and general public.
- Ensure that public participation methods, means and opportunities are clearly defined, accessible and communicated regularly.
- Utilize a variety of communication methods to engage and reach diverse regional constituencies.
- Respond in a timely and effective manner to all comments and concerns received.
- Build excitement around the ability to shape the future.

## 3 Inclusive Outreach

As a potential recipient of federal funding, CTDOT is required to follow federal laws and guidance related to Title VI, Environmental Justice, and Limited English Proficiency. The New Mix program team will meet these federal requirements, outlined below. Investigation and Selection of Contracting Methods

### 3.1 INCLUSION

The project team believes that being inclusive beyond federal requirements will lead to a more informed design selection process for the New Mix. The New Mix program team will be inclusive in its public outreach and work to surpass federal requirements in order to engage and involve residents of all abilities, genders, ages, income levels, and ethnicities.

### 3.2 TITLE VI

The New Mix program team will comply with the provisions of Title VI of the Civil Rights Act of 1964 (42 U.S.C. Section 2000d). Title VI of The Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in projects and activities receiving Federal financial assistance.

### 3.3 ENVIRONMENTAL JUSTICE

Minority and low-income communities sometimes face disproportionately high rates of negative health impacts due to environmental pollution. These communities also tend to be underrepresented in the public outreach process for projects. In 1994, an Executive Order directed federal agencies to implement Environmental Justice (EJ) strategies to address this discrepancy.

The purpose of EJ is to ensure that all” federally funded transportation-related programs, policies, or activities having the potential to adversely affect human health, or the environment involve a planning and programming process that explicitly considers the effects on minority populations and low-income populations.” EJ communities include:

- Minority communities
- Low-income communities

### 3.4 LIMITED ENGLISH PROFICIENCY

The Federal Highway Administration (FHWA) defines Limited English Proficient (LEP) people as those individuals who speak English less than very well, may speak English as a second language, and who have limited abilities to read, speak, write, and/or understand English.

The New Mix program team will identify (utilizing census data), include, and engage Title VI, Environmental Justice, and LEP populations in the study area by:





- Offering to translate communications materials in appropriate languages and to provide translation as needed at public meetings.
- Publishing legal notices in multi-language publications.
- Conducting grassroots outreach by establishing partnerships in low-income neighborhoods including community organizations, neighborhood groups, and neighborhood businesses.
- Attending neighborhood events and fairs with informational materials.
- Ensuring that Title VI, EJ, and LEP stakeholders are represented in program meetings, the Project Advisory Committee, and other venues that provide the opportunity for public comment.
- An LEP Analysis Document has been produced by the New Mix program team that identifies the languages which documents should be translated into. This LEP Analysis Document is included in Appendix A to this Plan for Public Involvement.

**Deliverables:**

- Maps identifying Title VI and EJ communities in study area
- An LEP Analysis Document that will determine which languages the program team should translate documents
- Translation of program documents as necessary and outlined by LEP Analysis
- List of community organizations that serve Title VI, EJ, and LEP populations for outreach
- Broad and grassroots that includes local businesses, social clubs, festivals, and events

## 4 Organization of Public Outreach

Public involvement will be structured so as to include feedback from large stakeholder groups as defined below and the general public. Stakeholder groups will serve as the pool from which to draw membership for a formal Project Advisory Committee (PAC) for the program. The purpose of the PAC will be to provide technical and practical feedback that may allow the early resolution of issues during the PEL study, setting the stage for a smooth and well-coordinated path to NEPA.

### 4.1 STAKEHOLDER GROUPS

Stakeholder group meetings are not public meetings but are opportunities for the program team to meet with affinity groups for the purposes of learning about each groups' perspective and macro-level concerns about design and construction. Stakeholder groups include:

- Community Organizations, Environmental Justice, and Title VI-Related Groups
- Elected and Government officials
- Immediate abutters (neighborhoods and businesses)
- Large Employers

- Environmental
- Historical
- Transportation, Trucking, and Commuter groups

**Deliverables:**

- Lists of environmental, historical, and commuter groups for outreach and for possible stakeholder group formation.
- Initial contact list for each stakeholder group.
- Outreach letters and/or emails for each stakeholder group.

## 4.2 PROJECT ADVISORY COMMITTEE (PAC)

The Project Advisory Committee (PAC) will be formed to provide feedback on the program’s purpose and need, draft goals and objectives, and design concepts. Two-way communication between the PAC and program team will begin early in the planning process and continue throughout concept refinement and the selection of a Range of Reasonable Alternatives. In the early planning phases of the New Mix program, feedback from PAC members may inform the selection of a Range of Reasonable Alternatives for the New Mix. In later phases of the New Mix program, feedback from PAC members may shape plans for construction staging, maintenance of traffic during construction, and program mitigation measures. PAC membership is anticipated to represent a cross section of interests including groups that will be directly impacted by the program. The PAC will be assembled to allow for constructive dialogue from various perspectives including those who live near the study area, highway users and commuters, local government officials, and large employers. PAC membership is intended to include individuals of diverse ethnicities, genders, abilities, income levels, ages, and LEP status.

The PAC will consist of representation from each stakeholder group listed above. Each individual PAC meeting will be held prior to any corresponding public meetings covering the same subject matter. This will provide the New Mix team an opportunity to consider, address, and incorporate PAC members’ questions and refine the presentation of concepts prior to meeting with the public.

**Deliverables:**

- Develop a schedule of PAC meetings/identify how frequently PAC meetings will occur.
- Draft list of potential PAC members.
- Outreach to approved PAC members.

## 4.3 PUBLIC MEETINGS

Public meetings are one of many ways the New Mix Program team will engage and inform the public about the program, as well as secure public opinion about various aspects of the program. Public meetings will be held on an ongoing basis throughout planning, design, and construction of the New Mix. Public meetings will be held at Americans with Disabilities Act (ADA) accessible buildings.



Initial public meetings may be held virtually due to the pandemic. When it is safe to do so, and when people feel comfortable doing so, in-person meetings and hybrid meetings are also planned to occur.

For in-person meetings, care will be taken to secure meeting locations that are served by public transit and are familiar to the community. Meetings will be held at various locations and on various days and times within the study area in order to be convenient to multiple stakeholders. Interpretation, translation, and other assistance will be provided upon request at all public meetings.

Public meetings, whether virtual, in-person, or hybrid may be advertised in the local media, through program email blasts, the program website, websites of community organizations and local government, and social media. Hard copy meeting notices will be distributed throughout the community.

**Deliverables:**

- Up to six public meetings for this phase of the program
- Public meeting notices and advertisements
- Suggestions for appropriate meeting locations
- Comment forms
- Program email signup sheets

## 5 Agency Coordination: Regulatory & Coordinating Agencies

Permitting and regulatory approvals are not part of the PEL process. However, regulatory and coordinating agencies will be included in the PEL process in an effort to identify and address potential issues early on, creating a path for an efficient NEPA review later.

Agency coordination can occur efficiently through the PAC; however, it is assumed that there will be separate meetings further into the study with environmental agencies and Native American Tribes, through FHWA, as applicable.

The following regulatory and coordinating agencies may be considered for inclusion:

**Anticipated Funding Partner:**

- FHWA (lead federal agency)

**Regulatory Agency Coordination (to occur separately and later in PEL Study):**

- U.S. Army Corps of Engineers (USACE)
- U.S. Environmental Protection Agency (EPA)
- Connecticut Department of Energy and Environmental Protection (DEEP)
- Connecticut State Historic Preservation Office (SHPO)

- Tribal Historic Preservation Office (THPO) – through FHWA

Economic Development Agencies anticipated to be met with separately:

- U.S. Department of Housing and Urban Development (HUD)
- Connecticut Department of Economic and Community Development (DECD)
- Connecticut Office of Policy and Management (OPM)

## 6 Branding & Messaging

The program team will establish a brand identity and messaging for the New Mix Program that is clear about the draft purpose and need of the program as well as the opportunities and benefits for the Waterbury community.

### 6.1 PROGRAM NAMING AND ARCHITECTURE

A name and logo for the New Mix will be developed, along with guidelines for logo usage. This will be important to help stakeholders and the public differentiate the program from other ongoing initiatives in the study area.

#### **Deliverables:**

- Final Program Name and Logo

### 6.2 STYLE GUIDE

A style guide will be developed to provide direction for visual use of the new program logo, including color and size guidance. This will assist in uniform branding among the many different team members who may use the logo.

#### **Deliverables:**

- Final design guideline document

### 6.3 MESSAGING

Multiple message directions will be explored, all in alignment with the program and public involvement objectives. The program team will review the overall public involvement messaging directions with CTDOT and refine based on their feedback. CTDOT will select and approve the overarching message direction for this program. Based on CTDOT direction, approved message direction to be validated with members from key stakeholder audiences.

#### **Deliverables:**

- Message direction concepts
- Final messaging platform document



## 7 Communication Methods

CTDOT’s public outreach campaign will include several different communication strategies, reaching people where they get their information, whether it be news, social media, through direct outreach, the program website, email blasts, collaboration with community associations, and more. The program team will maximize the campaign’s impact by partnering with existing community organizations and municipalities, utilizing their communication infrastructures, engaging their constituencies, and sharing information about the New Mix Program.

Additional outreach strategies may include direct outreach to various stakeholder groups, presentations, meetings, interviews, focus groups, social media, and a paid advertising component. CTDOT will utilize many different outreach strategies to reach as broad a range of residents and commuters.

### 7.1 STAKEHOLDER GROUP MEETINGS

Meetings with stakeholder groups will begin early in the PEL process for the purposes of establishing trust and transparency. During these meetings the program team will introduce the program and program approach, as well as obtain information from each stakeholder group that may be helpful in informing program concept options and considerations.

This approach supports the program by creating an informal infrastructure (each of these groups have a large constituency) that can be beneficial for information sharing as the program advances.

#### **Deliverables:**

- Scheduling and logistics for stakeholder group meetings
- Invitations and meeting notices for stakeholder group meetings
- Agendas for stakeholder group meetings
- Presentations and informational materials for stakeholder group meetings
- Documentation of stakeholder meetings and of input received at meetings

### 7.2 INTERVIEWS & FOCUS GROUPS

Interviews and focus groups are meant to elicit insightful information about the public’s experiences, perceptions, and opinions regarding the current condition of the study area and the upcoming program. Interviews and/or focus groups may be utilized when appropriate and with the agreement of CTDOT.

While not statistical in nature or data driven, the information obtained from the focus groups will be of use to the program team in understanding the experiences and opinions of those working, living, and traveling within the study area.

#### **Deliverables:**

- List of demographic characteristics of potential focus group participants
- Focus Group plan



- List of potential interviewees
- Interview questions script
- Documentation of information gathered through interviews and focus groups

## 7.3 PROJECT ADVISORY COMMITTEE

The Project Advisory Committee (PAC) will be a formal group that will meet regularly during the PEL study. The New Mix program team will brief the PAC on PEL study progress at regular intervals, providing PAC members the opportunity to ask questions, and provide input. The more formal group setting will accommodate those stakeholders and community members who wish to be more involved in the New Mix program. All input—whether received from a PAC member, a member of the public, or at a stakeholder group meeting—will be weighed the same.

### **Deliverables:**

- Scheduling and logistics of PAC meetings
- Invitations/notice of PAC meetings for PAC members
- Agendas for PAC meetings
- Presentations and informational materials for PAC meetings
- Documentation of PAC meetings and input received by PAC members

## 7.4 PUBLIC MEETINGS

Public meetings will be held regularly throughout the PEL study, though slightly less frequently than PAC meetings. Public meetings will provide clear, concise information about the New Mix program's PEL study, providing an opportunity the general public to learn about the program, ask questions, and provide input.

### **Deliverables:**

- Scheduling and logistics of public meetings
- Public meeting notices and advertisements
- Meeting agendas
- Presentations and informational materials
- Documentation of public meetings and input received at public meetings
- Comment forms
- Program email signup sheets



## 7.5 INFORMATIONAL MATERIALS

All informational materials will be translated into languages identified through the program team’s LEP analysis of the study area.

### 7.5.1 Newsletters

The New Mix program team will prepare newsletters on an ongoing basis. Newsletters will be distributed through email blast, on the program’s website and social media, and in hardcopy for placement around the community. For the current phase of the program, quarterly newsletters will be developed.

#### **Deliverables:**

- Newsletter template
- List of hard copy distribution sites
- Four editions of the New Mix newsletter

### 7.5.2 Factsheets

The New Mix program team will develop a program overview factsheet for use on the program’s website and social media that will also be reproduced in hardcopy format for distribution. The overview factsheet will be updated as needed throughout the design and construction process. The program team will develop additional factsheets on specific aspects of the program as needed.

#### **Deliverables:**

- Up to two factsheets for this phase of the program

### 7.5.3 FAQs

The New Mix program team will develop a list of Frequently Asked Questions (FAQs) for use on the program website, social media, and hard copy informational materials. The FAQs will be updated as needed throughout the design and construction process.

#### **Deliverables:**

- Development of a list of FAQs and responses, updated consistently as the New Mix program progresses

### 7.5.4 Presentations

The New Mix program team will develop a program overview presentation which will be updated on an ongoing basis. The New Mix program team will develop additional presentations that delve deeper into certain aspects of the program as needed.

#### **Deliverables:**

- Development of base overview presentation

- Development of specialized presentations

### 7.5.5 Visualizations

Graphics and visualizations are powerful communication tools that enable the public to understand the technical aspects of the program. The New Mix program team will develop renderings, 3D graphics and other visualizations to illustrate design options, site restrictions, construction staging, design aesthetics, and possible construction impacts in a clear, easily understandable manner.

#### **Deliverables:**

- Development of up to 15 visualizations to illustrate design options and other program elements for use on the program website, in presentations, and on display boards.

### 7.6 WEBSITE

A program website will be developed to serve as the central source for program information. The New Mix program team will develop and host a user-friendly public website for the program. The branded website will include maps and photos of the study area, program description, content such as fact sheets, FAQs, video(s), concepts, renderings, and links to related websites. The website will follow the design guidelines set by the program's branding. The website will interact with the Public Involvement Management Application (PIMA) platform and visitors will be able to submit comments on the program.

#### **Deliverables:**

- Development of website structure for a 3-5-page website (site map, wireframes)
- Development of visual layout and draft content for website
- Ongoing website performance reporting and technical updates

### 7.7 SOCIAL MEDIA

Social media will complement other communication methods, used to engage people for the first time, drive traffic to the New Mix website, highlight program progress, share interesting program related information and more. Social media profiles will be established for the program. Social media channels will include Facebook and Twitter and will direct users to specific locations/links on the program website. The social media profiles will be developed, structured, and maintained to enhance public access to program information.

#### **Deliverables:**

- Development and maintenance of social media platforms
- Monthly social media content calendars
- Ongoing social media performance evaluation





## 7.8 MEDIA RELATIONS (EARNED MEDIA)

The New Mix program team will establish a media relations program in order to secure earned media for the purposes of keeping the general public informed about positive aspects of the program, program need, progress, and opportunities for public input. Earned media is news coverage, as it is “earned” and not paid advertising. News coverage of the New Mix program will be closely monitored to gauge the effectiveness of the public involvement program messages and to provide insight into the public sentiment of the program.

### **Deliverables:**

- Develop and maintain media contact database
- Develop a media calendar that identifies opportunities for positive media coverage at certain milestones, announcements, and notification of meetings/hearings
- Catalog all New Mix related news stories

## 7.9 PAID ADVERTISING

Paid advertising may be used to raise awareness of the program and promote participation and attendance around public outreach meetings. The New Mix program team will develop a media buy plan that will include recommendations for an optimized mix of media vehicles and rationale (digital media, print media, social media).

### **Deliverables:**

- Media plan for public meeting promotion
- Creative elements to be used in media for meeting promotion

## 8 Public Involvement Management Application (PIMA) & Documentation

The New Mix program team will utilize PIMA to track, evaluate, and document the New Mix public involvement campaign. PIMA is a cloud-based tool tied directly to the program website and will allow for ease in public registration, GIS pinpointing, comment documentation, and public involvement analytic monitoring.

### 8.1 CUSTOMIZATION & TRAINING

The New Mix program team will identify the features needed to customize PIMA for the New Mix.

### **Deliverables:**

- PIMA presentation to CTDOT
- Customization of PIMA for the New Mix program

- PIMA training for CTDOT

## 8.2 STAKEHOLDER DATABASE

A stakeholder database will be established through PIMA. Stakeholder names, preferred method of contact, contact information, and other information will be stored in this database.

### **Deliverables:**

- Enter existing stakeholders into PIMA database
- Enter new stakeholders on an ongoing basis

## 8.3 COMMENT & INQUIRY DATABASE

A comment and inquiry database will be established through PIMA to track stakeholder questions and requests for information and to ensure and document timely responses. The database will also provide the program team with valuable information about major areas of stakeholder concern.

### **Deliverables:**

- Development of an inquiry response process that includes review protocols and a timeframe for responses.

## 8.4 CRITICAL MILESTONES DOCUMENTATION

Reports, updates, and summaries will be developed in PIMA for regular stakeholder updates and will provide documentation critical PIMA and program milestones through the PEL process.

### **Deliverables:**

- Enter public comment themes into the PIMA database
- Enter stakeholder comment themes/concerns in the PIMA database
- Upload all reports and updates into the PIMA database

# 9 Logistics

## 9.1 EQUIPMENT/AUDIO-VISUAL

Public involvement engagement meetings will require audio and visual equipment beyond a projector, screen, microphones, and single laptop. The program team will conduct an equipment assessment to determine the need for additional items such as laptops, tablets, and other equipment to visually communicate program progress and solicit feedback. As new technology is developed, the program team will assess the efficacy and efficiency of new items that may improve the public involvement process.

### **Deliverables:**



- List of equipment needed for the New Mix public outreach effort, including cost and recommendations for renting as needed or buying

## 9.2 DOCUMENTATION

All public comments will be documented and recorded in the PIMA database tool. All public involvement meetings will be documented. Formal meeting minutes will be prepared summarizing meeting date, location, attendees, general meeting discussion and comments from the public along with any responses communicated by the program team.

### **Deliverables:**

- Documentation of all public and stakeholder meetings, uploaded to PIMA
- Upload of all public comments into PIMA

## 9.3 TRANSLATION AND INTERPRETATION

Upon request, translation and interpretation services will be provided at no cost to the public for all New Mix program meetings. The program team will develop a list of translators who are bilingual in English and the languages determined by the initial LEP analysis. The program team will conduct additional LEP analyses periodically over the course of the program to ensure the use of current data.

All public information documents will be translated into other languages as determined by the LEP analysis.

All public notices, press releases, and New Mix public information documents will note that language assistance can be requested by contacting CTDOT's Office of Communications in advance of a meeting and logistics will be coordinated with the program team. These notices will also provide simple instructions for the hearing impaired on how to utilize the 711 Telecommunications Relay Service in order to request accommodations. Language and sign language interpretation will be discussed with the program team prior to each public meeting in combination with requests made by the public.

Translation and transcription needs will be assessed regularly during the public involvement process to ensure the program team is responsive to LEP and hearing-impaired individuals and is engaging them effectively

### **Deliverables:**

- A list of American sign language interpreters available to work in the study area
- A list of bilingual translators (exact languages as determined by the LEP analysis) who are able to provide translation assistance at meetings
- A list of services providers for translation of written documents

## 10 Evaluation & Analytics

The program team will monitor the effectiveness of communication efforts and measure the impact of public engagement in a variety of ways. Campaign goals will be established against which the team can analyze performance against stated goals.

### 10.1 ASSIGN KEY PERFORMANCE INDICATORS (KPIs) TO ALL OBJECTIVES

Develop primary and secondary KPIs for public involvement objectives to successfully measure ongoing performance.

**Deliverables:**

- Measurement Plan Document

### 10.2 PUBLIC OUTREACH MEETING ANALYSIS

Reporting up public meeting attendance, engagement, feedback, and media coverage.

**Deliverables:**

- Summary reports on public outreach meeting(s)

### 10.3 WEBSITE ANALYSIS BASED ON ON-SITE CONTENT OBJECTIVES

Ongoing monitoring of the number of interactions indicating engagement.

**Deliverables:**

- Monthly metrics summary reports for website

### 10.4 PUBLIC RELATIONS AND SOCIAL MEDIA ANALYSIS

Ongoing analysis of the level of engagement on the New Mix program website and social media. Such monitoring will allow the program team to identify opportunities for adjustments or optimizations.

**Deliverables:**

- Monthly summary reports on social media engagement and activity



## Appendix A – Limited English Proficiency Analysis



### Limited English Proficiency Analysis

The US DOT “Policy Guidance Concerning Recipients’ Responsibilities to LEP Persons” discusses the concept of “safe harbor” with respect to the requirements for translation of written materials.

The Safe Harbor Threshold is calculated by dividing the population estimate for a language group that “Speaks English less than very well” by the total population of the county. The LEP Safe Harbor Threshold provision stipulates that for each LEP group that meets the LEP language threshold (5% or 1,000 individuals, whichever is less, of the population to be served) the subrecipient must provide translation of vital documents (e.g., Notice of Nondiscrimination, Complaint Procedure and Complaint Form) in written format for non-English speaking persons.

If there are fewer than 50 persons in a language group that reaches the 5% trigger, the recipient does not translate vital written materials but provides written notice in the primary language of the LEP language group of the right to receive competent oral interpretation of those written materials, free of cost.

The US Census Bureau compiles 2015 American Community Survey (ACS) data for language groups at the state level for the following language groups:

- Spanish or Spanish Creole
- French (incl. Patois, Cajun)
- French Creole
- Italian
- Hmong
- German
- Yiddish
- Other West Germanic languages
- Scandinavian languages
- Greek
- Russian
- Polish
- Serbo-Croatian
- Other Slavic languages
- Armenian
- Persian
- Gujarati
- Hindi
  - Urdu
- Other Indic languages
- Other Indo-European languages
- Chinese
- Japanese
- Korean
- Mon-Khmer, Cambodian
- Portuguese or Portuguese Creole
- Thai
- Laotian
- Vietnamese
- Other Asian languages
- Tagalog
- Other Pacific Island languages
- Navajo
- Other Native North American languages
- Hungarian
- Arabic
- Hebrew
- African languages
- Other and unspecified languages

The New Mix study area has Census Tracts that meet the “safe harbor” threshold for “Spanish or Spanish Creole”, “Portuguese or Portuguese Creole”, and “Other Indo-European languages” as shown in Figure 1 and described in Table 1 below.

The Other Indo-European languages category include Albanian-, Lithuanian-, Pashto- (Pushto), Romanian-, and Swedish-language speakers.

Additional research and targeted outreach led to the identification of Albanian as a type of “Other Indo-European Languages” spoken, as well as other languages spoken by populations in Waterbury. Albanian and Arabic are the top-two, non-English languages spoken by Waterbury Public School students. Additionally, Waterbury is home to Haitian populations that speak French/French Creole languages.

Key informational materials such as factsheets, meeting notices, presentations, and email blasts will be distributed in English, Spanish, and Portuguese. These materials will also include a statement that offers



translation of said documents into Albanian, Arabic, and Haitian/French Creole; the statement will be provided in all three languages.

The program's webpage will be presented in English, Spanish, Portuguese, Albanian, Arabic, French Creole, and numerous other languages via the latest version of Google Translate.

To promote transparency and accessibility, the program webpage, meeting announcements, and communications with the public about the program will include instructions for requesting additional accommodations and language access services.

In addition, a Title VI Notice of Nondiscrimination Rights and Protections to Beneficiaries will be posted at all public meetings/hearings, included in any notification of such meetings, and be posted on the program website. This notice is intended to inform people of their rights and to provide instructions for filing complaints.

Accommodations are available for persons with limited English-speaking ability for all public engagement activities. Given the communities in which the meetings are taking place, Spanish and Portuguese interpretation will be made available at all in-person meetings.

For any virtual meetings, the program team will utilize the various accessibility features of virtual meeting platforms, such as real-time captioning and multilingual audio feeds in Spanish and Portuguese. Auxiliary aids or the services of American Sign Language interpreters and translation services for languages other than Spanish and Portuguese will be made available upon request for both virtual and in-person meetings

Figure 1

Limited English Proficiency Census Tracts in Waterbury, CT

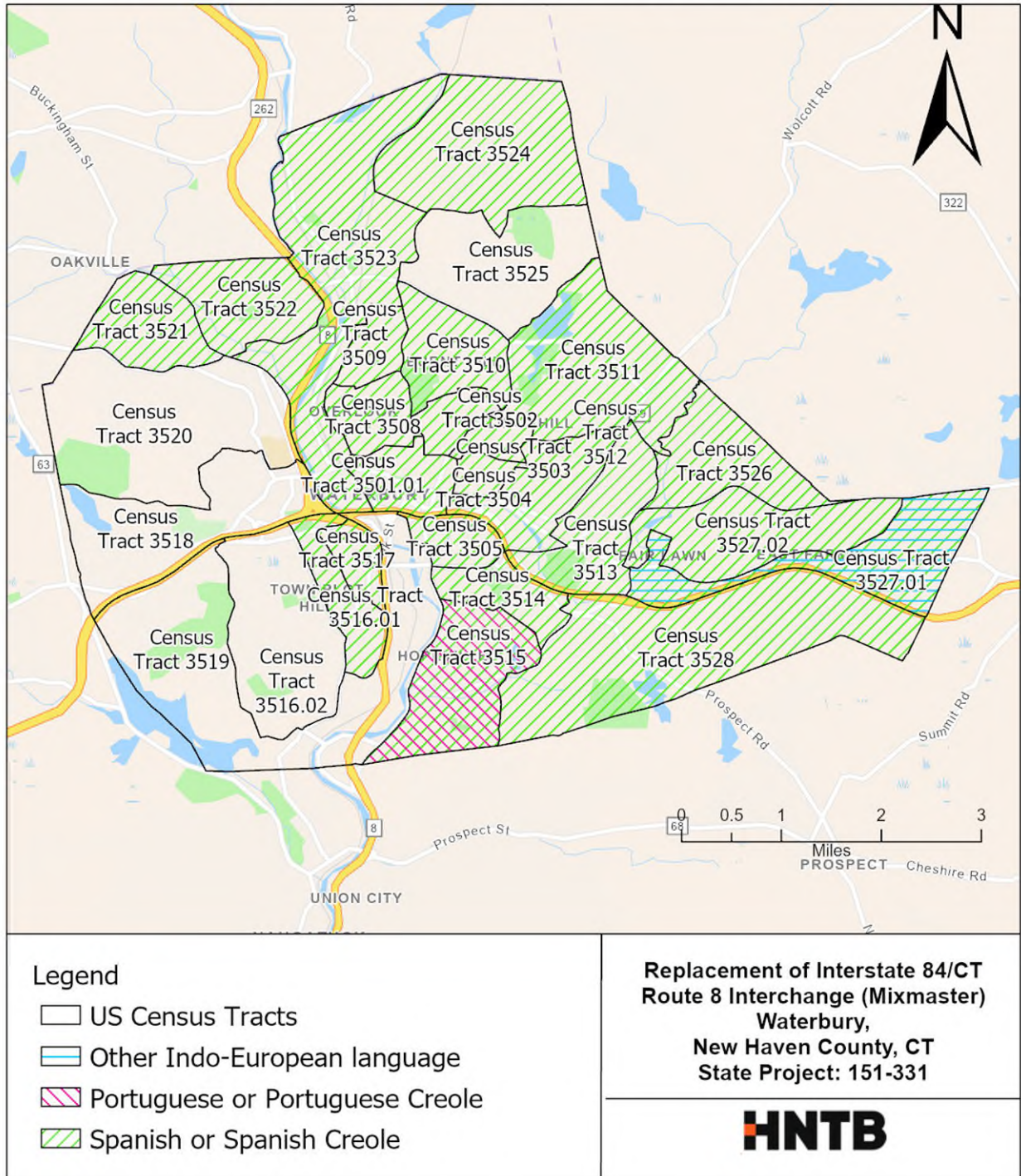






Table 1 Languages Meeting the "Safe Harbor" Threshold

Census Geography	Spanish or Spanish Creole:		Portuguese or Portuguese Creole:		Other Indo-European languages:		Total population 5 years and older:
	#	%	#	%	#	%	
CT 3501	813	24.0	-	0.0	-	0.0	3,382
CT 3502	661	20.8	-	0.0	-	0.0	3,175
CT 3503	364	22.0	-	0.0	-	0.0	1,655
CT 3504	370	15.2	17	0.7	-	0.0	2,435
CT 3505	579	23.5	59	2.4	14	0.6	2,462
CT 3508	741	15.1	22	0.4	6	0.1	4,915
CT 3509	114	6.4	20	1.1	-	0.0	1,794
CT 3510	289	7.0	11	0.3	25	0.6	4,127
CT 3511	284	7.5	-	0.0	82	2.2	3,782
CT 3512	621	15.5	48	1.2	-	0.0	4,001
CT 3513	425	7.7	-	0.0	73	1.3	5,532
CT 3514	830	22.4	81	2.2	25	0.7	3,710
CT 3515	369	7.7	217	4.6	-	0.0	4,765
CT 3516.01	158	5.1	24	0.8	18	0.6	3,103
CT 3517	166	6.9	-	0.0	-	0.0	2,408
CT 3521	234	6.4	32	0.9	26	0.7	3,648
CT 3522	204	8.5	-	0.0	7	0.3	2,394
CT 3523	445	14.4	11	0.4	-	0.0	3,091
CT 3524	205	7.1	21	0.7	-	0.0	2,896
CT 3526	267	5.2	-	0.0	202	3.9	5,122
CT 3527.01	130	5.1	-	0.0	176	6.9	2,559
CT 3527.02	376	6.7	79	1.4	-	0.0	5,628
CT 3528	817	12.4	19	0.3	63	1.0	6,570

Source: US Census Bureau. Table B16001 - AGE BY LANGUAGE SPOKEN AT HOME BY ABILITY TO SPEAK ENGLISH FOR THE POPULATION 5 YEARS AND OVER (2015 ACS 5-year estimates).