

## TECHNICAL MEMORANDUM

**DATE:** October 7, 2021  
**TO:** Paul Reilly, OPRD  
**FROM:** Ryan Farncomb  
**SUBJECT:** Final Memo 1: OCT Action Plan Engagement Strategy  
**CC:** Cole Grisham, FHWA Western Federal Lands  
**PROJECT NAME:** Oregon Coast Trail Action Plan

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### INTRODUCTION

This memorandum describes the public and stakeholder engagement strategy that will be carried out in support of the Oregon Coast Trail (OCT) Action Plan (Action Plan). We identify the goals for public engagement, key stakeholders, applicable state and federal regulations related to public engagement, and tactics. This memo is a living document that lays out a proposed plan for engagement, but we recognize that the approach to engagement will evolve as the project progresses. In light of this, the engagement strategy described here should be viewed as a starting point, and the project team will retain flexibility to adapt the engagement strategy as needed.

In addition to the outreach for the Action Plan described here, the Oregon Parks and Recreation Department (OPRD), Federal Highway Administration (FHWA) Western Federal Lands, and the Association of Oregon Counties (AOC) have additional concurrent engagement activities related to the Action Plan process. These activities include AOC stakeholder teams that are engaged on closing OCT gaps and other ongoing coordination with stakeholders. These activities are not described here, though the project team will coordinate all outreach activities with these other efforts.

The study area is broadly defined as the entire Oregon coastline adjacent to the existing OCT route. Appendix A (electronic appendix) provides demographic data for the study area, including coastal communities identified with higher concentrations of people with limited English proficiency and higher concentrations of people who are Hispanic or Latino.

### APPLICABLE FEDERAL REGULATIONS

#### Section 508 Compliance

Section 508 of the Rehabilitation Act of 1973, and associated rules, require that electronic products be accessible to people who have disabilities. The rules include guidance on how to develop materials so that they are readable and understandable for all readers. An example of applying this guidance is adding alternate text to images in documents and avoiding use of color alone to convey information.

## Federal Environmental Justice and Title VI Compliance

The Action Plan is funded in part through a federal grant administered by the FHWA Western Federal Lands. The project must meet requirements described in Executive Order 12898 (EJEO), *Federal Actions to Address Environmental Justice in Minority Populations and Low-income Populations*<sup>1</sup> and Title VI of the Civil Rights Act of 1964.

Title VI provides that “no person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.” Title VI protects people against discrimination due to race, color, national origin, age, sex, disability, or limited English proficiency.

Environmental justice (EJ) is the fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income, with respect to the development, implementation, and enforcement of environmental laws, regulations, and policies. The Executive Order requires each federal agency to “make achieving environmental justice part of its mission by identifying and addressing, as appropriate, disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority populations and low-income populations.” EJ provisions generally apply to the same groups considered by Title VI, as well as people who are low-income.

Title VI and the EJEO protect against discrimination both in terms of outcomes as well as process. Consistent with these rules and guidance, OPRD and the project team will ensure the following:

### **Be inclusive of Title VI and EJ populations along the Oregon Coast.**

- Consider the presence and concentrations of Title VI/EJ populations in the study area, which consists of the entire Oregon Coast and communities along the immediate coastline (see Appendix A that documents these populations).
- Ensure ample opportunity at multiple stages of the process for input from all communities via online and in-person or equivalent feedback opportunities.
- Collect demographic information (anonymously) at all public events to help understand how different populations are reached during the process.
- Consider translating materials into Spanish as appropriate.
- Produce electronic documents in accordance with Section 508 of the Rehabilitation Act of 1973, including following FHWA’s guidance.<sup>2</sup>

**Ensure the planning process does not result in projects that are likely to have a disproportionate negative impact to Title VI and EJ populations, such as displacing or creating barriers between them and the rest of the community.**

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<sup>1</sup> [https://www.environment.fhwa.dot.gov/env\\_topics/environmental\\_justice.aspx](https://www.environment.fhwa.dot.gov/env_topics/environmental_justice.aspx)

<sup>2</sup> <https://www.fhwa.dot.gov/508/docs/had21010.pdf>

The Action Plan will support improving trail facilities along the Oregon Coast. While primarily a state recreation trail, many segments of the OCT provide a local transportation and recreation benefit to communities. It is unlikely that improvement alternatives developed during this process would have disproportionately negative impacts to Title VI or EJ communities. However, the project team will consider impacts to the communities immediately surrounding potential project locations and identify any potential impacts at a level of detail appropriate for this planning-level study, e.g., likelihood of displacements. Projects identified as part of the Action Plan would be subject to further study and review.

## ENGAGEMENT GOALS

- **Encourage the participation of all stakeholders** regardless of race, ethnicity, age, disability, income, or primary language by employing a mix of tools to reach the broadest audience possible. Outreach materials may be translated to Spanish as necessary to encourage participation from limited-English proficiency populations. Based on demographic data in Appendix A, there are higher concentrations of people who are Hispanic or Latino in the cities of Tillamook and Newport as compared to other coastal communities and the state as a whole.
- **Provide early and ongoing opportunities for stakeholders to ask questions, raise issues, or share concerns.** Outreach will occur at three main milestones, but ongoing opportunities to comment will be provided through a project website or existing agency site.
- **Ensure that public feedback is considered in the decision-making process and in development of the Action Plan.** Public feedback on each step of the planning process will be incorporated into decision-making and reflected in relevant evaluation criteria to ensure the final plan reflects the public’s needs and priorities.
- **Explore trade-offs with stakeholders during Project Advisory Group (PAG) and other stakeholder meetings to resolve conflict if necessary,** and drive toward consensus on needs and solutions to ensure a broadly supported Action Plan.

## Engagement Metrics

The following metrics can be used to assess the reach of the engagement program into the Oregon coastal community. The project team will present these statistics as part of engagement summary materials.

- Number of responses to online or in-person engagement events
- Respondent demographics to facilitate comparison to broader coastal demographics
- Respondent location to determine if engagement feedback is geographically distributed

## KEY STAKEHOLDERS

Table 1 lists the major coastal stakeholder groups that have a stake or interest in the Action Plan or that could be affected by the resulting concepts that emerge. These groups should be considered during outreach, whether as participants in advisory committees or as groups to contact during milestone outreach.

**Table 1. Stakeholders**

Stakeholder Category	Examples/Potential Contacts
Government agencies and institutions	<ul style="list-style-type: none"> <li>• Oregon Parks and Recreation Department</li> </ul>

Stakeholder Category	Examples/Potential Contacts
	<ul style="list-style-type: none"> <li>• Association of Oregon Counties</li> <li>• Cities, Counties</li> <li>• Transit agencies</li> <li>• Oregon Department of Transportation</li> <li>• Department of Land Conservation and Development (DLCD)</li> <li>• Oregon Department of Fish and Wildlife</li> <li>• United States Forest Service (USFS)</li> <li>• Oregon Department of Land Conservation and Development</li> <li>• Tribes/First Nations</li> </ul>
Local stakeholders	<ul style="list-style-type: none"> <li>• Business owners</li> <li>• Landowners</li> <li>• Residents, especially those adjacent to gap alignments</li> </ul>
Non-profits	<ul style="list-style-type: none"> <li>• Consejo Hispano (formerly Lower Columbia Hispanic Council, serves Clatsop, Columbia, and Tillamook Counties)</li> <li>• Travel Oregon</li> <li>• Oregon Coast Visitor’s Association</li> </ul>

OPRD and FHWA have convened a PAG for the Action Plan that is composed of representatives of many of the stakeholder groups listed above. The PAG is a conduit to broader stakeholder outreach and will be engaged throughout the process to provide feedback to the project team, but also to help engage other stakeholders and the general public.

## PUBLIC ENGAGEMENT TACTICS AND APPROACH

Table 2 describes the major public engagement milestones, timing, and the proposed engagement methods for each. The consultant team will provide a brief outreach summary at the conclusion of each milestone.

**Table 2. Engagement Approach Summary**

	Milestone 1	Milestone 2	Milestone 3
Purpose/Topic	Introduce the project to stakeholders and provide opportunity for general feedback on the OCT experience. Provides early information about needs that clarify issues that must be addressed by the Action Plan.	Review concepts for closing OCT gaps to identify any red flags or missed opportunities, as well as funding opportunities and the management strategy. Provides opportunity for direct input from the public and stakeholders on the conceptual improvement ideas and other core elements of the Action Plan.	Final opportunity for public and stakeholder input on the elements of the draft Action Plan.
Timing	November and December 2021	May 2022	October 2022
Primary Engagement Goal	Inform stakeholders about the project and provide an early, general opportunity for input	Main opportunity to hear feedback on elements of the Action Plan; confirm approaches to closing OCT gaps	Confirm findings and recommendations in the Action Plan
Engagement Tools	<ul style="list-style-type: none"> <li>• Online survey tool and interactive feedback map</li> </ul>	<ul style="list-style-type: none"> <li>• Updated online survey tool and interactive feedback map</li> </ul>	Online survey for providing feedback on the Action Plan

	Milestone 1	Milestone 2	Milestone 3
	<ul style="list-style-type: none"> <li>Informational webinar for interested stakeholders and members of the public</li> </ul>	<ul style="list-style-type: none"> <li>Webinar to share information and hear feedback from the general public</li> <li>Spanish-language webinar for interested stakeholders and the public</li> <li>Discussion/presentation to Tribes</li> <li>One-on-one or small group meetings as needed with specific individuals or groups</li> </ul>	
Communication Tools	<ul style="list-style-type: none"> <li>Update to the FHWA Action Plan website</li> <li>Fact sheet for posting, printing, and emailing; will contain QR code to online survey and notification about Milestone 2 webinar</li> <li>Email blast to interested parties and stakeholder organizations</li> <li>Notification to Tribes</li> </ul>	<ul style="list-style-type: none"> <li>Update to the FHWA Action Plan website</li> <li>Updated fact sheet for posting, printing, and emailing; will contain QR code to online survey</li> <li>Email blast to interested parties and stakeholder organizations</li> </ul>	<ul style="list-style-type: none"> <li>Update to the FHWA Action Plan website</li> <li>Updated fact sheet for posting, printing, and emailing; will contain QR code to online survey</li> <li>Email blast to interested parties and stakeholder organizations</li> </ul>

The following sections provide more details on the elements in Table 2.

### Engagement Tactics

**Online outreach:** Online outreach will include presentation of materials and online surveys, relying heavily on visuals to convey key information. For an example of an online open house and survey, see: <https://storymaps.arcgis.com/stories/6db06018608849a29b1d1baa1e28b36e>

Paper versions of the survey can be printed and distributed as needed to aid in reaching those who cannot or will not participate online.

**Focused workshops or one-on-ones:** During Milestone #2, focused conversations may be needed with property owners, stakeholders, or jurisdictions to discuss concepts for addressing OCT gaps. It is assumed that the need for these meetings would be identified primarily by AOC staff.

**Webinars:** Webinars are great opportunities to provide more information and details about the project to interested parties. They will be advertised in advance via the fact sheets, email blasts, and updates to the project website. Webinars would generally be 1 hour in length, with 30 minutes for presentation and 30 minutes for questions and answers (Q&A) with project staff. Q&A is handled through chat and text entries by webinar participants (participants are not able to speak during the webinars).

**Spanish-language webinars:** From past experience, the project team knows that the best way to reach the Latinx community is through in-person events or online presentations. Surveys and materials produced in Spanish have historically not garnered significant response. The project team therefore proposes conducting one webinar in Spanish during the course of the project to reach Spanish-speaking communities in the study area.

## Communications

**Fact sheets:** Fact sheets can be posted online and also printed and distributed throughout the coastal communities. The project team will need help from the PAG and other stakeholders/jurisdictions in distributing both electronic and paper version of the fact sheets. Fact sheets will be translated into Spanish.

**Project website:** The existing FHWA website will be updated periodically to provide information, post fact sheets, and also post materials generated as part of the Action Plan process.

**Email blasts:** OPRD and/or FHWA will maintain a list of stakeholder groups who want to receive email updates throughout the project. The consultant team will generate content for these emails.

**Tribal communications:** This engagement plan proposes periodic updates or presentations to interested Tribes. OPRD and FHWA will lead engagement with Tribes.

## Roles and Responsibilities

Table 3 describes the roles and responsibilities for elements of the outreach program.

**Table 3. Outreach Roles and Responsibilities**

Element	Responsibilities
Fact sheets	<ul style="list-style-type: none"> <li>• Consultant to draft content in both English and Spanish</li> <li>• OPRD/FHWA review and comment</li> <li>• OPRD/FHWA distribute to stakeholders and other groups</li> <li>• OPRD to post paper fact sheet at state parks</li> </ul>
Email blasts	<ul style="list-style-type: none"> <li>• Consultant draft content</li> <li>• OPRD/FHWA to maintain interested parties list</li> <li>• OPRD/FHWA to distribute to list</li> </ul>
Tribal communications	<ul style="list-style-type: none"> <li>• OPRD/FHWA to lead all communications with Tribes</li> </ul>
Website	<ul style="list-style-type: none"> <li>• Consultant to draft update content</li> <li>• Consultant to purchase custom domain that redirects to existing website</li> <li>• FHWA to post content</li> </ul>
Webinars	<ul style="list-style-type: none"> <li>• Consultant to develop content</li> <li>• OPRD/FHWA and consultant to co-lead presentation</li> <li>• Consultant to set up webinar software</li> <li>• Consultant to lead Spanish-language webinars</li> </ul>
Online surveys/interactive map tools	<ul style="list-style-type: none"> <li>• Consultant to draft content</li> <li>• OPRD/FHWA to review and comment</li> <li>• Consultant to produce printable version of survey to accompany fact sheet</li> <li>• OPRD/FHWA will distribute paper surveys or printable PDFs to stakeholders upon request</li> </ul>
Small group or one-on-one meetings	<ul style="list-style-type: none"> <li>• OPRD/FHWA to convene and schedule meetings (assumed to be online or over the phone)</li> <li>• Consultant to participate in discussions as needed; no presentation materials are assumed</li> </ul>

Element	Responsibilities
Outreach summaries	<ul style="list-style-type: none"> <li>• Consultant to draft content</li> <li>• OPRD/FHWA to review and comment</li> </ul>