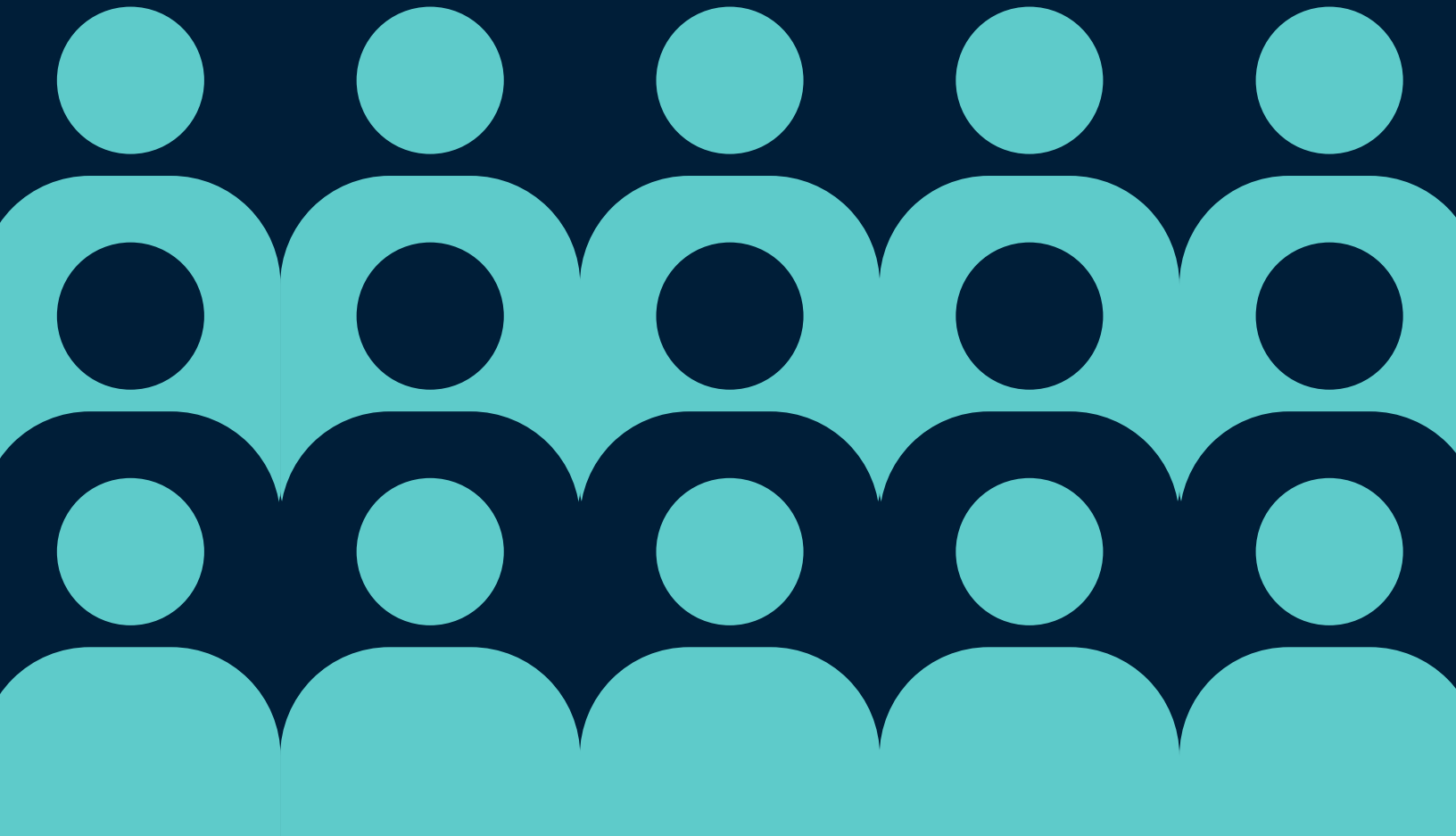




# Public Participation Plan

Draft | September 2025



# Our Vision

Southern California's catalyst  
for a brighter future

# Our Mission

To foster innovative regional solutions that improve the lives of Southern Californians through inclusive collaboration, visionary planning, regional advocacy, information sharing and promoting best practices.

# Our Core Values

## Be Open

Be accessible, candid, collaborative, and transparent in the work we do.

## Lead by Example

Commit to integrity and equity in working to meet the diverse needs of all people and communities in our region.

## Make an Impact

In all endeavors, effect positive and sustained outcomes that make our region thrive.

## Be Courageous

Have confidence that taking deliberate, bold and purposeful risks can yield new and valuable benefits.



# Public Participation Plan

2026 Update - Draft

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## About SCAG

The Southern California Association of Governments (SCAG) is the Metropolitan Planning Organization (MPO) for a region encompassing the areas of Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura counties. SCAG is responsible for developing the Regional Transportation Plan and Sustainable Communities Strategy (RTP/SCS) and its associated Program Environmental Impact Report, the Regional Housing Needs Assessment (RHNA), the Federal Transportation Improvement Program (FTIP), the region's Overall Work Program (OWP) under Caltrans, and administering other state and federal funding programs, which involves collaborating across the region to support their implementation and engage on topics of regional significance.

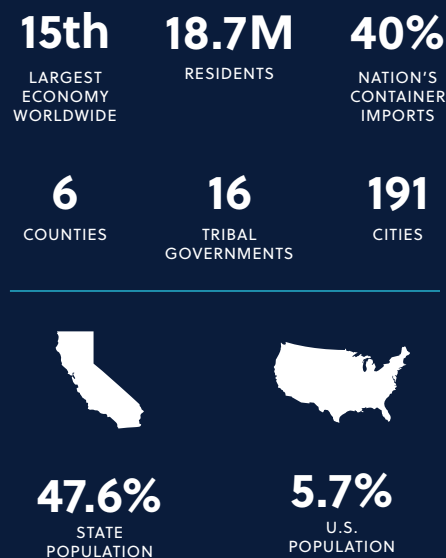
SCAG is the nation's largest MPO and represents one of the most multi-faceted areas in the world, which is home to nearly 19 million people throughout 197 local jurisdictions. SCAG is governed by the Regional Council, a board of 86 elected officials who represent districts across the region.

Public participation is fundamental to SCAG's mission because understanding the needs of local governments, stakeholders, and the public strengthens planning processes. In many ways, SCAG's success relies on meaningful participation.

This Public Participation Plan (PPP) outlines SCAG's vision and commitments to representative, accessible, and effective engagement in the development of its plans, programs, and initiatives. This plan defines audience categories, methodology for conducting participation efforts, summarizes communication activities to be used, and describes SCAG's measures and processes for evaluating public and stakeholder participation.

As SCAG prepares the next RTP/SCS and other major initiatives, this document can guide staff and partners toward engagement that creates plans, programs, and pilots that truly serve the region and can be implemented, while meeting requirements under the law.

## The SCAG Region





## Public Participation Plan Purpose

SCAG is a regional forum and a conduit between local jurisdictions, and state and federal agencies. SCAG's Regional Council and policy committees bring together elected leaders from diverse geographies to guide regional planning in pursuit of shared goals to benefit the region. This level of collaboration requires balancing many different communities' needs, interests, and characteristics to create a cohesive region. Therefore, understanding the needs of the region, including its industries, communities, and lands, is key to making SCAG's plans, programs, and pilots responsive, visionary, and implementable.

As the voice and visioner for the Southern California region, SCAG's work must reflect the multitude of voices, interests, and resources that play a part in the region's systems. Engaging broadly and considering input is essential for effectively balancing numerous factors and is essential to the success of such large-scale efforts for which SCAG is responsible, including the following major activities:

- ▶ Regional Transportation Plan/Sustainable Communities Strategy (Connect SoCal, RTP/SCS)
- ▶ Program Environmental Impact Report for Connect SoCal (Connect SoCal PEIR)
- ▶ Federal Transportation Improvement Program (FTIP)
- ▶ Southern California's Transportation Overall Work Program (OWP)
- ▶ Regional Housing Needs Allocation (RHNA)

These practical considerations for creating acceptable and implementable plans as well as state and federal requirements shape the agency's approach to public participation and influence how SCAG engages across a variety of audiences that can be grouped into three broad categories: 1) public entities, 2) stakeholders, and 3) the public.



1. **SCAG's primary working relationships are with public entities, which both guide and implement SCAG's work.** Public entities, including municipalities, local government entities, state political subdivisions, and federally recognized tribal governments are part of SCAG's General Assembly, Regional Council and policy committees, as well as other ad-hoc committees that shape SCAG's work. Local jurisdictions also implement SCAG's regional plan, engaging with SCAG programs for funding, technical assistance, data, trainings, and other resources. SCAG also works with numerous other public entities, collaborating to ensure alignment across local, regional, state, and federal priorities as required by law across various processes.
2. **As a convener in a complex region, SCAG interacts with numerous stakeholders across a broad range of topics and interests.** Throughout the agency's history, SCAG's Regional Council has approved various resolutions that have been integrated into the regional planning process. These resolutions call for collaboration with stakeholders across sectors on topics ranging from clean vehicle technology, water supply, resilience, social equity, broadband, goods movement, and more. These Regional Council actions demonstrate the breadth of stakeholders that SCAG must connect with to effectively inform and conduct its work; they are also consistent with Sustainable Communities Strategy planning requirements to include advocates and business interests in regional plan development.
3. **When engaging with the general public, SCAG values representative input that identifies the region's needs and operates transparently.** All people who live in Southern California are stakeholders in regional planning outcomes. Federal Regulations (23 C.F.R. § 450.316), the Civil Rights Act, Sustainable Communities Strategy planning requirements, and SCAG's own Regional Council resolutions mandate that participation efforts emphasize underserved populations. SCAG's own Racial Equity Early Action Plan (2021) calls to reduce bias and barriers in the planning process. Considering this guidance and the size of the SCAG region, SCAG designs public engagement efforts to capture input representative of all facets of the region's population. As a government agency, transparency is also key, with all public input opportunities open to anyone who responds or seeks them out. SCAG conducts its business openly and transparently, with document and proceedings accessible online and open to the public. Additionally, SCAG provides ample availability for engagement and input. All members of the public are welcome to attend and participate in publicly noticed meetings at SCAG, such as the various subcommittees, working groups, policy committees, Executive/ Administration Committee, and the Regional Council.

## State and Federal Requirements

SCAG's Public Participation Plan was developed in accordance with federal and state laws and regulations which set forth SCAG's responsibilities as an MPO. In summary, these requirements direct SCAG's public engagement work as follows:

- ▶ **Inclusive Public Participation:** Public participation activities seek input, with effort to engage traditionally underserved groups, such as minorities, low-income households, people with limited English proficiency, seniors, and people with disabilities.
- ▶ **Accessibility and Transparency:** Information related to planning and public processes provided in clear, accessible formats. Public meetings and hearings are scheduled at accessible locations and times, with adequate notice.
- ▶ **Visualization and Clarity:** Visualization techniques to clearly communicate complex information to the general public.
- ▶ **Consultation and Coordination:** Transportation planning includes consultation and coordination with relevant stakeholders, such as local and state agencies, tribal governments, federal land management agencies, resource agencies, and transportation service providers.
- ▶ **Response, Documentation, and Reporting of Public Input:** Public input received during engagement processes is documented and publicly reported. Consideration of public input and documentation of responses is provided to explain how input influenced final decision, especially when significant changes are involved. Mandatory minimum public review or comment periods for significant planning documents.
- ▶ **Tribal Consultation:** Tribal governments are consulted regarding transportation projects and policies affecting tribal lands or resources in accordance with SCAG's [Tribal Consultation Policy](#).
- ▶ **Compliance with Non-Discrimination Laws:** Participation efforts comply with federal and state anti-discrimination laws and regulations, including Title VI of the Civil Rights Act, ADA requirements, and environmental justice provisions, to provide equitable treatment and accessibility.
- ▶ **Integration of Planning Processes:** Transportation planning integrates with other planning activities, such as land use, housing, environmental review, and air quality management, and considers multiple scenarios and performance measures.
- ▶ **Periodic Reviews and Updates:** Public participation procedures and strategies are regularly reviewed and updated to maintain effectiveness, responsiveness, and compliance with current regulations.

Please see the Appendix for a listing of SCAG's statutory requirements and applicable regulations.

## Who SCAG Engages

In serving an expansive and diverse region, SCAG's decision-making and advisory bodies include elected officials from across Southern California, including counties, cities and tribal governments. These bodies play a vital role in setting regional priorities, approving plans, and ensuring that community needs are reflected in SCAG's work by giving a voice to all SCAG districts, including six seats for tribal government representatives. As such, members of SCAG's Regional Council, policy committee, and General Assembly are important bidirectional messengers in representing their communities' needs in SCAG's work and sharing it back out into the region.

Building on the role of this core governing group, SCAG structures its audiences into the following segments to structure engagement activities, creating deeper understanding of SCAG's relationship with each to improve communication and ensuring connection with groups at appropriate phases of the regional planning process.

## SCAG Audiences (in alphabetical order)

### 1. County Transportation Commissions

County Transportation Commissions are essential funding and implementation partners in regional transportation planning. SCAG works closely with these commissions to coordinate planning efforts, align funding strategies, and ensure consistency between regional and county-level investments. These entities have representation on SCAG's Regional Council and are (in alphabetical order):

- ▶ Imperial County Transportation Commission
- ▶ Los Angeles County Metropolitan Transportation Authority
- ▶ Orange County Transportation Authority
- ▶ Riverside County Transportation Commission
- ▶ San Bernardino County Transportation Authority
- ▶ Ventura County Transportation Commission

### 2. General Public

SCAG considers all members of the public, including all people who live in its six-county region to be part of the general public audience. This audience is broad and refers to all individuals, regardless of age, background, abilities, status, or education level. Consistent with federal and state requirements, SCAG puts special efforts into engaging historically underserved communities. SCAG also makes a point to engage with youth, who have a greater stake in the region's long-term future. Public Participation activities always include open input opportunities, information accessible to people of varying backgrounds, and efforts to capture representative input.

### **3. Grantees**

SCAG provides funding and technical support to a range of grantees, many of whom are also part of other audience categories, including jurisdictions, stakeholders, county transportation commissions, or other government agencies. Through various competitive and non-competitive calls for applications and notices of funding availability, SCAG notifies prospective grantees of opportunities for grant subawards. The grantees often lead on-the-ground implementation of SCAG-supported projects and are responsible for conducting community engagement consistent with SCAG's public participation standards.

### **4. Legislators, Funders, and Regulators**

This group includes appointed and elected officials and representatives of state and federal agencies, and the agencies themselves, that fund or regulate SCAG's planning efforts. Engagement with this audience ensures that SCAG's work aligns with policy objectives, funding criteria, and legal obligations. Examples of these include federal agencies, such as Federal Highway Administration (FHWA) and Federal Transit Administration (FTA), federal land management agencies, and state agencies including Caltrans, the California Air Resources Board (CARB) and the Department of Housing and Community Development (HCD).

### **5. Local Jurisdictions**

SCAG's core membership consists of six counties, 191 cities, and 16 tribal governments. These local jurisdictions and tribal governments are instrumental in shaping regional plans through their data, forecasts, and input and implementation activities. SCAG also engages elected officials and jurisdiction departments staff at the local level on a regular basis as part of its ongoing operations to understand the needs of the region and connect jurisdictions to resources.

### **6. Other Public Agencies**

Other public entities beyond SCAG's direct jurisdiction play a key role in regional planning via coordination, input, and implementation. These include entities such as ports, transit operators, public utilities, air districts, and any other government agencies that oversee or manage critical infrastructure and resources in Southern California.

### **7. Stakeholders**

Stakeholders include business and industry representatives (freight, real estate, construction, manufacturing, etc.); community-based organizations, non-profit organizations, and advocacy groups; and other non-government entities that bring critical expertise, represent communities and sectors, and help shape SCAG's policy and program priorities.

## Audience Communication Preferences

Since its last Public Participation Plan update, SCAG's collected qualitative and quantitative audience feedback. This evaluation effort included surveys, listening sessions, and interviews designed to understand audience member priorities, identify barriers to participation, and assess communications and information-sharing preferences.

Findings confirmed that SCAG's audiences come from a variety of backgrounds, vary greatly in the level of time and resources available to them, and often serve as intermediaries to a more general public audience. Therefore, SCAG communication emphasizes:

- ▶ Readable, jargon-free materials that facilitate clear understanding that can assist audience members in communicating the information themselves.
- ▶ Information resources that can easily be shared and adapted by partner audiences for distributing to their own constituents or audiences.
- ▶ Varying levels of technical detail for different users, including summaries for lengthy documents, such as technical reports, large-scale plans, and research and white papers.



# SCAG's Public Participation Standards

SCAG's public participation commitments are rooted in our strategic priorities, federal and state requirements, and the recognition that meaningful public input leads to better planning outcomes. The following principles guide all SCAG engagement activities:



## 1. Representative Input

**SCAG will pursue public and stakeholder input that reflects the diversity of the region and is tailored to the specific needs and goals of each program or planning effort.** SCAG makes all efforts to design participation activity so as to solicit input that is relevant and actionable, furthering SCAG's understanding of the needs of the region's population and how to be responsive to them. Engagement efforts are tailored to each audience, recognizing that different stakeholders require different tactics to reach them, have varying levels of familiarity with planning processes, and differing amounts of time available for sharing their input. SCAG's participation strategies aim to capture relevant viewpoints by targeting the specific audience for whom the program supports, as well as ensure representation of historically underserved communities, including limited English proficiency populations and persons with disabilities, as required by law.



## 2. Compliance

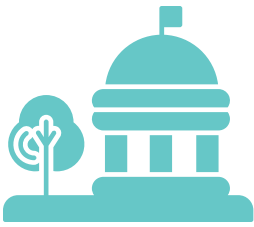
**All engagement activities are structured to comply with federal and state mandates for public involvement, interagency coordination, and transparency.** This includes compliance with 23 C.F.R. § 450.316, the Civil Rights Act, and Sustainable Communities Strategy planning guidance that require engaging underserved communities, as well as other state and federal regulations that specify coordination with specific agencies, and include requirements about making information, processes, and meetings open and available to the public.



## 3. Communication Best Practices

**SCAG is committed to communication that encourages understanding of its content across various audiences.** Plain language is used as much as possible in all public-facing materials and interactions, where technical terms are minimized and clearly defined, and key messages are prioritized using clear information hierarchies. This approach allows stakeholders of varying technical backgrounds, education levels, and time constraints to understand SCAG's plans, participate in discussions, and provide informed feedback. Visual communication, such as diagrams, infographics, and maps, are used wherever possible to help break down complex information and to increase accessibility for people with differing backgrounds, proficiencies, and learning styles. Consistency in terminology and framing across documents and presentations increases the likelihood of understanding.

## Participation Methodology Based on Audience



### Government and Stakeholder Participation

When working with government and stakeholder audiences, SCAG will approach engagement as a **collaborative and bidirectional process**. This means enabling dialogue through SCAG or partner hosted events and meetings that may include forums, listening sessions, working groups, and focused meetings.

SCAG recognizes that many government and stakeholder partners are also conduits to broader public audiences as well as secondary and tertiary audiences. Therefore, SCAG's commitment to **clarity and accessibility** carries into communication with these audiences. Participation materials and presentations should avoid excessive jargon, clearly convey key takeaways, and in some cases be sharable content that partners can use to inform their own constituencies.

Participation strategies should be **tailored to the specific needs and communication preferences** of each stakeholder group, considering factors such as technical expertise, organizational capacity, and time commitment. Where appropriate, SCAG will provide **toolkits, talking points, or co-branded resources** that stakeholders can adapt and distribute.



### Public Participation

When engaging the general public, SCAG will design participation efforts to capture **representative input** from across the region's diverse communities, with particular attention to gathering input from populations that have been historically underserved.

Participation tactics should be **tailored to the scope and goals** of the specific planning effort. SCAG commits to carefully considering and selecting effective and feasible methods to reach and engage target audiences within available resources, timelines, and budgets. Tactics may vary (see Public Participation Tactics Toolbox below) and evolve over time as technology advances, costs evolve in the market, and public media and information consumption behaviors change. At minimum, SCAG's public-facing information will be made available via SCAG's owned channels, including the agency website, newsletters, and social media—and must be **open and accessible to all via open comment periods** with clear timelines and directions for how to participate.

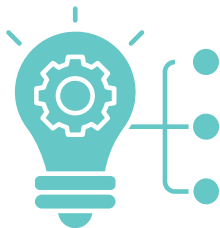


## Transparency and Accessibility

Transparency and accessibility are **separate from but complementary to participation** and are mandatory for compliance with the Americans with Disabilities Act (ADA), the Brown Act, and Title VI of the Civil Rights Act. When directly engaging with the general public, SCAG will conduct its business openly and transparently and will provide opportunities for all members of the public to participate and provide direct input. SCAG staff must ensure that the **public has ongoing access** to information about government functions, use of public resources, planning processes, timelines, and key decision points. This includes:

- ▶ Making documents, data, and summaries related to SCAG processes and decisions easily **available online in accessible formats**, including livestreaming and recordings of public proceedings.
- ▶ Providing **language translations and disability accommodations** in accordance with SCAG's [Title VI Program](#), ADA requirements, and upon request.
- ▶ Offering **email subscription options** for regular project updates and meeting notifications.

Staff will also **document, summarize, and report on public comments** received through public engagement activities. This process demonstrates that input has been meaningfully considered and supports accountability and transparency in SCAG's decision-making.



## Public Participation Tactics Toolbox

SCAG maintains a menu of participation tactics that can be tailored to reach different audiences, depending on the goals, resources, and timeline for the individual effort at-hand. This toolbox is intended to implement participation according to SCAG's standards and methodology described in the previous sections.

A combination of these tactics are to be selected based on specific engagement objectives, which will include one or more of the following:

- ▶ **Reach:** For awareness and visibility (e.g., advertising, earned media)
- ▶ **Engagement:** For interaction and participation (e.g., events, social media)
- ▶ **Input:** For formal comment and feedback (e.g., surveys, meetings)
- ▶ **Transparency:** For open access to documents and data (e.g., web publication, livestreaming)

Public participation tactics are categorized based on the resources and amount of complexity required to deploy them, as well as the general levels of reach that can be achieved. In most cases, tactics from all categories will need to be combined to effectively provide information, create a mechanism for SCAG to receive feedback or input, and broaden the reach of other tactics to support SCAG's public participation commitments outlined earlier in this document.



## SCAG-Owned Tactics

Owned tactics include platforms controlled by SCAG, which require the least amount of resources and shortest lead times. These tactics tend to reach audiences already connected to SCAG whom it engages with regularly, and are carried out in accordance with its Title VI Program.

- ▶ **Newsletters** to SCAG's subscriber lists on a regular basis and include regular updates about current work, such as meetings, publications, comment periods, and other input opportunities.
- ▶ **Email blasts** for special announcements to segments of SCAG's existing contact list.
- ▶ **SCAG's website**, which includes descriptions of the agency's programs and products; calendar of upcoming and past meetings; and a news feed where information is regularly published, such as new reports and studies, the monthly Executive Director's report, and funding processes, including guidelines, comment periods and more.
- ▶ **Organic social media** where SCAG regularly posts news for its followers on popular platforms (i.e. Facebook, X, Instagram, LinkedIn, YouTube) about its work, including meetings, special events, funding awards, public comment periods and more. These posts often include graphics, photos, videos, and links to SCAG publications and webpages. SCAG's social media profiles are located at the following URLs:
  - ▶ [www.facebook.com/SCAGmpo](https://www.facebook.com/SCAGmpo)
  - ▶ [www.x.com/SCAGnews](https://www.x.com/SCAGnews)
  - ▶ [www.instagram.com/SCAGnews](https://www.instagram.com/SCAGnews)
  - ▶ [www.youtube.com/SoCalAssociationGov](https://www.youtube.com/SoCalAssociationGov)
  - ▶ [www.linkedin.com/company/southern-california-association-of-governments](https://www.linkedin.com/company/southern-california-association-of-governments)
- ▶ **Public and stakeholder meetings, events, and workshops** hosted by SCAG that include a variety of formats, such as meetings of a formal governing body, open houses, public hearings, listening sessions, and themed workshops. These meetings can include customized presentations, question and answer sessions, comments directly to elected officials, dialogue in breakout sessions, program demonstrations, and a number of other collaborative information gathering techniques. These meetings include:
  - ▶ **SCAG General Assembly**

At least once every year, SCAG convenes its General Assembly to bring together the official representatives of SCAG's membership and help set the agency's course for the coming year. This typically happens in May and is publicly noticed and open to the public in accordance with applicable laws.

#### ► SCAG Regional Council

All of SCAG's plans and programs are led by decision making by its Regional Council, an 86-member governing board of elected officials, including city representatives from throughout the region, at least one representative from each county Board of Supervisors, a Transportation Commission member, and a representative of the Southern California Native American Tribal Governments. The region is divided into districts of roughly equal population to provide diverse, broad-based representation. The Regional Council meets monthly on the first Thursday of the month and meetings are open to the public. Specific meeting dates and times are posted on SCAG's website, along with agenda materials posted 72 hours in advance for regularly scheduled meetings. Members of the public are welcome to attend and provide input, either by submitting a comment on an individual agenda item or making general comments. Comments can also be provided by letter or email in advance of the meeting.

#### ► SCAG Policy Committees

SCAG's policy-making process is guided by the work of three Policy Committees: Transportation Committee (TC); Community, Economic and Human Development (CEHD) Committee; and Energy and Environment Committee (EEC). Members of the Regional Council are appointed to one of the policy committees for two-year terms. Most of the discussion and debate of a policy issue occurs in these committees. Issues to be considered by the Regional Council must come through one or more of the committees. As opposed to Regional Council members, members of policy committees do not have to be elected officials. The policy committee meetings typically occur in the morning on the same day as the Regional Council meetings. Members of the public are welcome to attend and provide input, either by submitting a comment on an individual agenda item or making general comments. The posted agenda for regular meetings is available at least 72 hours before the meeting.

#### ► Technical Advisory Committees and Working Groups

These are focused groups convened to work on specific topic areas and provide input to SCAG staff before items are brought to SCAG's Policy Committees or Regional Council. These meetings fall along a spectrum of more technical to more policy-focused agenda items with some groups covering items from both categories. A few examples of the technical groups include the Modeling Task Force, Transportation Conformity Working Group, and the Technical Working Group. SCAG also hosts a series of Regional Planning Working Groups which function as a forum for SCAG staff to engage stakeholders in the development and implementation of the agency's plans and policies. These policy groups focus on areas such as Safe and Active Streets; Equity; Natural and Farmlands Conservation; Housing; and Sustainable and Resilient Communities. The frequency of meetings varies per group, but most meet on at least a quarterly basis.

► Special Public Meetings, Conferences and Forums

Public and stakeholder meetings on specific issues are held as needed. If statutorily required, formal public hearings are conducted and publicly noticed. SCAG typically provides notice through posting information on SCAG's website and, if appropriate, through email notices, newsletters, partnership channels, in-person contact, and to local media outlets when appropriate. Materials to be considered at SCAG public hearings are posted on SCAG's website and are made available to interested persons upon request.

► Workshops, Community Forums and Other Events

SCAG conducts workshops, community forums, and other events to keep the public informed and involved in various high-profile transportation projects and plans, and to elicit feedback from the public, interested parties and stakeholders. SCAG holds meetings throughout the six-county region to solicit comments on major plans and programs. Meetings may take place where people are already gathered or when SCAG hosts an event, it does so at locations and at times that maximize public participation, including evenings and weekends. Depending on the audience for these events, SCAG will provide notice as appropriate through the public outreach channels noted in Participation Tactics Toolbox section.

In accordance with the law, these meetings offer accommodation for disabilities or those needing translation and are often livestreamed, hosted virtually or during evenings and weekends to increase accessibility. Most of these meetings are available for viewing virtually and all public meetings can be viewed in-person any SCAG location:

Main Office (for in-person meetings and U.S. Post mail):

Southern California Association of Governments  
900 Wilshire Blvd., Ste. 1700  
Los Angeles, CA 90017

Imperial County  
1503 N. Imperial Ave., Ste. 104  
El Centro, CA 92243

Orange County  
600 S. Main St., Ste. 1143  
Orange, CA 92868

Inland Empire  
(Riverside and San Bernardino Counties)  
3403 10th St., Ste. 805  
Riverside, CA 92501

Ventura County  
4001 Mission Oaks Blvd., Ste. L  
Camarillo, CA 93012

- ▶ **One-on-one or group in-person engagement** is often conducted by staff reaching out to stakeholder contacts via phone call, email, or having virtual or in-person meetings. Government Affairs act as point of contact for many of SCAG’s audiences and are assigned by geographical subregion:

**Imperial and Western Riverside Counties:**

David Salgado  
[salgado@scag.ca.gov](mailto:salgado@scag.ca.gov)  
 (213) 236-1967

**Orange County:**

Jonathan Davis  
[davis@scag.ca.gov](mailto:davis@scag.ca.gov)  
 (213) 630-1599

**Inland Empire:**

Ivette Macias  
[macias@scag.ca.gov](mailto:macias@scag.ca.gov)  
 (213) 630-1499

**Ventura County:**

Rachel Wagner  
[wagner@scag.ca.gov](mailto:wagner@scag.ca.gov)  
 (213) 236-1960

**Los Angeles County:**

Erik Rodriguez  
[rodrigueze@scag.ca.gov](mailto:rodrigueze@scag.ca.gov)  
 (213) 630-1525

- ▶ SCAG creates and produces **informational printed materials** for distributing at events, meetings, or other gatherings when appropriate. These materials are translated in instances of engagement with Limited English Proficiency (LEP) populations in accordance with its [Title VI Program](#).
- ▶ **Forms and surveys**, created by SCAG in both online and printed formats, are used to gather input in structured and open-ended ways, depending on the nature of the effort for which input is being collected.
- ▶ SCAG maintains a **dedicated phone line** at (213) 236-1895 where anyone can request accommodations or translations, leave public comments, or receive information on procedures for filing a Title VI complaint. This phone number is included in public meeting materials and offered as a means for public comment on informational materials in print and on the website.
- ▶ SCAG accepts **public comment** in person at meetings, via U.S. Post and email, and via a dedicated phone line. Comments are summarized and publicly reported according to SCAG’s participation standards for transparency.

Main Office (for in-person meetings and U.S. Post mail):  
 Southern California Association of Governments  
 900 Wilshire Blvd., Ste. 1700  
 Los Angeles, CA 90017  
 Email: [contact@scag.ca.gov](mailto:contact@scag.ca.gov)  
 Telephone: (213) 236-1895



## Partnership Tactics

Activity in this category relies on third-party messengers who share SCAG's information at no cost because it aligns with their mission. These tactics are akin to earned media and help to extend SCAG's reach to these partners' audiences. These tactics have the potential for greater reach than owned tactics but can be more complicated to execute because they often require greater coordination and lead time. Examples of partnership, or earned, tactics include:

- ▶ **SCAG reaches out and responds to media outlets and publications**, including broadcast, print, digital, and in languages other than English to share its work and potentially generate earned media coverage. This can be conducted via news releases, media advisories, media interviews, and editorial placements and meetings – and allows SCAG to share about public involvement processes, plans, and other activity more broadly if media outlets determine it to be newsworthy.
- ▶ SCAG works with various partner groups to carry its information via **partner channel placements**, such as newsletters, websites, podcasts, or organic social media posts via partner organization handles. These are provided at no cost to SCAG and reach individuals who may not be in SCAG's contact list or subscribe to updates directly from SCAG.
- ▶ Similarly, SCAG pursues opportunities to share information at **partner events or partner sites** at no cost. Examples of may include speaking, tabling to hand out printed materials and engage with attendees at a partner's event, or gathering survey input via intercept on partners' property, such as at transit stops, public plazas, businesses, or other areas where audiences that SCAG wishes to reach are present or gathered.
- ▶ These tactics may include other types of unpaid **community partnerships** wherein SCAG works with local groups to generate input in various ways that can help it to gather representative input. This can take many forms and may include in-kind presence at a partner's event, partner organization staff assisting in distributing SCAG materials or surveys, or partner groups publicly speaking about SCAG programs, publications, funding opportunities, or comment periods.



## Paid Tactics

Paid tactics involve a monetary cost, making them the most time and resource intensive category. However, these tactics can reach audiences far beyond SCAG's and its partners' existing networks, and can be an important means of gathering representative input.

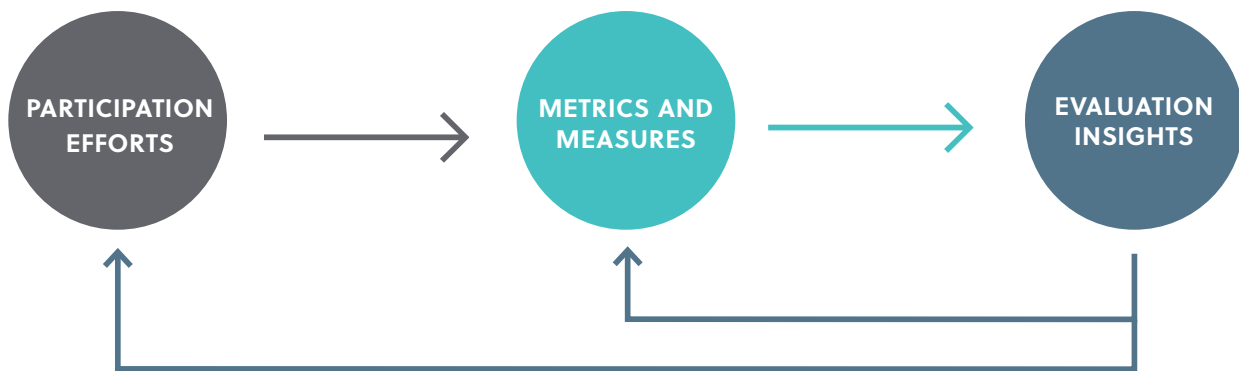
- ▶ **Advertising** placements, including in-home and out-of-home. This includes but is not limited to outdoor advertising, such as billboards and bus shelters; online advertising, such as digital programmatic, pre-roll, or paid social media; print advertising in local or trade publications; broadcast advertising on various forms of television or radio; or unique advertising placement locations, geographically targeted flyer distribution, influencer marketing, etc.
- ▶ **Event sponsorships** that often include exposure via speaking roles, tabling, or other integration in the event program. These types of placements may also include **event tabling**, which includes the purchase of a booth space at events like community festivals or farmers' markets where people gather.
- ▶ **Direct mail** allows SCAG to send printed information directly to audiences in a specific geographical area or target individuals with certain interests via purchased mailing lists.
- ▶ Similarly, SCAG may pursue paid **text campaigns** or **telephone town halls** in instances where these activities align with engagement objectives and provide reach to desired audiences.
- ▶ **Research methods**, such as paid survey participation and panels, focus groups, and research interviews can allow SCAG to generate representative input at a smaller scale with representative samples and to access population groups that may be otherwise difficult to identify and reach.
- ▶ **Community partnerships** can also function in a paid arrangement wherein SCAG enters into an agreement with another group to help it gather representative input for an agreed upon amount of funding. Similar to unpaid partnerships, these can take many forms, examples of which may include partner organization staff assisting in distributing SCAG materials or surveys to their existing audiences, assisting SCAG in fielding input and comment periods, or partner groups publicly speaking about SCAG programs, publications, funding opportunities, or comment periods.

## Evaluation and Iteration

SCAG is committed to continuous improvement in its engagement practices and regularly measures the effectiveness of its communication and engagement work. Quarterly internal reporting measures the following key metrics and measures corresponding user data when available.

- ▶ **Audience reach**, such as email opens, website or video views, or ad impressions to gauge overall visibility.
- ▶ **Engagement**, such as clicks, resource downloads, interactions in-person and/or online, etc. to understand audience interest and interactions.
- ▶ **Attendance** at in-person meetings, webinar trainings, etc., to measure the impact of SCAG-hosted touchpoints.
- ▶ **Input received**, such as survey responses, web form entries, or email feedback that provides qualitative and quantitative insights into audiences' preferences and priorities. Measuring the amount of input received also provides insight on the effectiveness of the participation tactics used to generate it.

Evaluation findings are synthesized to identify trends, highlight opportunities, and elevate successful strategies. These insights are used to refine future participation efforts in regional planning cycles to ensure that each round of engagement is effective and aligned with audience preferences and participation standards.



# Appendix – State and Federal Requirements

## Federal Requirements

### Federal Metropolitan Transportation Planning

The provisions of Title 23 USC Section 134 et seq. provides direct authority for Metropolitan Planning Organizations (MPOs) such as SCAG to act as a regional transportation planning organization with direct responsibility for carrying out the Regional Transportation Plan (RTP). SCAG is tasked with carrying out the transportation planning process and adopting long-range transportation plans. Collaborating with state and public transportation operators, SCAG undertakes a performance-driven, outcome-based approach to planning for the six county regions. SCAG must prepare a transportation plan to be updated every four years, including identification of transportation facilities and factors for each mode of non-motorized transport to major roadways, transit, multimodal and intermodal facilities, and connectors that should function as an integrated system serving regional transportation functions. The scope of transportation planning process is to provide consideration of projects and strategies that will achieve the following objectives (23 U.S.C. Section 134(g)(3)(A)):

- ▶ Support the economic vitality of the metropolitan area, especially by enabling global competitiveness, productivity, and efficiency;
- ▶ Increase the safety of the transportation system for motorized and non-motorized users;
- ▶ Increase the security of the transportation system for motorized and non-motorized users;
- ▶ Increase the accessibility and mobility of people and for freight;
- ▶ 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; Enhance the integration and connectivity of the transportation system, across and between modes, for people and freight;
- ▶ Promote efficient system management and operation;
- ▶ Emphasize the preservation of the existing transportation system;
- ▶ Improve the resiliency of and reliability of the transportation system, and reduce stormwater impacts of surface transportation; and
- ▶ Enhance travel and tourism

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

On August 10, 2005, the President George W. Bush signed into law the Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users (SAFETEA-LU) which guaranteed funding for highways, highway safety, and public transportation totaling \$244.1 billion, at the time the largest surface transportation investment in the United States. The goals of SAFETEA-LU were to improve safety, reduce traffic congestion, improve efficiency in freight movement, increase intermodal connectivity, protect the environment, and lay the groundwork for addressing future challenges.

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

On July 6, 2012, President Obama signed into law P.L. 112-141, the Moving Ahead for Progress in the 21st Century Act (MAP-21). Funding surface transportation programs at over \$105 billion for fiscal years (FY) 2013 and 2014, MAP-21 is the first long-term highway authorization enacted since 2005. MAP-21 represents a milestone for the U.S. economy – it provides needed funds and, more importantly, it transforms the policy and programmatic framework for investments to guide the growth and development of the country's vital transportation infrastructure.

## **Fixing America's Surface Transportation (FAST) Act**

The Fixing America's Surface Transportation (FAST) Act (Pub. L. No. 114-94), enacted in 2015, builds on the changes to federal transportation planning law made by MAP-21. It was the first long-term surface transportation authorization enacted in a decade that provides long-term funding certainty for surface transportation (FHWA 2018). The FAST Act authorized \$305 billion over fiscal years 2016 through 2020 for highway improvements, highway and motor vehicle safety, public transportation, motor carrier safety, hazardous materials safety, rail, and research, technology, and statistics programs. The FAST Act maintains the focus on safety, keeps intact the established structure of the various highway-related programs, continues efforts to streamline project delivery, and provides a dedicated source of federal dollars for freight projects.

Under the FAST Act and its predecessors, MPOs such as SCAG must prepare long-range transportation plans and update them every four years if they are in areas designated as "nonattainment" or "maintenance" for federal air quality standards. Per federal requirements, long-range transportation plans must:

- ▶ Be developed through an open and inclusive process, that ensures public input; seeks out and considers the needs of those traditionally underserved by existing transportation systems;
- ▶ Consults with resource agencies to ensure potential problems are discovered early in the planning process;
- ▶ Be developed for a period of not less than 20 years into the future; long-range transportation plans must reflect the most recent assumptions for population, travel, land use, congestion, employment and economic activity;
- ▶ Have a financially constrained element, transportation revenue assumptions must be reasonable, and the long-range financial estimate must take into account construction-related inflation costs;

- ▶ Include a description of the performance measures and performance targets used in assessing the performance of the transportation system;
- ▶ Include a system performance report evaluating the condition and performance of the system with respect to performance targets adopted by the state that detail progress over time;
- ▶ Include multiple scenarios for consideration and evaluation relative to the state performance targets as well as locally developed measures;
- ▶ Conform to the applicable federal air quality plan, called the State Implementation Plan, for ozone and other pollutants for which an area is not in attainment; and
- ▶ Consider planning factors and strategies in the local context.

## Infrastructure Investment and Jobs Act

On November 15, 2021, President Biden signed the Infrastructure Investment and Jobs Act (IIJA) (Public Law 117-58, also known as the “Bipartisan Infrastructure Law”) into law. The Bipartisan Infrastructure Law is the largest long-term investment in our infrastructure and economy in US history. It provides \$550 billion over fiscal years 2022 through 2026 in new Federal investment in infrastructure, including in roads, bridges, and mass transit, water infrastructure, resilience, and broadband.

## 23 C.F.R. § 450.316 Requirements

Title 23 of the Code of Federal Regulations Section 450.316 describes the specific requirements for a metropolitan planning organization’s public participation plan. The MPO shall develop the participation plan in consultation with all interested parties and shall, at a minimum, describe explicit procedures, strategies and desired outcomes for:

- ▶ Providing adequate public notice of public participation activities and time for public review and comment at key decision points, including a reasonable opportunity to comment on the proposed metropolitan transportation plan (SCAG’s Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) and the regional transportation improvement program (TIP);
- ▶ Providing timely notice and reasonable access to information about transportation issues and processes;
- ▶ Employing visualization techniques to describe metropolitan transportation plans and TIPs;
- ▶ Making public information (technical information and meeting notices) available in electronically accessible formats and means, such as the World Wide Web;
- ▶ Holding any public meetings at convenient and accessible locations and times;
- ▶ Demonstrating explicit consideration and response to public input received during the development of the metropolitan transportation plan and the TIP;
- ▶ Seeking out and considering the needs of those traditionally underserved by existing transportation systems, such as low-income and minority households, who may face challenges accessing employment and other services;

- ▶ Providing an additional opportunity for public comment, if the final metropolitan transportation plan or TIP differs significantly from the version that was made available for public comment by the MPO and raises new material issues that interested parties could not reasonably have foreseen from the public involvement efforts;
- ▶ Coordinating with the statewide transportation planning public involvement and consultation processes; and
- ▶ Periodically reviewing the effectiveness of the procedures and strategies contained in the participation plan to ensure a full and open participation process.
- ▶ Posting a summary, analysis, and report on the disposition of comments when significant written and oral comments are received on the draft RTP/SCS and TIP as a result of the public participation process or the interagency consultation process under the EPA transportation conformity regulations.
- ▶ Providing a minimum 45-day public comment period for the PPP with copies of the plan provided to FHWA and FTA and posted to the internet.

When developing the RTP/SCS and TIP, the MPO should consult with agencies and officials responsible for planning activities in the area that are affected by transportation with such planning activities. In addition, the MPO shall develop the RTP/SCS and TIP with due consideration of other related planning activities in the area with the processing allowing for the design and delivery of transportation services that are provided by: (1) recipients of assistance under title 49 U.S.C. Chapter 53; (2) governmental agencies and non-profit organizations that receive Federal assistance from a source other than the U.S. Department of Transportation to provide non-emergency transportation services; and (3) recipients of assistance under 23 U.S.C. 201-204.

When the Metropolitan Planning Area (MPA) includes Tribal lands, the MPO shall appropriately involve the Indian Tribal government(s) in the development of the RTP/SCS and TIP. Likewise, when the MPA includes Federal public lands, the MPO shall appropriately involve the Federal land management agencies in the development of the RTP/SCS and the TIP. The MPO must also develop a documented process(es) that outlines roles, responsibilities, and key decision points for consulting with other governments and agencies. (See 23 C.F.R. § 450.316).

## **Title VI of the Civil Rights Act of 1964**

Title VI of the Civil rights act of 1964 requires that transportation planning and programming be nondiscriminatory on the basis of race, color, national origin, or disability. Title VI serves as the legal foundation for what is today referred to as Environmental Justice. Under Title VI, the U.S. Department of Transportation (DOT) has oversight responsibility for ensuring that recipients do not use DOT funds to subsidize discrimination based on race, color, or national origin. As part of Title VI requirements, SCAG provides an annual Title VI certification and assurance. (See separate document).

## **Tribal Consultation Policy**

SCAG adopted its [Policy for Consultation with Federally Recognized Indian Tribal Government and Federal Land Management Agencies](#) in January 2019 and is updating that document concurrent with the adoption of this PPP. This policy sets forth SCAG's procedures in consulting with Tribal Governments and federal land management agencies with the goal of maximizing opportunities for Tribal Governments and federal agencies to engage in SCAG's planning, programming and policymaking processes, especially in relation to the development of its RTP/SCS and TIP.<sup>[1]</sup>

## **Americans with Disabilities Act of 1990 (ADA)**

The Americans with Disabilities Act of 1990 (ADA) describes actions for non-discrimination against people with disabilities. The ADA calls for equal employment opportunities, non-discrimination on the basis of having a disability in state and local government services, including public transportation access, providing public accommodations, and telecommunications services.

## **Section 504 of the Rehabilitation Act of 1973**

Section 504 of the Rehabilitation Act of 1973 requires any Executive Agency (including the Department of Transportation (DOT) to ensure that qualified individuals with disabilities are not excluded from or discriminated against by any federally funded program or activity because of their disabilities. Federally funded programs and activities must be accessible and usable to qualified individuals with disabilities, including any aid, benefit, or service. DOT must take proactive steps to ensure events and programs are accessible to persons with disabilities.

## **Section 508 of the Rehabilitation Act of 1973**

Section 508 requires access to information and communication technology (ICT) developed, procured, maintained, or used by federal agencies. Examples of ICT include "Computers and peripheral equipment; information kiosks and transaction machines; telecommunications equipment; customer premises equipment; multifunction office machines; software; applications; Web sites; videos; and electronic documents."<sup>[2]</sup>

### **Executive Order 13175 – Consultation and Coordination with Indian Tribal Governments**

Executive Order 13175 was issued by President Bill Clinton on November 6, 2000, and it charges all executive departments and agencies (agencies) with engaging in regular, meaningful, and robust consultation with Tribal officials in the development of Federal policies that have Tribal implications. Executive Order 13175 also sets forth fundamental principles and policymaking criteria.

The Presidential Memorandum of January 26, 2021 (Tribal Consultation and Strengthening Nation-to-Nation Relationships) issued by President Joe Biden, requires agencies to submit detailed plans of action to implement the policies and directives of Executive Order 13175. In response, all agencies subject to Executive Order 13175 submitted plans of action, including over 50 agencies that submitted a consultation plan of action for the first time. Agencies also conducted more than 90 national-level Tribal consultations, focusing specifically on agency Tribal consultation policies. Subsequently, on November 30, 2022, President Biden issued a Memorandum on Uniform Standards for Tribal Consultation.

# State Requirements

## SB 375

SB 375 (Chapter 728, Sustainable Communities and Climate Protection Act of 2008), adopted in 2008, is a first-of-its-kind law to recognize the critical role of integrated land use planning, housing planning, and regional transportation planning to meet the State's climate goals. By coordinating these efforts, the Legislature envisioned that vehicle congestion and travel can be reduced resulting in a corresponding reduction in emissions. SB 375 directed CARB to set regional targets to reduce GHG emissions for each of the State MPOs on a per capita basis. SB 375 requires that each MPO prepare a Sustainable Communities Strategy (SCS) that will reduce GHG emissions to achieve these regional targets.

SB 375 has three major components:

- ▶ Using the regional transportation planning process to achieve reductions in GHG emissions consistent with AB 32's goals.
- ▶ Offering California Environmental Quality Act (CEQA) incentives to encourage projects that are consistent with a regional plan that achieves emissions reductions.
- ▶ Coordinating the Regional Housing Needs Assessment (RHNA) process with the regional transportation planning process while maintaining local authority over land use decisions.

An SCS is a required component of the RTP. The SCS is a land use pattern for the region which, in combination with transportation policies and programs, strives to reduce emissions and helps meet CARB's targets for the region. An alternative planning strategy (APS) must be prepared if the SCS is unable to reduce emissions and achieve the emissions reduction targets established by CARB. The APS to the SCS shows how the targets would be achieved through alternative development patterns, infrastructure, or additional transportation measures or policies.

SB 375 expressly provides that the SCS does not regulate the use of land and further provides that local land use plans and policies (e.g., general plans) are not required to be consistent with either the RTP or SCS. CARB updated GHG emission reduction targets on March 22, 2018; CARB set reduction targets for the SCAG region at 8 percent for 2020 and 19 percent for 2035 in GHG per capita emissions from light-duty passenger vehicles as compared to 2005. This was an update to the previous 2035 GHG per capita emissions reduction target of 13 percent.

In accordance with SB 375, CARB is required to update the regional GHG emissions reduction targets every eight years for each of the State MPOs with each MPO's timeframe for updating its RTP under federal law until 2050. The next SB 375 targets for MPOs will likely consider the 2022 Scoping Plan adopted by CARB. Pursuant to SB 375, CARB must exchange technical information with the Department of Transportation, MPOs, local governments, and affected air districts and engage in a consultative process with public and private stakeholders prior to updating these targets.

## **AB 52**

AB 52 was approved by Governor Edmund Gerry “Jerry” Brown, Jr. on September 25, 2014. AB 52 applies specifically to projects for which a Notice of Preparation (NOP) or a Notice of Intent to Adopt a Negative Declaration or Mitigated Negative Declaration (MND) will be filed on or after July 1, 2015, pursuant to the California Environmental Quality Act (CEQA). The primary intent of AB 52 was to include California Native American tribes early in the environmental review process and to establish a new category of resources related to Native Americans that require consideration under CEQA, known as tribal cultural resources.

On July 30, 2016, the California Natural Resources Agency adopted the final text for tribal cultural resources update to Appendix G of the CEQA Guidelines, which was approved by the Office of Administrative Law on September 27, 2016.

## **California Environmental Quality Act**

Enacted in 1970, CEQA requires public agencies and local governments to evaluate and disclose the environmental impacts of projects or other major land use decisions, and to limit or avoid those impacts to the extent feasible. The CEQA review process is intended to: (1) inform government decisionmakers and the public about the potential environmental effects of proposed activities; (2) identify the ways that environmental damage can be avoided or significantly reduced; (3) prevent significant, avoidable environmental damage by requiring changes in projects, either by the adoption of alternatives or imposition of mitigation measures; and (4) disclose to the public why a project was approved if that project has significant environmental impacts that cannot be mitigated to a less than significant level. As such, CEQA requires robust public participation and consultation among lead and responsible agencies.

## **Ralph M. Brown Act**

The Brown Act is California’s open meeting law for public agencies. The Brown Act ensures that members of the public remain informed on the views, discussions, and actions of a local agency and allows members of the public to openly comment on agenda and non-agenda items during public meetings.

## Regional Transportation Plan Development Guidelines

The 2024 Regional Transportation Plan Guidelines provides that the development of the Public Participation Plan (PPP) and the RTP/SCS “shall include consultation and coordination with all interested parties and shall, at a minimum, describe explicit procedures, strategies, and desired outcomes (Title 23 CFR Part 450.316).” In summary, the consultation process shall:

1. Provide adequate public notice and the opportunity to comment on proposed RTPs and public participation plans;
2. Employ visualization techniques to describe the RTP;
3. Make the RTP electronically accessible, such as placing it on the Internet;
4. Hold public hearings at convenient and accessible locations and times;
5. Demonstrate explicit consideration and response to public input on the RTP (documentation);
6. Seek out and consider the needs of those traditionally underserved by existing transportation systems, such as low-income households and people of color;
7. Provide additional opportunities to comment on the RTP and the FTIP, if the final version differs significantly due to additional comments;
8. Coordinate with the state transportation planning and public involvement processes; and,
9. Periodically review intended RTP outcomes, products and/or services.<sup>[3]</sup>

## State Transportation Improvement Program Guidelines

The Final 2025 State Transportation Improvement Program (STIP) Guidelines also sets forth public participation requirements. The following is a summary of the different types of amendments identified by SCAG and FHWA for the FTIP and the public participation requirements for each amendment type.

### Category 1. Administrative Modification

An administrative modification as defined under MAP 21, includes minor changes to project cost, schedule, scope, or funding sources. Please see the Procedures for Federal Statewide Transportation Program (FSTIP) Administrative Modifications in Section 1 of this chapter for a complete definition of administrative modifications.

### Category 2. Formal Amendment – Changes that do not impact the existing conformity determination

This category of formal amendments may include project cost changes that are greater than 50 percent of the total project cost or project phase, or \$20 million programmed in the quadrennial, whichever is higher. This amendment may also include adding or deleting projects that are exempt from regional emission analyses.

### Category 3. Formal Amendment – Relying on the existing Conformity Determination

This amendment may include adding a project or a project phase to the program. This amendment category consists of projects that are modeled and are included in the regional emissions analysis.

### Category 4. Formal Amendment – New Conformity Determination

This amendment may include adding or deleting projects that are not currently included in the regional emissions analysis nor part of the existing conformity determination. This amendment may involve adding or deleting projects that must be modeled for their air quality impacts: significantly changing the design concept, scope; or schedule of an existing project. SCAG in consultation, coordination and collaboration with its stakeholders, partners, and interested parties have agreed that the above amendments will be circulated as prescribed in the following table:

PUBLIC HEARING - PUBLIC REVIEW AND COMMENT PERIOD REQUIREMENT		
AMENDMENT CATEGORY	PUBLIC HEARING REQUIREMENT	PUBLIC REVIEW PERIOD NUMBER OF DAYS
Category 1. Administrative Modification	N/A	N/A
Category 2. Formal - Changes that do not impact the existing conformity determination	No	10
Category 3. Formal - Relying on existing conformity determination	No	10
Category 4. Formal - Requires a new conformity determination	Yes	30

## Caltrans MOU

SCAG entered into a memorandum of understanding (MOU) for Comprehensive Federal and State Transportation Planning and Programming on or about July 7, 2017 (note that the parties are currently negotiating an updated MOU). The MOU requires that in accordance with 23 C.F.R. 450.212 and 23 C.F.R. 450.316(b), the MPO planning process shall be conducted in an open manner so members of the public, civic groups, interest groups, businesses and industries, and other agencies can fully participate. Public participation procedures shall be documented, periodically revised, and their effectiveness regularly evaluated. MPO shall take appropriate actions to ensure public participation through such formal means as:

- (a) posting of public hearing agendas,
- (b) appointment of eligible citizen members, where appropriate and allowed, to serve as committee members,
- (c) innovative and creative outreach efforts targeting particularly the traditionally underserved public (e.g., minorities, senior citizens, low income citizens, and Native Americans), and
- (d) creation of standing advisory committees. These committees not composed entirely of citizen members shall post public hearing agencies in accordance with the Brown Act ... when applicable, and all committees shall operate according to their adopted bylaws.

## References

<sup>[1]</sup> See <https://scag.ca.gov/sites/default/files/old/file-attachments/consultationpolicy-tribalgovts-flmas.pdf>.

<sup>[2]</sup> See 36 CFR Part 1194, Appendix A, E103.4; see also <https://www.access-board.gov/ict/>.

<sup>[3]</sup> See 2024 RTP Guidelines at p. 68.



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