



Illinois Department of Transportation

Division of Aeronautics

1 Langhorne Bond Drive / Springfield, Illinois / 62707-8415

DIVISION OF AERONAUTICS CONTEXT SENSITIVE SOLUTIONS (CSS)

SUBJECT: Implementation Procedures

DATE: May 8, 2007

Background:

Public Act 093-0545 (effective January 1, 2004), provides that the Illinois Department of Transportation “. . . shall embrace principles of context sensitive design and context sensitive solutions in its policies and procedures for the planning, design, construction, and operation of its projects for new construction, reconstruction, or major expansion of existing transportation facilities.” This is to ensure that the Department’s projects “. . . adequately meet the State’s transportation needs, exist in harmony with their surroundings, and add lasting value to the communities they serve.” Departmental Policy D&E 21, issued on August 1, 2005, formalized Context Sensitive Solutions (CSS) as the official policy of the Department for projects utilizing CSS principles.

Basic Principles of CSS

CSS is an approach that utilizes various methods to achieve a common overall goal--plan and design transportation projects that “fit” into their surroundings, or their context.

The CSS process seeks to:

- Balance cost, safety, mobility, community needs, and the environment.
- Involve stakeholders in the decision-making process early and continuously throughout the development of the project.
- Address all appropriate modes of transportation in the plan and design of the project, including motor vehicle, mass transit, pedestrians and bicyclists.
- Use all appropriate disciplines to help plan for and design the project.
- Apply the flexibility inherent in the design standards to fit the project into its surroundings.
- Incorporate aesthetics as part of basic “good design.”

Definition of CSS

CSS is an interdisciplinary approach that seeks effective, multimodal transportation solutions by working with stakeholders to develop, build and maintain cost-effective transportation facilities which fit into and reflect the project's surroundings, or its "context." Through early, frequent, and meaningful communication with stakeholders and a flexible and creative approach to design, the resulting projects should improve safety and mobility for the traveling public, while seeking to preserve and enhance the scenic, economic, historic, and natural qualities of the settings through which they pass.

The Stakeholder

The CSS approach encourages transportation agencies to proactively involve stakeholders in the planning and design of the project. A "stakeholder" is defined as any person or organization that has a direct interest in the project being considered.

Depending on the location and project in question, the number and type of stakeholders can vary substantially. In large projects with literally thousands of stakeholders, it is especially important for the transportation agency to have a systematic method of reaching out. This ensures that representatives of all the possible individual stakeholders can be organized and can communicate clearly with the agency.

Federal Involvement in CSS

The United States Department of Transportation, through the Federal Highway Administration (FHWA), encourages states to adopt the CSS approach to surface transportation planning and design. The FHWA has been an active partner with IDOT in developing the state's guidelines and policies. FHWA also maintains a presence on IDOT's internal CSS oversight committee and has provided input on policy development.

The Federal Aviation Administration (FAA) has not formally adopted CSS in the planning, design, or construction of airport projects and as such has no guidance for its application. However, the FAA's general practices have historically incorporated many of the philosophies of CSS.

CSS at the Division of Aeronautics

Utilization of CSS practices at Aeronautics will vary from that of any other Division or Office within IDOT. The procedures and operational characteristics of the Division of Aeronautics are unique to the Department and differ from the other Divisions in several distinct and significant ways:

Airport Ownership

The Illinois Department of Transportation does not own or operate any of the publicly owned, open to the public airports in Illinois. Local airport sponsors are the owners and operators of each publicly owned, open to the public airport in Illinois. Sponsors are in the form of municipal corporations and may be cities, counties, airport authorities, park districts, port authorities, universities, etc.

Airport Funding

The Division of Aeronautics receives FAA grants and is subject to grant assurances set forth by the FAA. The Division does not receive FHWA funding. The FAA requires the Division and local airport sponsors to adhere to these assurances, thereby ensuring compliance with applicable FAA regulations. Acceptance and distribution of federal grants is contingent upon strict compliance to these assurances. The Division assists the FAA in requiring airport sponsors to plan, design, construct, and maintain airport facilities in accordance with applicable federal and state design and safety criteria. The Division will work with local stakeholders consistent with CSS policy to ensure that relevant community-based input is received and incorporated as appropriate into projects affecting their communities and regions. However, it is important to recognize that additional improvements or modifications resulting from the CSS process may not be eligible for state or FAA funding.

Airport Project Formulation

The Division of Aeronautics accepts proposed projects from local airport sponsors through a series of annual Transportation Improvement Program (TIP) meetings. At these meetings, local airport sponsors submit a list of desired projects to the Division. The Division ranks eligible projects based on a federal priority system and determines which projects will be placed in the current program. Because the number and cost of projects requested typically exceed the level of federal and state funding available, only a small percentage of the requests can be funded during any given year.

The Division will encourage local sponsors to adopt the CSS approach for projects identified as CSS candidates, assuming they meet federal and state design and safety criteria and are eligible for state and/or federal funding.

It is important to understand that aesthetic improvements often seen in highway construction may not be suitable for airport environments. Certain kinds of "beautification" features such as reconstructed prairie grassland or open water, if placed on or adjacent to airport property, would constitute a hazardous wildlife attractant. This could pose a hazard to air navigation, place the airport in non-compliance, and most important, compromise the safety of the flying public. Within these constraints on qualifying projects, the Division will consider the positive aspects of good aesthetic design compatible with airport safety.

Implementation Guidelines & Practices for Aeronautics

In accordance with Illinois law, procedural rules, and applicable federal guidelines, the Illinois Department of Transportation develops and oversees standards and procedures for CSS implementation. The Division of Aeronautics shall maintain compliance with the FAA's standards for grant distribution, acceptance, and utilization. Should CSS guidelines conflict with FAA grant assurances or regulations, compliance with FAA regulations shall take precedence.

General Successful Practices

The Division strives for an open and honest working relationship with the stakeholders on all projects. The basic principles and successful practices of CSS should be incorporated into Illinois airport projects as appropriate. The Division shall encourage the use of CSS practices by local airport sponsors from the conception through the construction of a project. The Division takes a proactive role in coordinating and meeting with stakeholders whether or not a project is identified as a CSS project. The Division co-sponsors an annual conference for airports and industry personnel, distributes a regular newsletter to all Illinois pilots, airports, and other interested persons and organizations in Illinois and elsewhere, organizes various safety seminars throughout the state, maintains safety, reference, and contact information on its website, holds public hearings and/or early coordination meetings for airport developments, and facilitates annual meetings with airport sponsors. In addition to these public outreach activities, the Division will strive to devise and implement improved ways in which to communicate with stakeholders and solicit input regarding airport development.

Project-Specific Successful Practices

The following shall be pursued as appropriate for specific projects at the Division of Aeronautics:

At the time a project is proposed, the Division shall review the project's general scope and make a determination as to whether or not the project is a good candidate for the CSS process. Current applicable IDOT CSS policies and guidelines shall serve as direction on which to base this recommendation. The Director of the Division shall determine which projects will formally utilize CSS as they are included in the airport program.

Throughout the planning, design, construction, and implementation of a project, the Division shall encourage the use of CSS practices consistent with current IDOT CSS policies and guidelines.

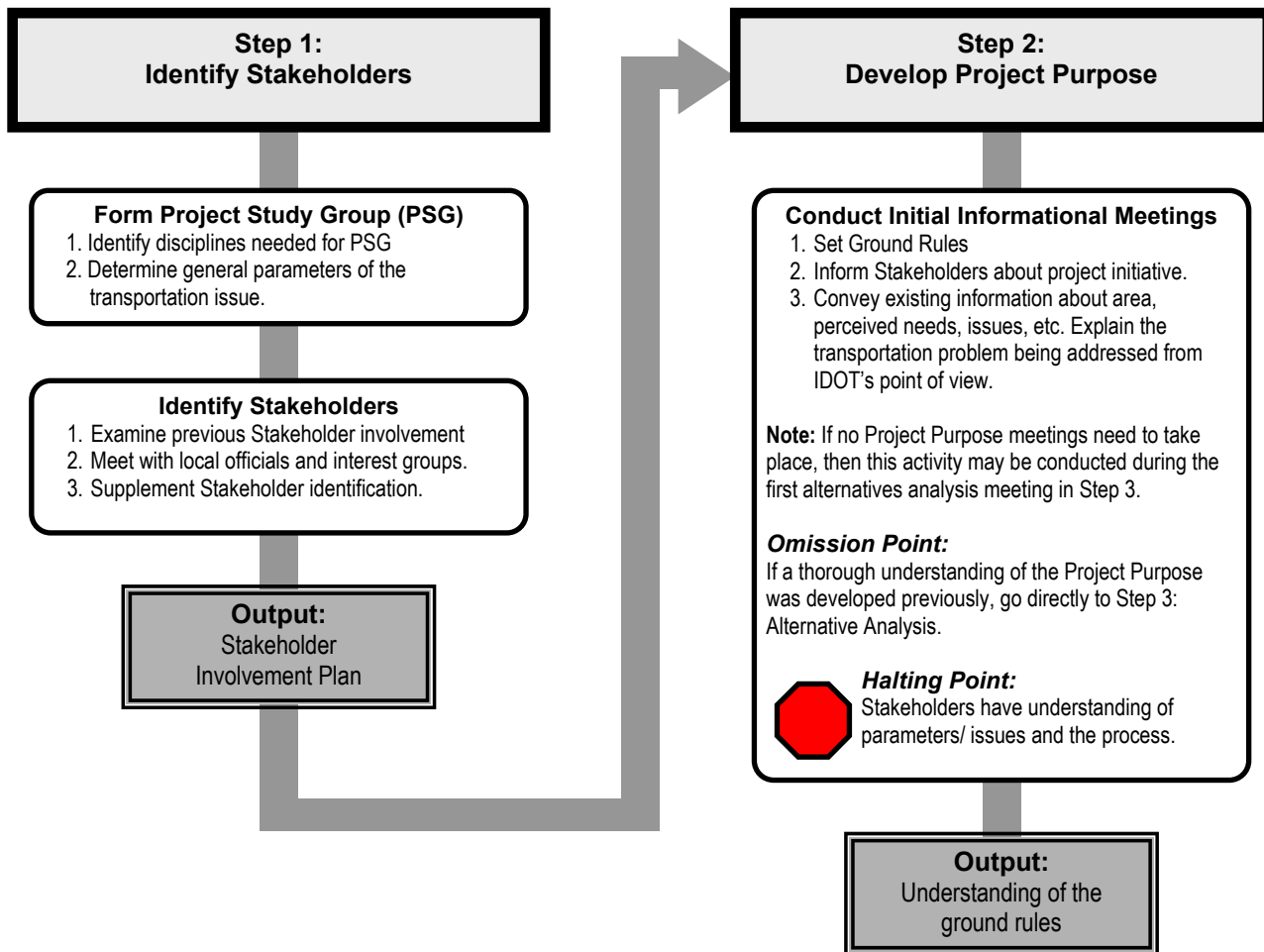
Stakeholder Involvement

Stakeholder involvement at the Division of Aeronautics is inherent in the way projects are conceived, planned, programmed, designed, constructed and

implemented. CSS guidelines will enhance stakeholder involvement for eligible projects. Through federal and state rules and processes, stakeholder participation is integrated from inception to completion of a project. When the decision is made that a project will formally adopt the CSS approach, the Director will order applicable stakeholder involvement guidelines to commence immediately.

The Division maintains an “open door policy,” willing to facilitate meetings with any and all concerned parties to discuss proposed improvements or developments in accordance with applicable rules. Additionally, the local airport sponsor provides a continuous on-site presence and affords a unique opportunity for sustained stakeholder involvement. This allows the Division to better discern a region’s needs and expectations. The Division shall ensure that proposals meet federal and state design and safety criteria and are in the best interest of the safety of the flying public. The Division will accept and consider all viable requests received through the CSS process and will continue to be proactive in educating and communicating with the general public and other stakeholders about applicable rules and guidelines.

Stakeholder Involvement Process



Continued from previous page

Conduct Project Purpose Development Meetings

1. Conduct context review with Stakeholders.
2. Solicit Stakeholders' views of existing/potential transportation in the affected area.
3. Develop an understanding of the kinds of transportation problems that can be solved with the project (within its engineering, funding, etc.).



Halting Point:

An Understanding is reached on Project Purpose

Output:

Understanding of Project Purpose

**Step 3:
Analyze Alternatives and Choose Preferred Alternative**

Conduct Alternatives Meetings

1. Develop a set of alternative courses of action for the project.

Staff re-presents modified alternatives based on previous input

1. Discussion of issues surrounding these alternatives.
2. If TAGs have been formed, the meetings will be with the TAGs.

Omission Point:

If previous input did not identify major deviations from alternatives developed by staff, there is no need to re-present modifications

Staff presents alternatives based on Project Purpose

1. Staff elicits input from Stakeholders on alternatives.
2. (After meeting(s)) Staff evaluates input on alternatives and refines the initial presentations.
3. Form Technical Advisory Groups (TAG)

Omission Point:

For smaller or less complex projects, specific TAGs are usually not needed. If the number of Stakeholders or likely number of meetings is small, omit the formation of TAGs.

Alternatives elimination meetings

1. Staff presents alternatives and discusses their features.
2. Alternatives eliminated throughout the process.
3. If TAGs have been formed, the meetings will be with the TAGs.

These meetings should reiterate until a general consensus forms around the preferred alternative.



Halting Point:

A preferred alternative is identified.

Output:

A single design for the project

**Step 4:
Approval of Final Alternative**

Full Stakeholder Meeting

1. Approve the Parameters of the consensus design.

Output:

Preferred Alternative

Stakeholder Involvement Plan

A Stakeholder Involvement Plan is a key component to the success of CSS principles on a project. The Stakeholder Involvement Plan by its very nature is a work in progress and thus subject to revision anytime events warrant.

Major goals and objectives are as follows:

- Identify all stakeholders of the project and ensure their opportunity for meaningful input into the project's development from beginning to end.
- Determine the project context with stakeholders input and concurrence.
- Identify issues that can and should be solved by the project with stakeholder input and concurrence.
- Identify reasonable alternative solutions to solve identified issues with stakeholder input and concurrence.
- Treat all involved parties with respect and dignity, in a transparent manner, and in a way that ensures their input was duly heard and considered.

The Stakeholder Involvement Process will facilitate effective identification and understanding of the concerns of all stakeholders as an integral part of the project development process. The purpose is to promote a CSS approach that proactively seeks the input of the full range of concerned stakeholders early and often and that provides for the appropriate consideration of stakeholder input at key points in the project decision making process.

Involvement and coordination activities associated with the planning and environmental processes should be viewed as an integral part of the stakeholder involvement process. The timing of the stakeholder involvement process activities should accommodate and coordinate with key milestones in the planning and environmental processes. Results of meetings with state and federal regulatory and resource agencies should be part of the iterative process for achieving stakeholder consensus on a project.

Project Study Group

The Project Study Group is the multidisciplinary team which will develop the project. In addition to appropriate division, airport, and consultant staff, the group may include representatives from other offices/agencies as appropriate. Once planning is started, other disciplines can be added to the Project Study Group or consulted as necessary to respond to issues involved with the project and to promote identification and evaluation of the full range of possible project options. The disciplines to be included or consulted should be determined early in the process.

Step 1: Stakeholder Identification

The Project Study Group should research correspondence and other information leading to the initiation of the project and start making a list of

potential stakeholders (individuals, organizations, agencies, etc. that are on record as supporting or opposing a proposed improvement to address the transportation issue). This initial stakeholder list should be maintained and updated and should expand as the project proceeds.

A comprehensive list should be created that includes concerned citizens, public officials, organizations, agencies and others who want to be involved or informed on transportation issues in the area. The Division should determine from this list the possible stakeholders that may desire to be actively involved in the planning and environmental process. Those parties shall become the stakeholders for the project. The stakeholder list will be expanded as information is gathered from contacts or meetings with local officials, affected property owners, state and federal regulatory and resource agencies, the flying public, special interest groups, etc. Throughout the process, the contact lists should be updated to include all citizens who have had a contact with the study team, whether by attending a meeting, calling in, leaving a comment on-line, or sending in a letter.

A Stakeholder Involvement Plan should be developed that identifies who the stakeholders are, how they are to be reached, and a tentative schedule of meetings. This plan need not be extremely detailed and should be modified as the process develops. The plan should not be time or date driven but rather linked to milestones or decision points that occur throughout the course of a project. The Stakeholder Involvement Plan should also contain the tentative ground rules under which it will be conducted.

Following is a general list of potential stakeholders for a given Airport Improvement Project. Because each airport and project is unique, not all of the following will apply to every situation. There may be additional stakeholders not mentioned below:

Local Airport Sponsor	Multi-Modal Interaction
Affected Businesses	Roadways
Airlines	Railways
Air Taxi Corporations	Waterways
Corporate Users	Bicycle/Pedestrian Paths
Airport Users	Military Installations or Interests
With Based Aircraft	Elected Officials
Without Based Aircraft	Federal Aviation Administration
Airport Tenants	Agency Personnel Off-Site
Aviation Related	Agency Personnel On-Site
Non-Aviation Related	
Off-Field Aviation Related	
Businesses	
Off-Field Non-Aviation Related	Local/County/State/Federal
Businesses	Transportation Agencies

Flying Public (Based & Itinerant) General Aviation Pilots Corporate Pilots Commercial Pilots General Public Utilizing Air Transit	Other Local/County/State/Federal Resource and Regulatory Agencies Local Metropolitan Planning Organizations
Land Owners Adjacent Property Intermediate Distant	Other Interested Public and Private Entities

Achieving Stakeholder Involvement

Stakeholder involvement can be achieved through a variety of methods. There are many types of meetings and activities that can be used to support a stakeholder meeting. It is important to reach a wide variety of stakeholders during the planning and design process and to create an atmosphere that encourages the free and open exchange of information. Following are brief descriptions of several stakeholder involvement methods:

- **Group briefings** are informal meetings with stakeholders. They can be very effective for circulating information on various issues and gaining valuable input.
- **Open houses** are held in the immediate area of the project and provide an informal setting for the public to meet and interact with Department representatives on project issues in a format that offers considerable flexibility for interested persons to attend when it fits their schedule.
- **Workshops** are meetings where participants are given basic project requirements and various constraints and are then asked to study the issue and suggest a solution. In a workshop format, participants are requested to analyze the provided information, identify impacts that may have been overlooked, work with other participants, and offer solutions and explanations of their suggestions.
- **Informational meetings** are informal public gatherings that blend the opportunity for individual discussions, as occurs at open houses, with more structured group interaction through project presentations and question and answer sessions.
- **Advisory committees** identify key stakeholders and organize them into a community resource council as an advisory group to the study team. They provide input and response and serve to focus the views, concerns, and values of the communities.
- **Technical Advisory Groups** are a specific and structured form of advisory committee. They are assembled to review specific planning and design materials and advise the study team at key milestones before the information is finalized.

- **Elected officials meetings** basically serve to brief the elected officials on the issues at hand and solicit input from them. Elected officials represent a variety of constituents and, therefore, provide a unique perspective into the issues being discussed.
- **Interest group meetings** target a wide variety of groups, such as service clubs, city councils, county boards, chambers of commerce, homeowners associations, local and regional planning agencies, farm bureaus, state officials, environmental organizations, minority organizations, etc. These groups provide a unique perspective into the issues being discussed.
- **Focus groups** are a tool to gauge public opinion. They provide for small group discussion with professional leadership that is intended to solicit sample opinions on a single topic involving a few specific questions. The emphasis is on gathering perspectives, insights, and opinions of participants through conversation and interaction.
- **Public Opinion Surveys** can also be used to scientifically gauge public opinion once the focus groups have identified the major issues and a range of opinions and solutions to transportation issues has been solicited.
- **Charrettes** are meetings to resolve a specific issue. Within a specified time limit, participants work together intensely to reach resolution. A leader is used to bring out all points of view from the various stakeholders and participants.
- **Speakers (or Listeners)** bureaus are groups of specially trained representatives who can speak about a process or a program. They can be community members or staff. They meet with public and private organizations and provide information, listen to concerns, answer questions, and seek continued participation and input.
- **Newsletters** can be issued regularly throughout the project development process to announce new developments, upcoming public involvement opportunities, and the results of involvement activities.
- **Information hotlines and websites** can be used to provide a way for interested citizens to gain information from the study team, get questions answered, and provide input and feedback.

It should be made clear that the intent of the above activities is to provide a forum for discussion and comment on various project-related issues, not to immediately produce final decisions.

Prompt and open follow-up on issues raised during these meetings is necessary. The appropriate type of follow-up will partially depend on public or stakeholder attitudes at the public involvement activity. If the public has been generally supportive of the material presented at the meeting, it is probably not necessary to initiate a large-scale follow-up. It may suffice to contact those who asked questions which were not answered and to release information via project newsletters, through updates on the project website, or through news media describing any changes that were made as a result of stakeholder input.

A greater amount of follow-up is required when a particular meeting has not resolved the issues to a reasonable degree. Opposition or a lack of understanding regarding the project's goals compels a more extensive follow-up program. Additional stakeholder meetings are an effective means of achieving better stakeholder understanding of issues at hand. These meetings can range from large-scale community briefings to one-on-one discussions with a particular stakeholder or other interested party.

Step 2: Project Purpose/Defining the Issue

Developing the project purpose is the first, fundamental step in the overall project development process. Central to this concept is the understanding by all stakeholders that a transportation issue has been identified, and the Department is committing resources to address that issue. Outreach should be focused on understanding community viewpoints regarding the proposed project. The purpose of this outreach is to ensure congruence between the Division's/sponsor's assessment of the issue(s) to be addressed and those recognized by regional stakeholders. A clear understanding between stakeholders and the Division regarding a need, including what issues are to be addressed, is needed for progress toward solving the issue.

The first general contact with stakeholders should introduce the purpose and need for the project, exchange information, and identify concerns. This contact starts the process of coordinating with the public so they can begin to understand that their involvement is vital to the development of the project.

The Project Study Group should meet with the stakeholders to explain the ground rules under which stakeholder involvement will be conducted. What is the code of conduct for the group? What are the purpose and goals of the process? What will be the method of decision making? What are the accountabilities of the participants? How is consensus defined? How will transparency of the process be ensured? All these questions must be addressed by explicit ground rules and agreed upon by the stakeholders.

Once ground rules are established and accepted by the stakeholders, the Project Study Group should present its vision of the transportation issue or issues to be solved and the preliminary proposed solutions resulting from the scoping process. It is also helpful at that time to explain departmental procedures for choosing and developing projects.

The Project Study Group should meet with the stakeholders to develop a clear statement of the transportation purpose and need. The Project Study Group should seek input on current issues in the area the stakeholders believe need to be solved and how the project as preliminarily proposed might help improve them. If stakeholder solutions are suggested that are technically or financially infeasible, the Project Study Group should determine the underlying problems the suggestions were attempting to solve and whether or not there is a feasible way to address them within the project's anticipated scope.

This input should be translated into a clear statement of the issues which should be solved by the project. The stakeholders must understand that the issues within the statement are not guaranteed to be addressed by the project. Stakeholders should be reminded that the project's ultimate scope will be finalized at a later time and is subject to state and federal regulatory and resource agencies final concurrence and approval. State and federal regulatory authorities and resource agencies of record should be represented among the stakeholder groups for CSS projects.

Step 3: Defining Alternatives

Development of project alternatives is a critical step for the development of any project. Stakeholder input can add considerable value to the formation of viable alternatives. Options and concerns identified by the stakeholders in Step 2 should be considered during this process.

On larger and more complex projects, this is usually the appropriate time to form one or more Technical Advisory Groups (TAG). These groups are composed of stakeholders who volunteer to be in ongoing contact with the Project Study Group - over and above the full public meetings - and who actively participate in analyzing the generated alternatives. For larger and more complex projects, several groups may be created, each responsible for analyzing the alternatives according to a particular subject matter (airspace, noise, economic development, aesthetics, etc.). For smaller and less complex projects, a single group handling all relevant subjects may be most appropriate.

For all but the smallest or least complex projects, several meetings for analyzing alternatives are likely to be necessary. The purpose of follow-up "alternative analysis" meetings is to present the refined alternatives generated from the first round of meetings and to begin to reduce the number of alternatives carried forward. Concerns from previous meetings, along with any current conflict resolution results, should be discussed. If concerns cannot be incorporated, staff must indicate why and attempt to offer solutions that address the issues underlying these concerns.

Technical Advisory Groups, if formed, would continue their analysis of the refined alternatives and assist in presenting the results at full stakeholder meetings. Generally, full public meetings during this stage should only happen if a new issue emerges or an issue not previously considered relevant becomes important. For large or complex projects, there may be a need for several rounds of stakeholder meetings for refining and reducing the number of alternatives.

Step 4: Approval of Final Alternative

This is the last stakeholder involvement activity during planning. Its intent is to finalize the consensus with the public. In order to have reached this point, all reasonable concerns should have been addressed and all serious conflicts resolved - and the preferred alternative should reflect that. Staff should

carefully determine whether issues remain unresolved or unidentified. If staff does not feel that the process has reached such a point, outstanding issues should be addressed before scheduling this final meeting. Again, the public should be reminded that the preferred alternative is subject to review and approval of state and federal regulatory and resource agencies.

Special Consideration: Stakeholder Understanding/Consensus Building

Project purpose discussions involving the community should focus on providing the community with background on known issues. These help explain the Division's perspective on issues and needs and set the stage for discussions about potential solutions. Staff should take advantage of any and all methods and opportunities to interact with public officials, identified stakeholders, and any other concerned citizens. Efforts should focus on gathering data, developing a rapport and good working relationship with the local community, and obtaining a sense of what solutions best fit the context of the community.

It should be noted that more than one of the meeting types listed in Step 1 above may need to be used and may require repetition, depending on several factors, including:

- the number of stakeholders or stakeholder groups involved;
- the scope of the issues discussed; and
- the positions and views of the stakeholders on the various issues.

Keep in mind the "halting points" outlined in the stakeholder involvement process flowchart may be reached if a consensus has been achieved. If a consensus resolution of the issues has not been achieved, further meetings are probably necessary. Staff may find this frustrating or time consuming, and many elected officials may feel this at an even stronger level. However, issues raised by stakeholders do not go away if left unaddressed. Often relatively minor problems can become major impediments to progress if ignored or left unattended.

Throughout the stakeholder involvement process, staff should seek out activists and other participants with differing viewpoints from the team members and engage in good faith discussions with them. An important component of conflict resolution is full disclosure of all information and discussions needed to manage and resolve conflicting values of stakeholders. When parties disagree, it is sometimes due to a misunderstanding or lack of information. It is important that all parties disclose relevant information to resolve or at least manage conflict between competing values.

An essential component of the stakeholder involvement process is the concept of "consensus." Consensus occurs when a majority of the stakeholders agree on a particular issue, while the dissenting remainder of stakeholders agrees their input has been heard and duly considered and that the process as a whole was fair. The Stakeholder Involvement Process seeks consensus on all decisions driving the project planning process and allows for multiple iterations

of each step in order to achieve it. However, there may be occasions on which consensus on one or more issues is impossible. Additionally, there may be occasions on which the consensus decision of stakeholders is not feasible on the grounds on engineering, environmental, funding, operational, safety, or other grounds. If consensus is impossible or not feasible, the Project Study Group should take the issue back to the Director of the Division of Aeronautics and the airport sponsor to determine how to proceed with the project. Ultimately, the Division and the airport sponsor are responsible for project development decisions.