

I-10: I-17 (Split) to SR 202 L (Santan Freeway) Environmental Assessment

Limited English Proficiency Four-Factor Analysis Summary

August 2019

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Introduction

The Arizona Department of Transportation (ADOT), in partnership with the Federal Highway Administration (FHWA) and the Maricopa Association of Governments (MAG) is entering the final phases of studying and designing improvements to Interstate 10 (I-10) between I-17 and SR 202L. The final phases of this project are obtaining environmental clearance, conducting a design/build procurement, and design and construction. Proposed improvements include substantial modifications to the I-10/SR 143/Broadway Road connections and the I-10/US 60 connection, additional general purpose (GP) and high occupancy vehicle (HOV) lanes, the addition of a collector/distributor (CD) roads system, drainage improvements, bridge construction, traffic improvements, Intelligent Transportation Systems (ITS) facilities, retaining and sound walls, pedestrian bridge crossings, new right-of-way and utility relocations.

To obtain final environmental clearance, ADOT will complete an Environmental Assessment guided by the National Environmental Policy Act of 1969 (NEPA) and federal and state environmental process requirements. Following the assessment of proposed alternatives, and after public comments are received and considered, a determination of the significance of the impacts will be made. If no significant impacts associated with the proposed improvements are identified, the project will receive a Finding of No Significant Impact (FONSI) from FHWA.

ADOT's public involvement programs will strive to be innovative and proactive in engaging individuals from different cultures and backgrounds in the project-development process. Key guidelines for ensuring success in this regard include Title VI of the Civil Rights Act of 1964 and Environmental Justice, and the Americans with Disabilities Act of 1990. Additionally, ADOT will identify and engage impacted Limited English Proficiency (LEP) persons early and throughout the life of the project. LEP is a term used to describe individuals who are not proficient in the English language.

The project will affect many stakeholders that have varying levels of English proficiency. To ensure all people who want to learn about and engage with the project have an opportunity to do so, and in compliance with Title VI and Executive Order 13166, a Limited English Proficiency Four-Factor Analysis was performed in October 2018. The results of the analysis are summarized in this document.

Limited English Proficiency Four-Factor Analysis Overview

The four factors that are analyzed in a Four-Factor Analysis are:

- The number and proportion of LEP persons in the Service Area of the cities of Phoenix, Tempe and Chandler, and the Town of Guadalupe.
- The frequency with which LEP persons are likely to interact with the Project
- The importance of program services/activities to the LEP persons
- The resources available and costs of materials and services needed to provide language assistance

Factor 1 – Number and Proportion of LEP Individuals in the Service Area

The project area lies within the Cities of Phoenix, Tempe and Chandler, and the Town of Guadalupe, in Maricopa County. Stakeholders for the project comprise individuals who live and work within these cities, those who travel through the area, and those who may do neither of the preceding but have an interest in the roadways associated with the project (for example, special interest groups). The designed Service Area in which the analysis was conducted is inclusive of the cities of Phoenix, Tempe and Chandler, and the Town of Guadalupe, in Maricopa County, Arizona.



Figure 1 - Study Area

Factor 1 – The number and proportion of LEP persons in the Service Area

Per the U.S. Census Bureau 2011-2015 American Community Survey 5-Year Estimates, each city has individuals who report speaking English “less than very well”. The languages that meet the Safe Harbor Threshold of five percent (5%) or 1,000 persons, whichever is less, of the total population of persons eligible to be served or likely to be affected or encountered, by the program/activity are shown in Figure 2 – Languages by City.

City	Language(s)	Total Non-LEP Population	LEP Individuals	Percentage
Phoenix	Spanish	1,400,199	164,656	12%
Tempe	Spanish	162,124	6,442	4% (1,000)
	Chinese		1,913	1% (1,000)
Chandler	Spanish	393,222	13,845	4% (1,000)
	Chinese		2,638	1% (1,000)
	Korean		1,159	<1% (1,000)
	Vietnamese		1,749	<1% (1,000)
Guadalupe	Spanish	5,543	2,817	51%

Outreach efforts to targeted populations in the Service Area usually relates to infrastructure, transportation, water, elections, health, and other topics. Notifications often include Spanish translation or a line of text alerting the reader that materials in an alternate language or format are available upon request.

An analysis of the policies and common practices of key community organizations, such as Compadre Academy, Tempe Unified School District, and Guadalupe Family Health Center, Town of Guadalupe staff, City of Tempe, and City of Phoenix staff have employed various language assistance measures. Individuals from these organizations were interviewed and asked questions, such as:

- What languages do the people you serve speak/read/write?
- What is your organization’s policy on translating or providing interpretation for people you serve?
- What language assistance measures do you use?
- Do members of your service population sometimes identify as English speakers but seem to prefer to use a different language to discuss matters of special importance?

Interviewees indicated they serve populations that speak English and Spanish. Tempe Union School District indicated they have one school at which families speak many languages but each language other than Spanish represents a small percentage of the school’s families. Each organization has the policy of providing Spanish interpretation on an as needed basis. Some of the organizations regularly provide printed materials in Spanish,

as well. The City of Phoenix has a policy in which a line is included in many notifications that declares that materials may be provided in alternate formats/languages upon request.

Other language assistance measures employed by the interviewee organizations have included:

- Website translation functionality
- Interpreters at meetings
- Interpretation hotline
- Translated documents
- Translated signage
- Translated phone messaging
- School English language learning (ELL) courses

Factor 2 – Frequency of Community Member Interaction with Project

Because the Project's focus is an interstate freeway within a densely populated area in the Metropolitan Phoenix region, the likelihood and frequency that LEP persons will interact with the Project is high. The roadway is a key facility for commuters that has been in operation as an interstate highway for more than 50 years. The fact that the facility is an integral part of the transportation system in Arizona and the Western United States raises the likelihood and frequency with which community members may interact with the Project. Based on previous discussions with stakeholders in the area, community members within the area are accustomed to roadway projects and largely accept them as part of living within a growing urban area. This may lessen the likelihood and frequency of interaction.

Factor 3 - Importance of Program Services/Activities to LEP Persons

The Project and its resulting highway improvements will provide direct benefits to all members of the community and region; therefore, the Project is of significant importance to community members. ADOT has conducted numerous Projects within the region and the Project Area. Community members who choose to engage with the Project will likely do so for the purpose of learning about the transportation improvements and how the construction phase may affect road operations, property access, and transit routes and schedules.

Factor 4 – Resources Available and Costs

ADOT has employed a suite of language assistance measures in previous projects within the area. Interpreters and translators are available and can be employed to provide assistance at meetings, telephonically, and during development of written materials. ADOT commonly uses graphics to enhance messages, including use of alternate formats, visualizations, and videos. The costs of the services and materials needed to provide language assistance have been incorporated into the budget for the study phase of the project. In some cases, content that will be used during this phase have previously been translated. Wherever possible, that content will be reused and/or adapted in to manage costs.

Summary

The LEP Four-Factor Analysis indicates: LEP persons comprise more than 5% or 1,000 of the population within the cities of Phoenix, Tempe and Chandler, and the Town of Guadalupe; there is a moderate to high likelihood that LEP persons will engage with the project; the project and its resulting highway improvements will provide direct benefits to LEP persons; and materials and services needed to provide language assistance are attainable from availability and cost standpoints. Due to these results, ADOT will provide the following for this project:

- Develop contacts, mailing lists, and other means to initiate and continue communication.
- Include Title VI language on all advertisements for the public and add a line of Chinese, Korean and Vietnamese text indicating language assistance is available.
- Provide Title VI brochures, posters and the voluntary Self Identification Survey cards in both English and Spanish (or other languages as identified) at all public events hosted by ADOT.
- With reasonable advanced notice, provide requested interpretation services at all public meetings.
- Provide digital and printed materials in the LEP language(s) of the identified LEP group(s).
- Use visual images or simulation videos, especially at public meetings, when feasible.