

Public Involvement Plan

Interstate 40/US 93 System Traffic Interchange Study

ADOT Project No. H7993 | Federal Project No. NHPP-040-A(212)N

April 2020

Table of Contents

1. INTRODUCTION TO INTERSTATE 40/US 93 SYSTEM TRAFFIC INTERCHANGE PUBLIC INVOLVEMENT PLAN	4
1.1. Study Description	4
1.2. Purpose and Goals for Public Involvement	5
2. PUBLIC INVOLVEMENT ROLES AND RESPONSIBILITIES	6
3. STAKEHOLDER ASSESSMENT	7
3.1. Title VI, Environmental Justice (EJ) and Limited English Proficiency (LEP) Evaluation	7
3.2. Community Assessment	8
4. PUBLIC INVOLVEMENT TOOLS AND TECHNIQUES	10
5. PUBLIC HEARING	11
5.1. Public Hearing Planning	11
5.2. Hearing Format	11
5.3. Hearing Location	12
5.4. Hearing Room Layout	12
5.5. Virtual Public Hearing	12
5.6. Hearing Time and Date	14
5.7. Public Hearing Notification	15
5.8. Public Hearing Staffing	16
5.9. Public Hearing Staff Briefings	17
6. PUBLIC INVOLVEMENT DOCUMENTATION	17
6.1. Public Involvement Summary	17
6.2. Managing Public Comments	18

List of Figures

- Figure 1: Study Area Map
Figure 2: Demographic Analysis Area Map

Appendices:

- Appendix A Requirements for Public Involvement (Guiding Regulations)
Appendix B Data Sets for Community Assessments and Limited English Proficiency Evaluation – Four Factor Analysis
Appendix C Roles and Responsibilities Matrix

List of Acronyms

ADA	Americans with Disabilities Act
ADOT	Arizona Department of Transportation
CFR	Code of Federal Regulations
CRO	Civil Rights Office
DOT	Department of Transportation
EA	Environmental Assessment
EJ	Environmental Justice
FHWA	Federal Highway Administration
FTA	Federal Transit Authority
LEP	Limited English Proficiency
WACOG	Western Arizona Council of Governments
MP	Milepost
NEPA	National Environmental Policy Act
PIP	Public Involvement Plan
PM	Project Manager
SR	State Route
TI	Traffic Interchange
US	United States
USPS	United States Postal Service

1. INTRODUCTION TO US 93/INTERSTATE 40 SYSTEM TRAFFIC INTERCHANGE PUBLIC INVOLVEMENT PLAN

1.1. Study Description

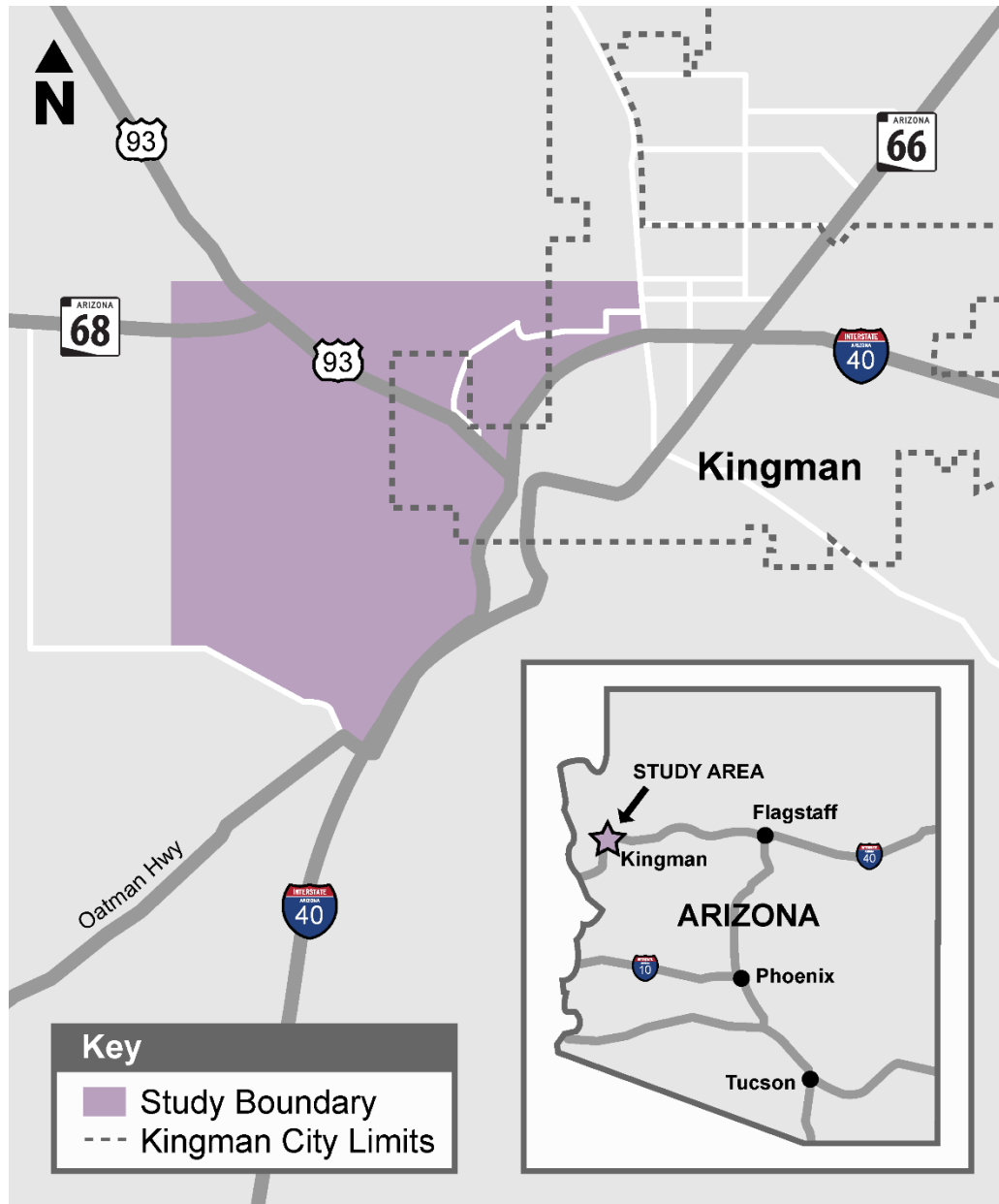
The Arizona Department of Transportation (ADOT) and the Federal Highway Administration (FHWA), in coordination with the Bureau of Land Management (BLM) are conducting an Environmental Assessment (EA) and developing a preliminary design concept for the US 93/Interstate 40 (I-40) System Traffic Interchange (TI). The study began in 2007 to identify a preferred alternative for improving traffic flow at the I-40/US 93 TI in west Kingman. Alternatives for a new TI location were identified and evaluated to provide for a free-flow connection between I-40 and US 93. The study concluded in 2013 with a Preferred Alignment recommendation, which is included in the Final Feasibility Report, available on the study website at <https://azdot.gov/WestKingmanTI>.

The general location for the various alternative corridors is along I-40 between the Shinarump Drive TI and the Stockton Hill Road TI and along US 93 between the SR 68 TI, near the Port of Entry, and the existing Beale Street interchange, where US 93 connects with I-40.

The Draft EA and preliminary design concept will consider and assess the alignment alternatives, including a no-build alternative¹. Issues to be analyzed in depth in the EA and preliminary design concept will include the proposed project's impacts on cultural resources, biological resources, water quality, recreational resources, noise impacts and air quality; as well as other social, economic, and environmental impacts.

¹ *No build alternative – assumes no improvements to the study area. This alternative typically serves as a benchmark against which the impacts of the other alternatives can be compared.*

Figure 1: Study Area Map



1.2. Purpose and Goals for Public Involvement

This Public Involvement Plan (PIP) has been developed to guide collaboration, consultation, and information sharing with the community to engage stakeholders in the public hearing process for the I-40/US93 System TI Draft EA and preliminary design concept. Public involvement for this study will be executed in compliance with the requirements for public involvement per guiding regulations found in Appendix A.

To accomplish the goals for public involvement, the public involvement team will:

- Engage stakeholders to help ensure the Study team² incorporates agency and public input into the Draft EA and preliminary design concept.
- Provide clear and accurate information to encourage informed public participation and feedback.
- Provide multiple, convenient ways for interested parties to provide comment.
- Provide multiple means through which the public can learn about the project.

Stakeholder Influence, Authority, and Public Involvement Goals

Stakeholders for this study have been identified as any person or group who may be interested in or affected by the study and the recommended alternative. Within this broadly defined category are target groups made up of individuals and organizations who are directly impacted by the outcome of the study, those who are indirectly affected, and those with a related special interest. Identifying all stakeholders affected by the study is the first step toward determining the range of public involvement necessary to incite meaningful participation. The following list defines target audience and stakeholder groups.

- Tier 1 Stakeholders (directly impacted, project decision makers) - Partnering Agencies (ADOT, BLM, FHWA)
- Tier 2 Community Contacts and Cooperating Agencies (directly impacted and indirectly affected; federal, state, regional, and local government agencies; municipal facilities, schools, the public, trucking agencies etc.; and property owners within study boundary.
- Tier 3 Roadway Users (related special interest) (traveling public)

The public involvement goal is to work directly with stakeholders throughout the process to ensure all concerns and aspirations are understood and considered.

2. PUBLIC INVOLVEMENT ROLES AND RESPONSIBILITIES

Please refer to Appendix C for the roles and responsibilities matrix related to this project.

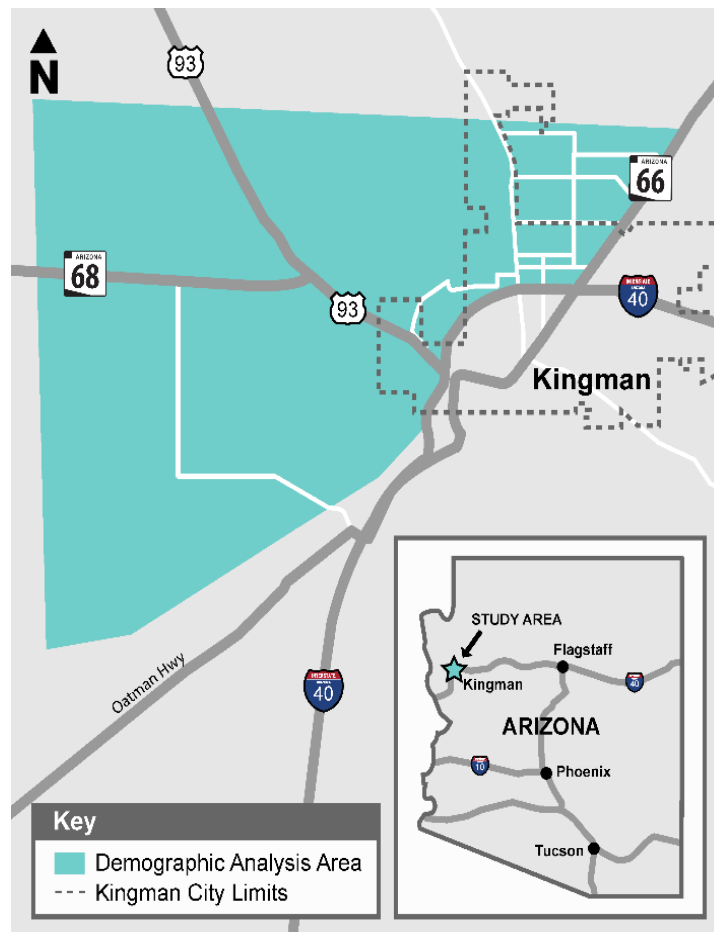
² The study team includes technical team members from Jacobs, HDR., BLM, FHWA, and ADOT.

3. STAKEHOLDER ASSESSMENT

3.1. Title VI, Environmental Justice (EJ) and Limited English Proficiency (LEP) Evaluation

Demographics were assessed using US Census Bureau American Community Survey, 2013-2017. Reports can be found in Appendix B. The area evaluated is depicted in the map below (see: Figure 2).

Figure 2: Demographic Analysis Area



The study area comprises 19 percent minority population, meaning that our Title VI and EJ populations will have some access to the study area. A LEP Four-Factor Analysis was completed to measure and document LEP needs in relation to the impacted study area using the ADOT PIP (2017) as guidance. The analysis does not indicate frequent contact with a non-English speaking population, therefore it will not be necessary to translate materials or provide interpretation at the public hearings, unless a request for accommodation is received through the ADOT Communications office. The results of the LEP are available in Appendix B.

3.2. Community Assessment

Minority Populations

The population in the study area is approximately 31,979 with a total minority population of 6,076, or 19 percent, which is lower than the percentage of minorities in the State of Arizona (42 percent).

The population by race in the study area is as follows:

Population reporting one race:	
White	93%
Black	1%
American Indian	2%
Asian	1%
Some other race	1%
Population reporting two or more races	3%
Total Hispanic Population	13%

Age and Gender

Most of the population is between the ages of 18-65, 49 percent female and 51 percent male.

Population by Sex:	
Female	15,669
Male	16,309

Population by Generation:	
Generation A: Born 2017 or later	3%
Generation Z: Born 1999-2016	18%
Millennial: Born 1981-1998	18%
Generation X: Born 1965-1980	18%
Baby Boomer: Born 1946-1964	32%
Silent & Greatest: Born 1945 and earlier	11%

Household Income and Poverty

The median household income is \$36,431 with an average household size of 2.36. Twenty-two percent of the households in the study area are below the poverty level. The average household size in the study area is the same as the average for Mohave County (2.37) and slightly below that of the State (2.64). Twenty-nine percent of the population is earning between \$25,000-50,000 and 17 percent of the population earns between \$15,000-24,999.

Homeownership

Sixty-eight percent of homes are owner occupied, and 32 percent of homes are renter occupied.

Commutes to Work/Use of Transit

Trends within the study area indicate that most people use personally owned vehicles for travel, while very few (less than 1 percent) utilize public transportation.

Commute to Work	
Drive Alone	79.7%
Carpool	14.7%
Public Transportation	0.9%
Bicycle	0.8%
Walk	0.5%
Other means (taxicab, motorcycle, etc.)	0.8%
Work at Home	2.0%

Employment

Thirty-one percent of the population (10,212) are in the labor force. Ninety-five percent of workers age 16 or over work within the state (Arizona) or county (Mohave) of residence, while nearly four percent work outside of their state and county of residence.

Disability

Forty-two percent of households in the study area report one or more persons with a disability. It is important to note that age/gender, homeownership, commute to work/use of transit, employment and disability are not protected factors or required factors to be analyzed under Title

VI, EJ or LEP. However, these additional factors are analyzed to improve decision making and regional equity, enhance understanding of issues and tailor approaches to the needs of the study area.

4. PUBLIC INVOLVEMENT TOOLS AND TECHNIQUES

The following public involvement activities and techniques will be used to engage stakeholders in the public hearing process. Any public involvement efforts made in consideration of feedback received from our stakeholders will be documented and updated in this PIP.

Website (Inform/Consult)

Jacobs will manage content for the study website that will offer the public and team 24/7 access to current information and documents related to the study. The website will provide a central, consistent source of information and updates intended to educate the public about the study and provide an opportunity for input.

For LEP audiences, the website includes a language translation feature as well as a font enlargement feature and will comply with Website Accessibility Initiative standards and the American Disabilities Act (ADA) standards.

The site will be regularly reviewed and updated by Jacobs to maintain the most current and accurate information. ADOT Communications will be responsible for posting content received from Jacobs as well as hosting and maintaining the website.

Social Media (Inform)

A social media strategy may be developed to advertise events, share relevant media, and inform stakeholders about the study and public hearing. Social media content will be developed and managed by ADOT. Notifications about study events and activities may be shared on the following ADOT social media outlets as appropriate:

- Twitter (twitter.com/ArizonaDOT)
- Facebook (facebook.com/AZDOT)
- Blog (azdot.gov/blog)
- YouTube (youtube.com/ArizonaDOT)

Public Hearing (Inform/Consult)

A public hearing will be scheduled to inform stakeholders on alternatives developed during the study and present a recommended alternative. Materials presented at the public hearing will also be made available on the study website before and after the hearing.

5. PUBLIC HEARING

5.1. Public Hearing Planning

One of the public involvement elements for this study will be a public hearing. The purpose of the public hearing will be to collaborate, consult, and inform agency and community stakeholders and obtain public comments.

Planning for the public hearing will be a collaborative effort between HDR's public involvement team, ADOT Communications, the study team, and the partnering agencies to ensure hearing format, location, time, and date are aligned to fulfill the intended purpose of the hearings, ensuring consideration is taken for all partner's concerns and interests.

5.2. Hearing Format

The hearing will be formatted in a way that encourages meaningful feedback from agency and community stakeholders. Garnering meaningful feedback from stakeholders means the study team, in collaboration with partnering agencies, will need to develop materials that inform and provide detailed information about the study and the purpose of public involvement.

Requests for accommodation will be considered as required by Title VI of the Civil Rights Act of 1964 (See Chapter 4) and managed through ADOT channels.

The public hearing will be setup to allow the attendees to review the Draft EA and preliminary design concept and study information through a variety of methods that may include display boards, roll plots, factsheets, and/or a presentation by the study team. The exact tools to be used will be determined in conjunction with the study team, ADOT Communications, and partnering agencies. The public hearing will allow the public to provide comments and ask questions. Comments and questions will be documented and responded to in the Final EA and preliminary design concept and recorded in a public hearing summary report.

5.3. Hearing Location

The public hearing location will be chosen based on criteria established in ADOT's Public Involvement Plan (2017). HDR will research locations along the study corridor to identify a hearing location that is accessible to the majority of the affected stakeholders. No selection will be made, or agreement/contract signed until possible locations are reviewed with ADOT Communications, partnering agencies and study team (including ADOT Communications). Considerations will be made for the following elements:

- Is the location conveniently located to attend, within or near the study area?
- Is the facility easily accessible from transit?
- Is there a place for signage directing people to the correct room/s?
- Is there enough free public parking?
- Is the parking lot well-lit for an evening public hearing?
- Does the facility provide technical resources to include Wi-Fi, projectors, projector screens, and other audio/visual equipment?
- Is the facility ADA compliant?
- Are other events or meetings schedule on the same date and time? Could they conflict with or disrupt the hearing?

5.4. Hearing Room Layout

The room layout will be arranged to accommodate the number of people expected and the elements according to the purpose of the hearing (roll plots, comment stations, court reporters, interpreters, etc.). Room layouts will be drafted and reviewed by the study team before the hearing takes place. Every effort will be made to ensure the rooms are ADA compliant and outfitted to accommodate any LEP requests made prior to the hearing.

5.5. Virtual Public Hearing

A virtual public hearing is a meeting that is held online and/or via telephone, in which members of the public log on or dial in to the hearing and participate via the internet or telephone. A virtual public hearing may be held in the following two situations: (1) as a supplement to an in-person public hearing, or (2) as a substitute for an in-person public hearing when the Governor and/or

President declares a health or other emergency or ADOT determines that an in-person public hearing should not be held out of concerns for public health or safety.

Notice of a virtual public hearing must comply with the requirements stated below in Subsection 5.7 (“Public Hearing Notification”), including the requirement to develop and implement strategies to address the underserved and LEP populations where such populations are identified in the project area. Notice of a virtual public hearing must also include the following:

- clear instructions about how to log on or call in to the virtual public hearing;
- an explanation of how the virtual public hearing will be conducted; and
- a statement that members of the public may, as an alternative to logging on or calling in to the virtual public hearing, contact the study team to ask questions about the study, access study materials, and submit public comments via the study information line, the study email, the study website, or USPS mail.

A virtual public hearing should be scheduled in accordance with the recommendations in Subsection 5.6 (“Hearing Time and Date”) below. A virtual public hearing must satisfy the purposes of a public hearing identified in Section 5.1 (“Public Hearing Planning”) above. Specifically, a virtual public hearing must comply with the following:

- Participants in a virtual public hearing may be asked to “sign in” by entering their name, telephone number, and email (no account or password will be required).
- ADOT’s standard nondiscrimination language must be displayed to participants in a virtual public hearing.
- A virtual public hearing must present the web address for a website at which study materials will be posted for public viewing during and after the virtual public hearing. See Subsection 5.2 (“Hearing Format”) above for the study information that must be made available.
- A virtual public hearing must include a presentation by the study team. The presentation will include both audio and visual components. The presentation must provide that participants may submit comments via the study information line, the study email, the study website, USPS mail, or verbally during the virtual public

hearing. The presentation may be pre-recorded and uploaded for viewing at the scheduled public hearing time, and thereafter.

- The presentation must explain to participants in the virtual public hearing that they may ask questions about the study at any time via the study information line, the study email, or the study website.
- Following the presentation, the virtual public hearing will include an allotted amount of time for members of the public to verbally provide testimony.
- Strategies for communicating with LEP populations during the virtual public hearing must be developed, including providing interpreters if needed.
- A transcript of the presentation given in the virtual public hearing must be prepared.
- A recording of the virtual public hearing must be made and posted online until at least the end of the comment period (if the comment period is extended by ADOT, until the end of the extended comment period).
- The post-public hearing activities set forth in Section 6 (“Public Involvement Documentation”) below apply following a virtual public hearing.

5.6. Hearing Time and Date

Planning for the public hearing will be a collaborative effort between the HDR public involvement team, the study team, and the partnering agencies to ensure hearing format, location, time, and date are aligned to fulfill the intended purpose of the hearing, ensuring consideration is taken for all partner’s concerns and interests.

The community will be critical to determining the right date and time to host the public hearing. Data collected from the Stakeholder Assessment will be analyzed to determine which day of the week and what time is most convenient for the majority of people. When selecting the hearing date, the following conflicts will be considered:

- local government meetings
- COG/MPO meetings
- local/special events
- holidays

- known religions services or holidays
- local chamber of commerce meetings/events
- local school events or meetings

5.7. Public Hearing Notification

Notification of the public hearing will be provided by placing a display advertisement in the Sunday edition of the Kingman Miner newspaper that serves the study area, at least 15 calendar days, but no more than 30 calendar days, before the hearing. A tear sheet will be provided to ADOT Communications to confirm the advertisement ran as scheduled. The advertisement will include the following:

- the purpose of the public hearing
- explanation of the format for the public hearing
- study description (use of location map)
- date, time and location of the public hearing
- map of public hearing venue and immediate surrounding area with north directional arrow
- the recommended action (alternative)
- list of locations and other sources (such as websites) where the environmental documents and other materials are available for public review
- list project information line, email address and mailing address
- study website address
- ADOT project number and federal ID number, if applicable
- comment due date
- ADOT's standard nondiscrimination language

The ADOT study website will provide up-to-date study information including the Draft EA and preliminary design concept, study area maps, the public hearing presentation, hearing summaries, other informational materials, and contact information. Jacobs and HDR will work with ADOT to provide the files and content for web posting.

ADOT Communications will write and distribute a news release and GovDelivery communication to email subscribers at least 15 calendar days prior to the public hearing date. In addition, ADOT Communications will contact the communications offices at Mohave County and the city of Kingman and request the public hearing information be publicized on their respective "owned media" channels, i.e., website, social media, constituent newsletters, etc.

ADOT Communications will prepare and distribute a public hearing flyer to downtown businesses, Kingman library and other organizations (such as Chamber of Commerce, HOAs and civic groups) and ask them to distribute to members and post online at least 15 calendar days prior to the public hearing date.

5.8. Public Hearing Staffing

When selecting staff for the public hearing, the following will be considered:

- **Qualifications:** Staff members who have been working on the study and are familiar with the types of issues to be addressed at the event will be utilized.
- **Personality:** Because not everybody has the skills necessary to work with the public, it will be important to assign roles to those best suited to their personality type.
- **Roles:** Specific roles will be assigned to assist in the event running smoothly and everyone involved feeling useful. These roles may include the following:
 - *Greeter/sign-in table:* Assign friendly staff to this task since they provide the first impression and are often the first to encounter individuals with concerns.
 - *Circulators:* These people have the most knowledge about the study, can answer questions or know where to get the answers (study managers or subject-matter experts, e.g. the study manager; representatives from ADOT Environmental Planning or their designated consultant; and study engineers)
 - *Media Relations:* If a member of the Office of Public Information is not in attendance, one individual should be assigned to coordinate with the media, preferably someone with ADOT.
 - *Government Relations:* One individual, preferably from ADOT Government Relations, should be assigned to coordinate with elected officials.

- *Moderator/Facilitator:* Depending on the hearing format, a moderator can be useful in keeping the flow of comments moving in an equitable fashion and maintaining the hearing schedule. Typically, the moderator/facilitator will be from the Office of Community Relations.
- Assignments may also be needed for scribes and photographers-videographers.

The appropriate number of staff working the public hearing will be determined based on the number of anticipated attendees, the hearing room layout and the goals of the public hearing. In the event attendee turnout is lower than anticipated, extraneous staff will be excused.

5.9. Public Hearing Staff Briefings

Study team members will be updated at briefing meetings before the public hearing so they are well versed on information being presented and will be able to answer questions anticipated from the public. Discussion and preparation will focus on the following:

- who will be attending
- review of any handouts or display materials available at hearing
- review/rehearsal of presentation
- development of internal talking points to be used by team members as a resource
- agreement regarding roles and responsibilities of ADOT staff and consultant staff
- review of managing and processing and written oral comments
- review room setup: direction of flow, where to enter, where displays are located, sign-in table, etc., and identify locations for specialized information stations such as video and comment stations and placement of staff members)

6. PUBLIC INVOLVEMENT DOCUMENTATION

6.1. Public Involvement Summary

After the public hearing, HDR will prepare Public Hearing Summary Report. ADOT Communications will work with HDR to complete the Title VI Meeting Report 2-page form. The form provides additional information on required attachments, such as photos documenting the Title VI brochures (English & Spanish) self-identification survey displayed at the public hearing, a copy of the print advertisement, etc.

For the Public Hearing Summary Report, this document will summarize all activities relating to the public hearing, including, but not limited to:

- Notification methods used to inform stakeholders and the public of the hearing
- Information on the attendees
- Outcomes from the public hearing
- Comments received, and responses provided
- Photos of public hearing
- Copies of meeting presentation and handouts
- Any needed follow up from the public hearing

6.2. Managing Public Comments

The public involvement process necessitates consistent procedures for recording and responding to public comments and for relaying public comments to key study team members and decision makers. All comments directed to the study team regarding the study will become part of the public record.

Comments can be collected at any time during the decision-making process using a variety of tools as outlined below. All comments will be documented in an HDR managed public comment log and forwarded to the study team for response when necessary.

- Comment Card
- In person at the public hearing either verbally, online, or via comment card
- Study Information Line: 602.474.3919
 - Comments received via telephone will be checked and logged by HDR.
- Study Email: WestKingmanTI@hdrinc.com
 - Comments received via email will be checked and logged by HDR.
- USPS Mail: West Kingman TI Study Team, c/o HDR, Inc 20 E. Thomas Ste. 2500, Phoenix, AZ 85012
 - Comments submitted by the USPS will be monitored and logged by HDR.
- Study Website: <https://azdot.gov/WestKingmanTI>

The email address, phone number and return mailing address that stakeholders and other members of the public can submit public comments to will be set up, maintained, and managed by HDR through the public comment period. ADOT Communications will setup and maintain the online public comment form on the ADOT study webpage. The online form will be setup so comments go directly to Jacobs via email.

All comments received will be combined and compiled into the public comment log developed by Jacobs at the beginning of the comment period. Comments will be logged with the following information:

- **Date** – This is important for documenting the evolution of the study. It also establishes a benchmark for a timely response.
- **Comment** – It is important to document the comment, so a sufficient response can be developed and to understand potential trends that could emerge. All comments provided by members of the public should be documented as such (e.g., provided by a member of the public).
- **Name, address, telephone number and email address** – This information is optional and is often redacted within reports or summaries but is valuable information to obtain for the life of the study.
- **Nature of comment** – This data will allow for easy categorization of comments to be submitted for NEPA or Title VI documentation, and to capture and summarize trends.

A comment processing flow chart can be found in Appendix D.

Comments and questions received during the public hearing will be monitored and logged into the communication log by Jacobs. Compilation will include creating a master spreadsheet of all comments, including date and time of comment, comment method, nature of comment, commenter name, contact information (if provided), and ADOT responses. During the comment period, Jacobs will work with the study team to develop responses to comments that require follow-up. No replies will be sent without first being reviewed and approved by the study team.

Media Inquiries

Responses to media inquiries will be handled by ADOT Communications in coordination with the designated points of contact of the study team.

Appendix A: Requirements for Public Involvement per ADOT PIP (2017)

This appendix provides federal statutes and regulations for public involvement. Approaches to the degree of public involvement will vary with the complexity and impact of each study. The Arizona Department of Transportation (ADOT) will implement public involvement efforts in response to federal guidelines under Title VI of the Civil Rights Act of 1964, Environmental Justice (EJ) Executive Order 12898, Limited English Proficiency (LEP) Executive Order 13166, the Americans with Disabilities Act (ADA) and the National Environmental Policy Act of 1969 (NEPA).

Federal regulations do not specifically define how to perform public involvement. Study teams develop and implement public involvement plans that are relative to the needs of the study and public. This flexibility allows adoption of the following guidance, which seeks to encourage public participation by a comprehensive range of stakeholders. As an agency, study team members will be familiar with the guidance, practices and documentation required as stated in this document and especially with the federal requirements for Title VI, EJ, ADA and LEP outreach and for NEPA. All study team members will be familiar with ADOT's PIP and use the tactics required for federal compliance for public participation.

[Authorizing Legislation](#)

Public involvement has long been an integral part of federal transportation legislation. The initial Federal Highway Act (Federal Aid Road Act of 1916) focused on expanding the highway system, but subsequent bills incorporated multimodal and public involvement elements. The Intermodal Surface Transportation Efficiency Act (ISTEA) of 1991 represented a transformation, with an intermodal approach to funding and great emphasis on public involvement and collaborative planning. ISTEA's successor in 1998, the Transportation Equity Act for the 21st Century (TEA-21), expanded public involvement to include transit and freight. The Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users (SAFETEA-LU) was enacted in 2005 and broadened public involvement requirements. Moving Ahead for Progress in the 21st Century (MAP-21) was enacted in 2012 and public involvement remains a hallmark of the transportation planning process, along with 2016's Fixing America's Surface Transportation (FAST) Act. In addition to the transportation bills, following are other federal regulations that affect how public involvement activities are planned and executed, which will be adopted and documented within ADOT's public involvement procedures.

Title VI of the Civil Rights Act of 1964

Title VI of the Civil Rights Act of 1964 and related statutes assure that all individuals are not excluded from participation in, denied the benefit of, or subjected to discrimination on the basis of race, color, national origin, age, sex, and disability. Title VI of the Civil Rights Act of 1964 and Executive Order 13166 for Limited English Proficiency (LEP) individuals prohibits recipients of Federal financial assistance from discrimination based on national origin. Executive Order 12898 on Environmental Justice directs that programs, policies, and activities not have a disproportionately high and adverse human health and environmental effect on minority and low-income populations. The implementation of the PIP will provide an opportunity for these protected populations to participate in the transportation decision-making process.

ADOT's standard nondiscrimination language will be included in hearing collateral as required and will be posted at the public hearing location. Text will read:

Pursuant to Title VI of the Civil Rights Act of 1964, the Americans with Disabilities Act (ADA) and other nondiscrimination laws and authorities, ADOT does not discriminate on the basis of race, color, national origin, sex, age, or disability. Persons who require a reasonable accommodation based on language or disability should contact <ADOT Title VI Contact> at 602.712.XXXX or ADOTContact@azdot.gov. Requests should be made as early as possible to ensure the State has an opportunity to address the accommodation.

De acuerdo con el Título VI de la Ley de Derechos Civiles de 1964, la Ley de Estadounidenses con Discapacidades (ADA por sus siglas en inglés) y otras normas y leyes antidiscriminatorias, el Departamento de Transporte de Arizona (ADOT) no discrimina por motivos de raza, color, origen nacional, sexo, edad o discapacidad. Las personas que requieran asistencia (dentro de lo razonable) ya sea por el idioma o discapacidad deben ponerse en contacto con la <ADOT Title VI Contact> a 602.712.XXXX o ADOTContact@azdot.gov. Las solicitudes deben hacerse lo más antes posible para asegurar que el Estado tenga la oportunidad de hacer los arreglos necesarios.

Americans with Disabilities Act (ADA) of 1990

The Americans with Disabilities Act of 1990 (ADA) stipulates that people with disabilities be involved in developing and improving public services. In highway planning, collaboration with persons with disabilities is essential for developing access points beyond those that are required. Public Involvement activities related to the study are open to the public will be made accessible to everyone, including persons with disabilities.

The following tools will be used throughout the study Public Involvement process to allow persons with disabilities have access to transportation decision-making processes throughout the study's lifecycle:

- Develop contacts, mailing lists, and other means to initiate and continue communication with persons with disabilities.
- Conduct research through U.S. Census Bureau's "American Community Survey" for data on persons with disabilities.
- Include ADOT's standard nondiscrimination language (constructed at a basic literacy level) on all digital or printed material created for public dissemination for special accommodation requests.
- Identify public meeting locations that are ADA-compliant; venues also should be accessible by ADA-compliant public transit when available and feasible.

Environmental Justice

In 1994, Executive Order (EO) 12898 Federal Actions to Address Environmental Justice in Minority³ Populations and Low-Income Populations was issued. It states that Environmental Justice "is the fair treatment and meaningful involvement of all people, particularly minority, and low-income populations, in the environmental decision-making process." The study will follow the NEPA process (Figure 1), which also includes requirements for identifying and engaging EJ communities to increase equity in transportation throughout the decision-making process.

To engage traditionally underserved communities, the following community engagement tools will be used:

- Develop community contacts, mailing lists and other means to initiate and continue communication.

³ Minority is defined as:

- Black (a person having origins in any of the black racial groups of Africa)
- Hispanic or Latino (a person of Mexican, Puerto Rican, Cuban, Central or South American, or other Spanish culture or origin, regardless of race)
- Asian American (a person having origins in any of the original peoples of the Far East, Southeast Asia, the Indian subcontinent)
- American Indian and Alaskan Native (a person having origins in any of the original people of North America, South America, including Central America, and who maintains cultural identification through tribal affiliation or community recognition)
- Native Hawaiian or Other Pacific Islander (people having origins in any of the original peoples of Hawaii, Guam, Samoa, or other Pacific Islands).

- Conduct community interviews, including one-on-one meetings with local community groups and community leaders.
- Initiate intergovernmental collaboration.
- Display ADOT’s nondiscrimination language on all public advertisements and other collateral or tools used to create awareness for public meetings, and to inform the public of their rights under the laws to be provided accommodations at no cost to them when needed.
- Select meeting locations that are accessible by public transportation, if and when possible.
- Share information, with permission, at religious centers and common community meeting places.
- Public meetings hosted at practical times and dates based on community profile data, past input from the community and other stakeholders.

Limited English Proficiency

ADOT’s Public Involvement programs strive to be innovative and proactive in engaging individuals from different cultures and backgrounds in the study development process. Limited English Proficiency is used to describe individuals who are not proficient in the English language. Title VI and Executive Order 13166 prohibit recipients of federal financial assistance from discrimination based on national origin. Recipients of federal financial assistance are required to take reasonable steps to provide LEP individuals with meaningful access to their programs, activities and services. The LEP guidance included in this PIP is aligned with ADOT’s Language Access Plan, prepared by ADOT’s CRO.

The resources listed below are some of the tools that help identify and engage impacted LEP communities, early and throughout the life of the transportation study:

- Conduct community interviews to determine LEP needs. Interview staff should have as a resource the United States Census 2000 Language Identification Flashcard, if needed, during outreach efforts.
- Utilize ADOT’s Foreign Language Vendor List to engage LEP communities, if needed.
- Initiate intergovernmental coordination or collaborative efforts with service groups that can help identify and engage LEP communities.
- Use the LEP Four Factor Analysis to measure and document LEP needs in relation to the impacted study area. This analysis balances the following four factors:

- The number or proportion of LEP persons served or encountered in the eligible service population (“served or encountered” includes those persons who would be served or encountered by the recipient if the persons received adequate education and outreach and the recipient provided sufficient language services)
 - The frequency with which LEP persons come into contact with the program
 - The nature and importance of the program, activity or service provided by the program
 - The resources available and costs to the recipient.
- Conduct research through U.S. Census Bureau’s “American Community Survey” and the Environmental Protection Agency’s EJ page tool, which report data on “language spoken at home” and Linguistically Isolated Households to help identify LEP persons.
 - Utilize the Safe Harbor Threshold as a guide to determine when written translation of vital documents for each eligible LEP language group is necessary. Eligibility is met if the LEP language group constitutes 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 or activity.
 - Develop contacts, mailing lists, and other means to initiate and continue communication.
 - Display ADOT’s nondiscrimination language on all public advertisements and other collateral or tools used to create awareness for public meetings, and to inform the public of their rights under the laws to be provided accommodations at no cost to them when needed.
 - Provide Title VI brochures, poster 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 advance notice, provide requested translation or interpretation services at all public meetings.
 - Select meeting locations that are accessible by public transportation.
 - Provide digital and printed materials in the language(s) of the identified LEP group(s).
 - Use visual images or simulation videos, especially at public meetings, when feasible.

Federal Highway Administration (FHWA)

The Federal Highway Administration (FHWA) is an agency within the U.S. Department of Transportation that supports state and local governments in the design, construction and maintenance of the nation’s

highway system and various federally and tribal-owned lands. FHWA supports state and local governments through the Federal-Aid Highway Program (FAHP) in the design and construction of roads and bridges.

In addition to the stated NEPA requirements for public involvement, the following regulation prescribes the policies and procedures of the FHWA and the Federal Transit Administration FTA (FTA) for implementing NEPA as amended and the regulation of the Council on Environmental Quality (CEQ), 40 CFR 1500-1508. This regulation sets forth all FHWA, FTA and U.S. Department of Transportation (DOT) requirements under NEPA for the processing of highway and urban mass transportation projects.

The Code of Federal Regulations (CFR) Title 23 (referring to Highways) identifies the requirements for public involvement. Pursuant to 23 CFR Section 771.111, ADOT is required to provide the appropriate documentation and implement the following guidance within the PIP for NEPA studies:

- Public involvement in the identification of social, community, economic and environmental impacts, as well as impacts associated with relocation of individuals, groups or institutions.
- Public hearings at convenient times and places for any study that has substantial impact on right of way; layout or functions of roadways or facilities; adjacent properties; or social, community, economic, or environmental resources.
- Reasonable notice of public hearings and other public meetings.
- Explanation during public hearings of the study purpose and need; consistency with local plans; study alternatives and major features; social, community, economic and environmental impacts; relocation assistance and right-of-way acquisition programs; and procedures for receiving oral and written comments from the public.
- Submission of a public hearing transcript to FHWA and certification that a required hearing opportunity was offered.
- Public involvement opportunities in defining the purpose and need and range of alternatives to be considered in an environmental document.
- Public notice and the opportunity for public review and public comment on of Section 4(f) de Minimis impact findings.

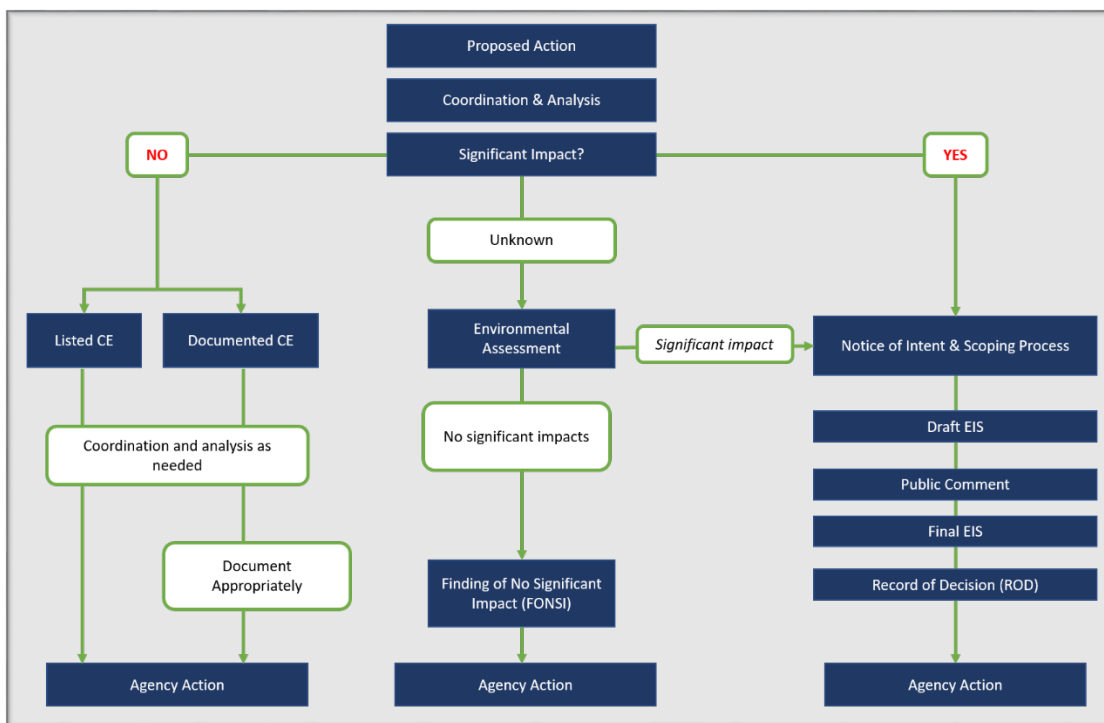
- Public notice and the opportunity for public review and public comment on impacts to historically significant properties and other resources in accordance with the FHWA Historic Preservation and Archeology Program.

FHWA requirements outlined in 23 CFR Section 450.210 specify that for states that are carrying out the statewide transportation planning process, including development of the Long-Range Transportation Plan (LRTP) and the Statewide Transportation Improvement Program (STIP), the state shall develop and use a documented public involvement process that provides opportunities for public review and comment at key decision points.

National Environmental Policy Act of 1969

The NEPA process requires environmental analysis of proposed actions prior to making decisions, including constructing highways and other publicly owned facilities. The FHWA oversees the NEPA process at the federal level to guide the overall process. Using the NEPA process (Figure 1), agencies evaluate the environmental and related social and economic effects of their proposed actions. Agencies must also provide opportunities for public review and comment on those evaluations. In cooperation with FHWA, ADOT must follow the NEPA process for all federally-funded projects. ADOT Environmental Planning (EP) will work closely with ADOT Communications to provide for NEPA compliance for meaningful public involvement when assessing the environmental effects of the proposed actions.

NEPA Process



Following this Public Involvement Plan (PIP) will assist identifying and engaging all populations for the proposed action, including Title VI, people with disabilities, LEP and EJ communities are identified and engaged. The following public involvement guidelines, mandatory for all NEPA studies, will be implemented:

- Use of public hearings or meetings when appropriate
- Solicitation of information from the public, throughout the EIS process
- Early and continued communication with potentially affected neighborhoods to identify neighborhood impacts and avoid overlooking or excluding people from the process
- Provide reasonable access to and an explanation of where information about the NEPA process and ongoing environmental documents can be found
- Public review of environmental documents, comments received and any supporting documents
- Providing public notice of NEPA-related hearing(s), public meetings and the availability of environmental documents through direct notice to those who have requested it, publication in

the Federal Register (for actions of national concerns) and the following for actions that are primarily of local concern:

- Notice to Native American Tribes, where appropriate
- Publication in local newspapers of general circulation
- Notice through other local media
- Notice to potentially interested community organizations
- Publication in newsletters that may reach interested persons
- Direct mailing to owners and occupants of affected property
- Posting of notice on and off site in the area where the action is to be located

Appendix B: Limited English Proficiency Evaluation – Four Factor Analysis

1st Factor: Number & Proportion of LEP Persons served or encountered in the service area

Total Population Evaluated: 29,826 (2013-2017 ACS Population Summary, Population age 5+ years by language spoken at home and ability to speak English)

Population age 5+ years by ability to speak English:

Speaks English less than very well: 283 (1%)

Population by language spoken at home:

English: 27,803 (93%)

Spanish: 1,618 (5%)

Other Languages: 394 (1%)

2nd Factor: Frequency with which LEP individuals come into contact with program, activity, and service.

Considering the low percentage of populations with limited ability to speak English (1%, 283) in the community, the LEP community may not have frequent contact with the study area. The level of interaction is low. Language translation will not be provided as the Safe Harbor Threshold was not met (the total population of the persons eligible to be served who speak English is less than 1,000).

3rd Factor: Importance to LEP persons of program, activities, and service.

Critical information regarding the study and impacts on the community will be made available in English only. Interpretation requests received within a reasonable amount of time will be accommodated at the public hearing through the ADOT Title VI process.

4th Factor: Resources available and cost.

No language services are anticipated to be provided.

(Information gathered from the US Census Bureau, 2013-2017 American Community Survey)

Appendix C: Responsibilities Matrix

Task / Activity	Team Member				
	HDR Public Involvement Estelle	HDR Public Involvement Miller	Jacobs PM Wilbrink	ADOT Communications Beggs	HDR PM Barela
I Team Meetings					
Attend up to 4 communications / study team meetings	Lead project team / schedule meetings	Participate	N/A	Participate	N/A
II Community Assessment					
Assess the project area for LEP and Title VI characteristics	Prepare	Review	N/A	Review/Approve (ADOT Civil Rights Office)	N/A
III Develop Public Involvement Plan					
Prepare draft PIP document, incorporating LEP & Title VI characteristics	Prepare	Review	N/A	Review/Approve	N/A
Prepare final PIP document	Prepare	Review	N/A	Review / Approve	Review
IV Public & Key Stakeholder Outreach					
Update ADOT website content	Review	Review	Prepare	Review/Approve	N/A
Monitor, log, and coordinate responses to public comments & inquiries	N/A	N/A	Prepare/Participate/Review	N/A	Participate with Responses
V Public Meetings/Hearing					
Prepare public hearing strategy including messaging	Prepare	Review	Participate / Approve	Participate / Approve	Participate
Determine meeting/hearing format	Prepare	Review	Participate / Approve	Participate / Approve	Participate
Create meeting notifications for local publication in newspaper (1)	Prepare	Review	Participate / Approve	Review / Approve	Review
Coordinate placement of newspaper advertisement	Prepare	N/A	Review / Approve	Review / Approve	N/A

Task / Activity		Team Member				
		HDR Public Involvement Estelle	HDR Public Involvement Miller	Jacobs PM Wilbrink	ADOT Communications Beggs	HDR PM Barela
	Identify meeting locations (ADA / Transit considerations)	Prepare	N/A	Participate / Approve	Participate / Approve	Participate
VI	Graphics - Design & Production					
	Factsheet/ Handout (1)	Prepare	Review	Participate / Approve	Participate / Approve	Review
	Comment cards (1)	Prepare	Review	Participate / Approve	Review/Approve	N/A
	Sign-in sheets	Prepare	Review	Participate / Approve	Review/Approve	N/A
VII	Outreach Summary Report					
	Prepare draft summary document	Prepare	Review	Participate / Approve	Review/Approve	Review
	Prepare final summary document	Prepare	Review	Participate / Approve	Review/Approve	Review

Key

Prepare: Prepares document/information for review and input from project team.

Participate: Has direct participation in activities and assists with the preparation of documents/information for review and input from project team.

Review: Reviews information for technical accuracy, readability, grammar, punctuation, etc.

Approve: Approves final documents/information.