



5 COORDINATION AND OUTREACH

Coordination and outreach are fundamental components of effective transportation planning and the NEPA process. The NEPA process promotes informed decision-making by considering potential social, economic, and environmental impacts. Throughout the development of this Tier 1 EIS, FHWA and ADOT have engaged federal, state, regional, county, local, and tribal governments, as well as the general public. This chapter is a summary of outreach and engagement activities.

5.1 Summary of Outreach and Coordination for Draft Tier 1 EIS

This section summarizes Cooperating and Participating Agencies activities, as well as major outreach and engagement, that occurred prior to the publication of the Draft Tier 1 EIS. Major outreach opportunities prior to publication of the Draft Tier 1 EIS included pre-scoping, scoping, agency/public information meetings, and recurring agency coordination meetings. Further detail and information on the outreach described below can be found in **Chapter 5** (Coordination and Outreach) and **Appendix G** (Public Involvement Materials) of the Draft Tier 1 EIS.

Cooperating and Participating Agencies: FHWA and ADOT requested local and federal agencies and tribal governments participate in the environmental review process by inviting them to be a Cooperating Agency or a Participating Agency under NEPA guidelines. In addition, agencies and others were invited to participate as consulting parties under Section 106 of the NHPA (see **Section 3.7** [Archaeological, Historical, Architectural, and Cultural Resources]). There are a total of 10 Cooperating Agencies; their roles and responsibilities have included early and regular participation in the NEPA process, and providing comments and guidance on major deliverables such as the Scoping Summary Report, Purpose and Need, Alternatives Selection Report Evaluation Methodology, Administrative Draft Tier 1 EIS, and Administrative Final Tier 1 EIS. Cooperating Agencies have continued to meet on a monthly basis as needed throughout the NEPA process.

There are 51 Participating Agencies; their roles and responsibilities have included early and regular participation, providing input on issues of concern, and review of the Draft Tier 1 EIS during the public review period. Meetings with Participating Agencies have occurred on an as-needed basis as issues arise. Four Participating Agencies that comprise the municipal planning organizations and/or Council of Governments within the Study Area participate in the Project Management Team and Executive Leadership Team: Maricopa Association of Governments (MAG), Pima Association of Governments (PAG), Sun Corridor Municipal Planning Organization (SCMPO), and South Eastern Arizona Governments Organization (SEAGO). The Project Management Team is a staff-level group that meets bi-monthly with FHWA and ADOT to discuss project status and provide feedback on current planning activities. The Executive Leadership Team meets quarterly as needed to keep executive leadership at FHWA, ADOT, MAG, PAG, SCMPO, and SEAGO apprised of current project status, and outstanding issues and provides collaborative guidance on key decision points. More detail on Cooperating Agencies, Participating Agencies, and agency coordination opportunities can be found in Draft Tier 1 EIS **Section 5.1.3** (Agency Coordination Opportunities).



1 **Pre-scoping Activities:** Pre-scoping activities occurred from March to May 2016, prior to the
2 formal start of the NEPA process. They offered an early opportunity to elicit information, issues,
3 and concerns, and discuss the Tier 1 EIS process with the agencies and other key stakeholders
4 in advance of formal scoping for the NEPA process. Approximately 50 pre-scoping meetings
5 were held with federal, state, regional, county, local, and tribal governments, as well as other
6 stakeholders.

7 **Agency and Public Scoping:** A 45-day scoping period held from May 23 to July 8, 2016, was
8 initiated by the publication of the *Notice of Intent to Prepare a Tier 1 EIS* in the Federal Register
9 in May 2016 (81 FR 32007). The purpose of scoping is to identify major issues and establish the
10 scope of the NEPA analysis. A preliminary Study Area presented to agencies and the public for
11 comment during the scoping process was established by the prior *I-11 and Intermountain West*
12 *Corridor Study* (NDOT and ADOT 2014). The input FHWA and ADOT received during scoping
13 helped identify the opportunities and constraints in the Study Area, the range of alternatives to
14 be studied, and approach and methodology for the environmental analysis.

15 FHWA and ADOT invited agencies, tribal governments, and organizations by letter to participate
16 in the scoping process and attend agency scoping meetings. Three agency scoping meetings
17 were held in the following locations: Casa Grande, Phoenix, and Tucson. Scoping activities also
18 included six public scoping meetings. The public was notified about the scoping process, public
19 scoping meeting locations, and schedule via newspaper advertisements, the project website
20 (i11study.com/Arizona), e-mail blasts, social media, news releases, media interviews, and blog
21 posts on the project website and ADOT website. The six public scoping meetings were held in
22 Nogales, Tucson, Marana, Casa Grande, Buckeye, and Wickenburg.

23 **Agency and Public Outreach During Alternatives Development:** Agency and public
24 information meetings were held in May 2017, which coincided with an approximately 30-day
25 comment period on the Alternatives Selection Report from April 28 to June 2, 2017. The
26 purpose of these meetings and comment period was to provide an update on project progress,
27 solicit input on preliminary recommendations for alternatives to carry forward into the Draft Tier
28 1 EIS, and continue to collect information on key issues to be evaluated in the Draft Tier 1 EIS.
29 Similar to the scoping meetings, six public information meetings were held in Nogales, Tucson,
30 Marana, Casa Grande, Buckeye, and Wickenburg. Four agency meetings were held in Tucson,
31 Marana, Casa Grande and Avondale to solicit comments from cooperating and participating
32 agencies and tribal governments. During the alternatives development period, Cooperating and
33 Participating Agencies also had the opportunity to review and provide input on key project
34 documents, including the *I-11 Tier 1 Purpose and Need Memorandum* (ADOT 2017k),
35 *Alternatives Selection Report Evaluation Methodology and Criteria Report* (ADOT 2017f), and
36 *Alternatives Selection Report* (ADOT 2017g).

37 In addition to outreach specific to the major milestones, the Project Team also met with agency
38 stakeholders on a regular basis. Recurring agency meetings include bi-monthly project
39 management team meetings, monthly cooperating agency meetings, and as-needed
40 coordination meetings with participating agencies, FHWA, ADOT, and stakeholder agency
41 leadership.

42 **Tribal Engagement:** Tribes were invited to attend agency and stakeholder meetings at each
43 major milestone throughout the study process (2016 scoping activities and 2017 agency and
44 public information meetings as previously described). The Ak-Chin Indian Community, Gila
45 River Indian Community, Pascua Yaqui Tribe, and Tohono O'odham Nation were engaged as

1 participating agencies throughout the planning process. A series of smaller meetings occurred
2 with the Ak-Chin Indian Community, Gila River Indian Community, Salt River Pima-Maricopa
3 Indian Community, Tohono O’odham Nation, Pascua Yaqui Tribe, and other tribal governments
4 that requested individual meetings.

5 **Additional Stakeholder Engagement:** Throughout the NEPA process, the Project Team has
6 received input and requests for coordination meetings with individual stakeholders as issues
7 arose. In response to stakeholder input focused on the Pima County area, FHWA and ADOT
8 invited the US Institute for Environmental Conflict Resolution, a neutral third party, to facilitate a
9 focused discussion with Pima County stakeholders to better understand the values, interests,
10 and characteristics most important to them. Two stakeholder groups participated in a series of
11 six meetings between March and April 2018. Documentation of each meeting is available on the
12 I-11 study website at i11study.com/Arizona. The US Institute for Environmental Conflict
13 Resolution prepared the final report documenting this meeting process, which is included in
14 **Appendix H** (Stakeholder Input) of the Draft Tier 1 EIS.

15 5.2 Draft Tier 1 EIS Outreach and Public Review Period

16 On April 5, 2019, FHWA published a notice of availability for the Draft Tier 1 EIS (84 FR 13662).
17 An Errata to the Draft Tier 1 EIS was prepared to include a section of the document missing
18 from the April 5, 2019, publication; it was made available for review on the project website on
19 April 25, 2019, and the comment period was extended through July 8, 2019 (84 FR 18634).
20 During the public review period, FHWA and ADOT conducted agency outreach and a public
21 hearing process to provide opportunities for comment. Six public hearings were held throughout
22 the Study Area and are listed in **Table 5-1. Appendix G** (Public Involvement Summary Report)
23 provides more detailed information on public hearings and the outreach process for the public
24 hearings.

25 **Table 5-1. Public Hearings (2019)**

| Date | Time | Location | Attendance |
|----------------|------------------|---|------------|
| April 29, 2019 | 5 p.m. - 8 p.m. | Palo Verde Energy Education Center 600 North Airport Road Buckeye, AZ 85326 | 430 |
| April 30, 2019 | 4 p.m. - 7 p.m. | Wickenburg Community Center 160 North Valentine Street Wickenburg, AZ 85390 | 103 |
| May 1, 2019 | 5 p.m. - 8 p.m. | Holiday Inn 777 North Pinal Avenue Casa Grande, AZ 85122 | 161 |
| May 7, 2019 | 5 p.m. - 8 p.m. | Quality Hotel Americana 639 North Grand Avenue Nogales, AZ 85621 | 35 |
| May 8, 2019 | 4 p.m. - 7 p.m. | Tucson Convention Center 260 South Church Hill Avenue Tucson, AZ 85701 | 226 |
| May 11, 2019 | 11 a.m. - 4 p.m. | Marana High School 12000 West Emigh Road Marana, AZ 85743 | 392 |



1 The public hearings provided opportunities for the public and agencies to comment on the Draft
2 Tier 1 EIS and review materials from the Draft Tier 1 EIS. Public hearings provided several
3 methods for submitting comments, including the ability to comment live to a hearing panel and
4 attendees, along with submitting comments via court reporters, hard copy comment forms, and
5 access to online comment forms. Comments could also be submitted via telephone, submitted
6 via the study email, mailed to ADOT, or submitted through the I-11 study website
7 (i11study.com/Arizona/) at any time throughout the public review period from April 5 through
8 July 8, 2019.

9 The Draft Tier 1 EIS public comment period and public hearings were also advertised through
10 newspaper ads in regional and statewide publications, mailers to addresses within half a mile of
11 the corridor, the project website (i11study.com/Arizona/), news releases, radio ads, emails to
12 the project email list, media interviews, and social media posts.

13 **5.3 Title VI, Environmental Justice, and Limited English** 14 **Proficiency**

15 Various federal laws and executive orders have been enacted to protect low-income and
16 minority populations. Title VI of the Civil Rights Act of 1964 prohibits discrimination based on
17 race, color, or national origin, including individuals with limited English proficiency. The intent of
18 consideration for individuals with limited English proficiency or impacted low-income and or
19 minority populations is to ensure they are provided meaningful access to information regarding
20 government programs or services; a failure to address this could potentially cause
21 discriminatory disparate impacts. **Section 3.5** (Community Resources, Title VI, and
22 Environmental Justice) and Draft Tier 1 EIS **Appendix E5** (Demographic Data to Support the
23 Title VI, Environmental Justice, and Limited English Proficiency Analysis) contain more detail on
24 these populations as well as tabular demographic data.

25 Executive Order 13166 requires federal agencies to assess and address the needs of otherwise
26 eligible persons seeking access to federally conducted programs and activities who, due to
27 limited English proficiency, cannot fully and equally participate in or benefit from those programs
28 and activities. According to the Department of Justice, "Individuals who do not speak English as
29 their primary language and who have a limited ability to read, speak, write, or understand
30 English can be limited English proficient. These individuals may be entitled [to] language
31 assistance with respect to a particular type or service, benefit, or encounter." The Department of
32 Justice Limited English Proficiency Guidance, in turn, advises each federal department or
33 agency to "take reasonable steps to ensure 'meaningful' access [to LEP individuals] to the
34 information and services they provide."

35 In addition to regulations related to limited English proficiency, ADOT's standard procedures for
36 public involvement require census data be analyzed to identify the most prominent languages
37 that are spoken within the Study Area and determine the translation and interpretation needs for
38 the project. Refer to Draft Tier 1 EIS **Appendix E5** (Demographic Data to Support the Title VI,
39 Environmental Justice, and Limited English Proficiency Analysis) for the census data. The
40 census data indicated that translation of the Spanish language would be necessary throughout
41 the public involvement process. Spanish interpreters were present at public hearings.

42 In the context of transportation, effective and equitable decision-making depends upon
43 understanding and properly addressing the unique needs of different socioeconomic groups.



1 One of the fundamental principles of the USDOT Environmental Justice Strategy is “[t]o ensure
2 the full and fair participation by all potentially affected communities in the transportation
3 decision-making process.” To ensure that everyone received an equal opportunity to participate,
4 FHWA and ADOT have taken several measures to meet the intent, guidelines, and
5 requirements of Title VI, environmental justice, and limited English proficiency. The following
6 standards were in place for each public meeting and hearing:

- 7 • An ADOT Communications team representative attended the public meetings and public
8 hearings and provided information about the public’s rights to ADOT’s nondiscrimination
9 programs. “Your Nondiscrimination Rights Under Title VI/ADA” brochures (in both English
10 and Spanish) were provided to attendees.
- 11 • In order to meet the federal requirement to collect demographic data of meeting attendees,
12 the opportunity was provided for attendees to complete the voluntary “Title VI Self
13 Identification Survey” card.
- 14 • The opportunity to request accommodations and modifications under the Americans with
15 Disabilities Act of 1990 (ADA) was provided in all public meeting and public hearing
16 advertising.
- 17 • Materials were provided in Spanish and English. Spanish interpreters were present at each
18 hearing and other translation services were available upon request.

19 Following an evaluation of the Study Area’s demographic data related to Title VI, limited English
20 proficiency, and environmental justice, FHWA and ADOT identified techniques to address and
21 reduce linguistic, cultural, institutional, geographic, and other barriers to meaningful
22 participation. Those techniques included:

- 23 • Translating all public involvement materials (included newspaper advertisements) into
24 Spanish, as well as other languages, such as Chinese, upon request.
- 25 • Providing Spanish interpretation at all public meetings and hearings, as well as other
26 languages, upon request.
- 27 • Adding an automatic online translator to the study website, allowing translation of website
28 text into approximately 100 languages, including Chinese and Vietnamese, for populations
29 found within the Study Area.
- 30 • Including Spanish language materials and graphics for download on the study website, as
31 well as other languages upon request.
- 32 • Establishing a bilingual study hotline both in English and Spanish (1-844-544-8049).
- 33 • Integrating elected officials, intergovernmental liaisons, and special interest groups into the
34 process.
- 35 • Coordinating, implementing, and documenting communications protocols with the 4 adjacent
36 and 22 statewide tribal governments.
- 37 • Using advertising and graphics to reach broader audiences.



- 1 • Holding public meetings and hearings in locations throughout the I-11 Corridor and Study
2 Area that are easily accessible and ADA compliant.
 - 3 • Holding public meetings and hearings along transit lines for those who are transit
4 dependent.
 - 5 • Providing reasonable accommodations, such as sign language interpreters, upon request.
- 6 Exhibits of bilingual meeting notifications and materials are included in Draft Tier 1 EIS
7 **Appendix G** (Public Involvement Materials), which includes the *I-11 Tier 1 EIS Scoping*
8 *Summary Report* (ADOT 2017I) and the *Agency and Public Information Meeting Summary*
9 *Report* (ADOT 2017e). Many of these overlap with tools that also reach the public at large, with
10 a goal of providing access so that everyone can participate.
- 11 All outreach and public involvement materials from all public meetings and public hearings that
12 have been held since the beginning of the study process can be accessed via the I-11 study
13 website at i11study.com/Arizona.

14 5.4 Comments on Draft Tier 1 EIS

15 The comment period for the Draft Tier 1 EIS was open to the public from April 5 through July 8,
16 2019. During this period, members of the public, cooperating agencies, participating agencies,
17 tribes, and other organizations and individuals submitted comments on the Draft Tier 1 EIS. The
18 Project Team received 12,445 comment submissions through the comment channels during the
19 official comment period. **Table 5-2** and **Table 5-3** summarize the number of comments by
20 source and form, respectively. **Figure 5-1** shows the geographic distribution of comments within
21 Arizona.

22 **Table 5-2. Source of Comments**

| Source | Number of Comments Received |
|---|-----------------------------|
| Individuals | 3,545 |
| Individual comments originating from national email campaigns including National Parks Conservation Association (npca@npca.com), Sierra Club (@knowwho.com), and (@everyactioncustom.com) | 8,751 |
| Businesses, Organizations, Other Agencies, and Elected Officials | 101 |
| Cooperating Agencies | 9 |
| Participating Agencies | 35 |
| Tribes | 4 |
| Total | 12,445 |

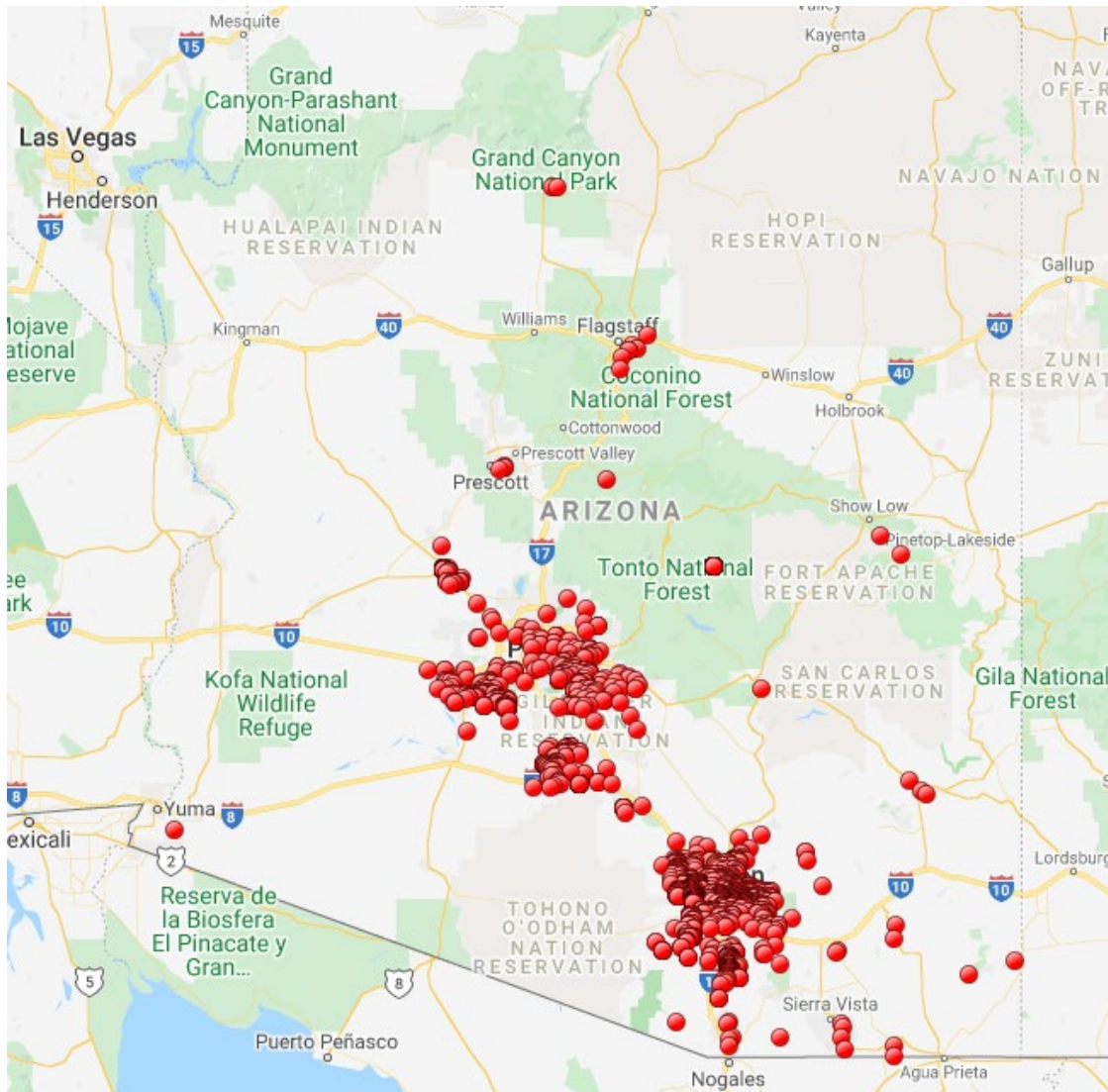
23 Note: The numbers above are a general representation and reflect the number of comment entries in the comment database. These
24 may not match the number of responses in **Appendix H** (Comments on Draft Tier I EIS and Responses) because some comments
25 were submitted more than once.

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Table 5-3. Form of Comments

| Form | Number of Comments Received |
|---|-----------------------------|
| Website (http://i11study.com/Arizona/Documents.asp) | 2,608 |
| Handwritten | 43 |
| Oral Testimony (at Public Hearings) | 248 |
| Email | 9,166 |
| Other | 33 |
| Phone | 252 |
| Mail | 95 |
| Total | 12,445 |

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Figure 5-1. Distribution of Public Comments Originating in Arizona

1 Each section of **Chapter 3** (Affected Environment and Environmental Consequences)
 2 summarizes comments relating to specific resources (e.g., air quality). **Chapter 4** (Draft
 3 Preliminary Section 4(f) Evaluation) summarizes comments to the Section 4(f) Evaluation.
 4 **Chapter 6** (Preferred Alternative) summarizes comments related to alternatives.

5 All comments received during the April 5 through July 8, 2019, comment period are addressed
 6 in **Appendix H** (Comments on Draft Tier I EIS and Responses) of this Final Tier 1 EIS. Several
 7 agencies submitted letters outside of the official comment period containing supplementary
 8 information or additional comments on the Draft Tier 1 EIS. Those comment letters are also
 9 included in **Appendix H**.

10 5.5 Coordination and Outreach Since Draft Tier 1 EIS

11 Following the close of the Draft Tier 1 EIS public comment period on July 8, 2019, the Project
 12 Team focused its efforts on reviewing and understanding comments. The Project Team
 13 continued to accept input and meet with agency partners.

14 **Agency:** Agency outreach and coordination following the formal comment period for the Draft
 15 Tier 1 EIS included one-on-one meetings with agency stakeholders so that FHWA and ADOT
 16 could gain a better understanding of comments and potential solutions to address concerns, as
 17 well as recurring cooperating agency, project management team, and executive leadership
 18 team meetings. **Table 5-4** lists the agency coordination opportunities after the publication of the
 19 Draft Tier 1 EIS to the present.

20 **Table 5-4. Agency Coordination Opportunities**

| Agency Coordination | Dates | Purpose and Outcomes |
|---|--|--|
| Cooperating Agency Meetings | Monthly, July 2019 – present | Convene FHWA, ADOT, and cooperating agencies to discuss project status, coordinate on related projects or pertinent issues, and review draft project materials |
| Cooperating Agency Comment Discussion Meetings | August 2019 | Convene FHWA, ADOT, and cooperating agencies to discuss agency comments on the Draft Tier 1 EIS |
| Cooperating Agency Review of Administrative Final EIS | January – February 2021 | Cooperating agencies were provided the opportunity to review and comment on the administrative draft of the Final Tier 1 EIS |
| Project Management Team Meetings | Every other month, July 2019 - present | Convene FHWA, ADOT, and metropolitan planning organizations to discuss project status and coordinate on related projects or pertinent issues |
| Executive Leadership Team | Quarterly (as-needed), July 2019 – present | Executive-level meetings to discuss project status, upcoming outreach activities, and outstanding issues among FHWA, ADOT, and metropolitan planning organization leadership |

| Agency Coordination | Dates | Purpose and Outcomes |
|----------------------------|---------------------------|---|
| Individual Agency Meetings | Throughout entire process | Individual meetings with individual agencies or tribes as requested or in response to project issues. |

1

2 **Tribal:** Tribal coordination meetings generally included elected officials and staff members from
 3 transportation, community development, agriculture and natural resources, planning and zoning,
 4 and/or economic development. **Table 5-5** lists the major points of tribal coordination that
 5 occurred between January 2019 and September 2020.

6

Table 5-5. Tribal Engagement (2019–2020)

| Date | Engagement Activity | Outcome/Activity |
|-------------------|--|--|
| May 9, 2019 | Coordination meeting with the Four Southern Tribes | Overview of the Draft Tier 1 EIS public review period, public hearings, and materials available for review |
| October 3, 2019 | Coordination meeting with Colorado River Indian Tribes | General overview of the I-11 project |
| November 26, 2019 | Coordination meeting with Pascua Yaqui Tribe | General overview of the I-11 project |
| December 3, 2019 | Coordination meeting with Tohono O'odham Tribe San Xavier District | General overview of the I-11 project |
| December 11, 2019 | Fort Yuma Quechan Tribe | General overview of the I-11 project |
| January 9, 2020 | Government-to-government consultation with Colorado River Indian Tribes | Government-to-government consultation |
| February 11, 2020 | Tohono O'odham Sif Oidak District | General overview of the I-11 project |
| February 12, 2020 | Tohono O'odham Agriculture/Natural Resources Committee – TON Legislative Council | General overview of the I-11 project |
| March 2021 | Letter sent to 22 tribes | General I-11 update and request for input on public involvement opportunities during public review period for the Final Tier 1 EIS |
| June 2021 | Coordination meeting with the Four Southern Tribes | Overview of I-11 project and Final Tier 1 EIS status |

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5.6 Next Steps and Final Tier 1 EIS Public Review Process

8 This Final Tier 1 EIS will be available for a 30-day review period for federal, state, local
 9 agencies and private organizations, and members of the public who provided substantive
 10 comments on the Draft Tier 1 EIS (23 CFR 771.125(f)). Outreach efforts for the Final Tier 1 EIS
 11 will include publication of a Notice of Availability in the Federal Register and local newspapers
 12 (23 CFR 771.125(f)), news releases, GovDelivery (email) notices, notification letters to
 13 Cooperating and Participating Agencies, and notice on the study website. Comments will be
 14 collected, but public hearings will not be held. FHWA and ADOT will publish a Record of



- 1 Decision no sooner than 30 days after publication of the Final Tier 1 EIS. The Record of
- 2 Decision will present a Selected Alternative, describe the basis for the decision, and list
- 3 mitigation measures that ADOT has committed to implement during Tier 2 studies if a Build
- 4 Corridor Alternative is chosen.

- 5 If a Build Corridor Alternative is selected, it would be further evaluated and refined during Tier 2
- 6 analyses. Tier 2 environmental studies will be conducted in accordance with NEPA and related
- 7 environmental statutes and regulations, including any requirements for agency coordination and
- 8 public review. Continuing coordination with tribes, the public, and agencies would occur prior to
- 9 and during Tier 2 project-level analyses.

10