

I-81 VIADUCT PROJECT
CHAPTER 9
AGENCY COORDINATION AND
PUBLIC OUTREACH

This chapter summarizes the agency and public involvement that has been and will be conducted for the I-81 Viaduct Project.

9.1 INTRODUCTION

Agency and public involvement are an integral part of the transportation and project development processes. Accordingly, the Federal Highway Administration (FHWA) and New York State Department of Transportation (NYSDOT) have provided, and will continue to provide, many opportunities for open, collaborative, and meaningful agency and public participation throughout the environmental review process for the I-81 Viaduct Project (“the Project”).

The agency and public participation efforts for the Project have been developed in compliance with legislation and policies that guide public involvement in project development, including, but not limited to, the following:

- **National Environmental Policy Act of 1969 (NEPA)**, which requires Federal agencies to conduct the environmental review process in coordination with the public and other agencies;
- **State Environmental Quality Review Act (SEQRA)**, which requires New York State agencies to conduct the environmental review process in coordination with the public and other agencies;
- **Moving Ahead for Progress in the 21st Century (MAP-21)¹ Act of 2012**, the Federal transportation reauthorization law, which carries forward the public involvement principles of the Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users (SAFETEA-LU) of 2005;
- **Section 106 of the National Historic Preservation Act (NHPA) of 1966**, which requires that Federal agencies consider the effects of their undertakings on properties listed on or eligible for listing on the National Register of Historic Places. This consideration includes consultation with the State Historic Preservation Office (SHPO), the Advisory Council on Historic Preservation (ACHP), Federally recognized Native Nations, and agencies, individuals, and organizations with a demonstrated interest in the Project and its potential effects on properties of historic interest (i.e., Consulting Parties);

¹ On December 4, 2015, the Fixing America’s Surface Transportation (FAST) Act was signed into law. The FAST Act builds upon and carries forward the public involvement principles of the MAP-21 and SAFETEA-LU. Since the Notice of Intent to prepare an Environmental Impact Statement (EIS) for the I-81 Viaduct Project was published in the Federal Register on August 26, 2013, prior to the FAST Act, this EIS will remain compliant with MAP-21.

- **Environmental Justice.** Executive Order 12898, “Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations,” February 16, 1994 (59 CFR Part 7629), directs Federal agencies to take appropriate and necessary steps to identify and address disproportionately high and adverse effects of Federal projects on the health or environment of minority and low-income populations to the greatest extent practicable and permitted by law. U.S. Department of Transportation (USDOT) Order 5610.2c, published May 2021, sets forth the USDOT policy to consider environmental justice principles in all USDOT programs, policies, and activities; and FHWA Order 6640.23A, June 14, 2012, establishes policies and procedures to ensure meaningful opportunities for access to public information and public participation from communities with minority or low-income populations;
- **Title VI of the Civil Rights Act of 1964** and the Title VI regulations prohibiting discrimination based on race, color, and national origin;
- **Executive Order 13166 and Executive Order 26.** Executive Order 13166, “Improving Access to Services for Persons with Limited English Proficiency [LEP],” states that people with LEP should have meaningful access to Federally conducted and Federally funded programs and activities. Executive Order 26, “Statewide Language Access Policy,” directs executive state agencies that provide direct public services to offer language assistance services (translation and interpretation) to people with LEP;
- **Uniform Relocation and Assistance and Real Property Acquisition Policies Act of 1970,** the Surface Transportation and Uniform Relocation Assistance Act of 1987, and the New York State Eminent Domain Procedures Law, which outline the requirements for property acquisition, including targeted outreach to affected property owners; and
- **Section 4(f) of the USDOT Act of 1966,** which requires coordination with the public and officials with jurisdiction for the potential transportation use of properties protected under this Act.

9.2 AGENCY AND PUBLIC INVOLVEMENT REQUIREMENTS

9.2.1 COORDINATION PLAN

Section 6002 of SAFETEA-LU increased opportunities for the public and Federal, State, and local agencies to have active and early involvement in the NEPA process and to provide input on a project’s purpose and need, environmental study methodology, and alternatives under consideration. Section 6002 and 23 USC 139 require the development of a Coordination Plan for all highway and transit projects for which an Environmental Impact Statement (EIS) is being prepared under NEPA. Accordingly, FHWA, the Federal Lead Agency, and NYSDOT, the Joint Lead Agency, prepared a Coordination Plan to describe the process and communication methods followed to disseminate information about the I-81 Viaduct Project, as well as to solicit and consider input from the public and other agencies.

The Coordination Plan for the Project conforms to the requirements of NEPA and specifically complies with the requirements described above. The Coordination Plan has and will continue to be in effect throughout the environmental review process, beginning with the issuance of the Notice of

Intent (NOI) to prepare an EIS for the Project and ending with the Record of Decision (ROD). The plan is a flexible, “living” document that can be amended as needed during the Project environmental review process. The Coordination Plan has been posted to the Project website, www.dot.ny.gov/i81opportunities,² and has been updated as needed (refer to Section 5, Revision History, of the plan for a summary of the revisions).

9.2.2 COOPERATING AND PARTICIPATING AGENCIES

In accordance with the Coordination Plan, FHWA and NYSDOT have identified and invited the appropriate agencies to serve as Cooperating and/or Participating Agencies for the I-81 Viaduct Project. Cooperating and Participating Agencies are responsible for identifying, as early as practicable, any issues of concern regarding the Project’s potential environmental or socioeconomic effects that could substantially delay or prevent an agency from granting a permit or other approval.

According to Council on Environmental Quality (CEQ) Regulations for Implementing NEPA (40 CFR 1508.5), a “Cooperating Agency” means any Federal agency, other than a lead agency, that has jurisdiction by law or special expertise with respect to any environmental impact involved in a proposed project or project alternative. A state or local agency of similar qualifications or, when the effects are on lands of interest to a Native Nation, a Native Nation may, by agreement with the lead agencies, also become a Cooperating Agency. CEQ also states (40 CFR 1501.6) that an agency may request that the lead agency designate it as a Cooperating Agency.

“Participating Agencies” are those with an interest in the project. The standard for Participating Agency status is more encompassing than the standard for Cooperating Agency status described above. Therefore, Cooperating Agencies are, by definition, Participating Agencies, but not all Participating Agencies are Cooperating Agencies. The FHWA and NYSDOT considered the distinctions in deciding whether to invite an agency to serve as a Cooperating/Participating Agency or only as a Participating Agency.

The roles and responsibilities of Cooperating and Participating Agencies are similar, but Cooperating Agencies have a higher degree of authority, responsibility, and involvement in the environmental review process. A Cooperating Agency with jurisdiction may adopt without re-circulating the EIS of a lead agency when, after an independent review of the statement, the Cooperating Agency concludes that its comments and suggestions have been satisfied. This provision is particularly important to permitting agencies that, as Cooperating Agencies, may adopt USDOT environmental documents.

Cooperating and Participating Agencies have been and will continue to be asked to submit comments during the EIS process that summarize their jurisdiction and/or special expertise related to the Project. FHWA and NYSDOT have collaborated with Cooperating and Participating Agencies in defining the Project’s purpose and need, range of alternatives, and methodologies for documenting environmental conditions and assessing effects.

Table 9-1 lists the agencies that were invited to be involved in the Project, their role, and the reason for their requested involvement and particular responsibilities. For the I-81 Viaduct Project, certain

² <https://www.dot.ny.gov/i81opportunities>. Accessed January 1, 2020.

I-81 VIADUCT PROJECT

transportation companies were invited as Participating Agencies since they have assets in the Project Area that could be affected by Project elements.

Table 9-1
List of Invited Cooperating and Participating Agencies

Agency	Role	Involvement
Advisory Council on Historic Preservation	Cooperating Agency	Section 106, National Historic Preservation Act; Section 4(f), U.S. Department of Transportation Act
U.S. Army Corps of Engineers (USACE)	Cooperating Agency	Section 404, Clean Water Act permit
U.S. Environmental Protection Agency (USEPA)	Cooperating Agency	Section 309, Clean Air Act Section 404, Clean Water Act Executive Order 11990, Protection of Wetlands
U.S. Fish and Wildlife Service*	Cooperating Agency	Section 7, Endangered Species Act
New York State Department of Environmental Conservation (NYSDEC)	Cooperating Agency	New York State environmental permits
New York State Office of Parks, Recreation and Historic Preservation—State Historic Preservation Office (SHPO)	Cooperating Agency	Section 106, National Historic Preservation Act; Section 4(f), U.S. Department of Transportation Act
Onondaga Nation	Participating Agency	Federally recognized Native Nation; Section 106, National Historic Preservation Act Consultation Executive Order 13175 – Consultation and Coordination with Indian Tribal Governments Presidential Memorandum on Tribal Consultation USDOT Order 5301.1 – Department of Transportation Programs, Policies, and Procedures Affecting American Indians, Alaska Natives, and Tribes
Tuscarora Nation***	Participating Agency	Federally recognized Native Nation; Section 106, National Historic Preservation Act Consultation Executive Order 13175 – Consultation and Coordination with Indian Tribal Governments Presidential Memorandum on Tribal Consultation USDOT Order 5301.1 – Department of Transportation Programs, Policies, and Procedures Affecting American Indians, Alaska Natives, and Tribes
Syracuse Metropolitan Transportation Council	Participating Agency	Metropolitan Planning Organization; Consultation
CNY Centro, Inc.	Participating Agency	Central New York Regional Transportation Authority; Consultation
New York, Susquehanna and Western Railway	Participating Agency	Railroad in Project Area; Consultation
CSX**	Participating Agency	Railroad in Project Area; Consultation

I-81 VIADUCT PROJECT

Table 9-1 (cont'd)
List of Invited Cooperating and Participating Agencies

Agency	Role	Involvement
Onondaga County	Participating Agency	Project county; Consultation
City of Syracuse	Participating Agency	Project city; Consultation
Town of Cicero	Participating Agency	Adjacent municipality; Consultation
Town of DeWitt	Participating Agency	Adjacent municipality; Consultation
Town of Salina	Participating Agency	Adjacent municipality; Consultation
Village of East Syracuse	Participating Agency	Adjacent municipality; Consultation
Village of North Syracuse	Participating Agency	Adjacent municipality; Consultation
Notes: * USFWS declined the invitation to participate as a Cooperating Agency for the Project (Fall 2013). ** FHWA did not receive a response from CSX accepting or declining the invitation to participate as a Participating Agency for the Project. *** In December 2017 NYSDOT was notified by FHWA that the Tuscarora Nation added Onondaga County to their area of interest and therefore, on September 13, 2018 the Tuscarora Nation was invited to become a Participating Agency.		

An initial Cooperating Agency meeting was held on October 31, 2013 at the NYSDOT Main Office in Albany, New York. Between May 2014 and April 2018, monthly teleconferences were typically held with the Cooperating Agencies. Thereafter, teleconference calls occurred on an as-needed basis. During the calls, NYSDOT updated the agencies on the progress of the Project and environmental analyses, recent and upcoming outreach activities, and the overall Project schedule. Agencies were asked for input and given an opportunity to ask questions of the Project team. In addition, a Cooperating Agency bus tour of the Project Area was conducted on July 13, 2016. An initial Participating Agency meeting was held on June 4, 2014 at the NYSDOT Region 3 office in Syracuse. NYSDOT presented a Project overview and discussed the development of alternatives and the schedule for public outreach activities. An additional meeting was held on August 6, 2021 during the public review of the Draft Design Report/Draft Environmental Impact Statement (DDR/DEIS).

Meetings were held with the USACE and NYSDEC on April 27, 2017 and October 25, 2017 to discuss potential effects on natural resources and on November 9, 2017 to discuss wetland mitigation. A meeting was held with USEPA on May 23, 2017 to discuss potential effects of the Project. Meetings with NYSDEC to update staff on the Project status were held on August 15, 2019 (to coordinate with the agency after the publication of the preliminary DDR/DEIS and discuss approach to water resources impacts), October 24, 2019 (on proposed stormwater management and treatment), and December 13, 2019 (to discuss how the stormwater improvements planned as part of the Project could enhance Onondaga County's ability to address its combined sewer overflow issues). In addition, meetings were held with NYSDEC and the Onondaga County Department of Water Environment Protection on February 12, 2020, May 11, 2020, August 26, 2020, August 2, 2021, and November 23, 2021 to discuss the Project's proposed trunk storm sewer and the opportunities it would provide to Onondaga County and the City of Syracuse to improve water quality and separate storm water in the Project Area. On February 7, 2022 and February 23, 2022, FHWA and NYSDOT held meetings with NYSDEC and USACE, respectively, to discuss next steps for the forthcoming permits.

The methodology used to initially identify wetlands within the Project Area was coordinated with USACE and NYSDEC and is documented in Appendices J and M. NYSDOT has submitted a formal

wetlands delineation report to USACE and NYSDEC along with a request for their concurrence on the jurisdictional findings.

FHWA and NYSDOT provided USACE, USEPA, and NYSDEC with a working draft of a preliminary DDR/DEIS in early 2017 for initial review and comment. The Cooperating and Participating Agencies were notified of the availability of the preliminary DDR/DEIS that was published in April 2019 and of the official DDR/DEIS, which was published in July 2021. They will be notified of the availability of this FDR/FEIS and given appropriate comment opportunities.

A wetland delineation report is under review by the USACE and NYSDEC along with a request for jurisdictional determination. Following the ROD, coordination with the appropriate agencies would continue to complete any necessary permits for the Project.

9.2.3 SECTION 106 OF THE NATIONAL HISTORIC PRESERVATION ACT CONSULTATION

Section 106 of the National Historic Preservation Act (36 CFR Part 800) requires Federal agencies to take into account the effects of their undertakings on historic properties that are listed or meet the eligibility criteria for listing in the National Register of Historic Places. Section 106 includes a public participation component. The process includes providing Consulting Parties and the public with information about the Project and its effects on historic properties and seeking public comment and input. This requirement is being satisfied in coordination with the public involvement requirements pursuant to NEPA.

Members of the public with a demonstrated interest in the Project (due to the nature of their legal or economic relation to the undertaking or affected properties, or their concern with the undertaking's effects on historic properties) may participate as Consulting Parties. For the I-81 Viaduct Project, NYSDOT, on behalf of FHWA, sent letters to the Federally recognized Native Nations (the Onondaga and Tuscarora Nations), public agencies, preservation groups, and other stakeholders to invite them to participate as Consulting Parties. A public notice, in English and Spanish, was published in local newspapers to invite parties with a demonstrated interest to apply for Consulting Party status. Copies of *A Citizen's Guide to Section 106 Review*, published by the ACHP, applications for Consulting Party status, and other information about the Section 106 process were available at public meetings, on the Project website, and at the Project Outreach Center. Through these means, parties expressed interest to serve as Consulting Parties. FHWA and NYSDOT coordinated to identify, accept, and notify interested parties of their status as Section 106 Consulting Parties. **Table 9-2** identifies the Consulting Parties for the Project.

Consulting Parties meetings took place on June 29, 2016, August 12, 2019, and March 31, 2021. A meeting and site visit of the Project Area with the Onondaga Nation and SHPO was conducted on July 13, 2016. Briefings were also held with the Onondaga Nation and SHPO on October 7, 2016 and June 13, 2017. NYSDOT was notified in December 2017 by FHWA that the Tuscarora Nation added Onondaga County to their area of interest and therefore on September 13, 2018 the Tuscarora Nation was invited to become a Participating Agency and a Consulting Party for Section 106 consultation. FHWA and NYSDOT held a meeting with the Onondaga Nation on August 12, 2019. The Tuscarora Nation was invited to participate but did not respond to the invitation. The Tuscarora Nation later deferred their Section 106 consultation status on the Project to the Onondaga Nation via

I-81 VIADUCT PROJECT

correspondence to FHWA on March 8, 2021. Additional Native Nation consultation meetings were held between the Onondaga Nation, the FHWA, and the NYSDOT on January 20, 2021 and between the Onondaga Nation and the FHWA on April 14, 2021. FHWA and NYSDOT held working group meetings to develop the Section 106 Programmatic Agreement in consultation with representatives from the SHPO, ACHP, and the Onondaga Nation on April 27, 2021, June 22, 2021, July 8, 2021, July 20, 2021, November 30, 2021, January 18, 2022, and March 3, 2022.

Table 9-2
Section 106 Consulting Parties

Organization
New York State Office of Parks, Recreation and Historic Preservation—State Historic Preservation Office (SHPO)
Onondaga Nation
Tuscarora Nation
City of Syracuse
Syracuse-Onondaga County Planning Agency
Syracuse Housing Authority
Syracuse Metropolitan Transportation Council
Town of DeWitt Historical Preservation Society
Preservation League of New York State
Downtown Committee of Syracuse
Preservation Association of Central New York
AIA Central New York Chapter of the American Institute of Architects
Central New York Regional Planning and Development Board
The Erie Canal Museum
The Northside Urban Partnership
Northeast Hawley Development Association, Inc.
Michael La Flair, acting on behalf of Housing Visions
Quante Wright
Douglas Armstrong
Historic Oakwood Cemetery Preservation Association

9.2.4 SECTION 4(f) OF THE USDOT ACT OF 1966 COORDINATION

In accordance with 23 CFR § 774.5, FHWA must provide opportunities for coordination and comment to the official(s) with jurisdiction over any Section 4(f) resource that may be affected by the Project as well as to the U.S. Department of the Interior (DOI), and potentially, the Department of Agriculture and the Department of Housing and Urban Development. Resources protected under Section 4(f) include public parks, wildlife refuges, and historic resources. Section 4(f) prohibits FHWA from approving the use of any Section 4(f) resource for a transportation project, except under the following conditions:

- There is no feasible and prudent alternative that would avoid the use of the Section 4(f) resource, and
- The project includes all possible planning to minimize harm to that property (23 CFR 774.3(a)).

Chapter 7, Final Section 4(f) Evaluation, identifies and describes the potential use of Section 4(f) properties as a result of the Project. The Project would require the temporary occupancy of a 0.12-acre section of Wilson Park, a two-acre neighborhood park that is protected under Section 4(f), during construction. The park is located on the block bordered by South McBride Street, East Taylor Street, Almond Street and the I-81 viaduct, and Jackson Street. NYSDOT coordinated with representatives of the agencies with jurisdiction over Wilson Park (City of Syracuse, Department of Parks, Recreation and Youth Programs, as well as Syracuse Housing Authority) to identify measures to minimize harm. Meetings were held on January 30, 2017, February 16, 2017, and May 8, 2017 to identify potential improvements that could be made to the park. NYSDOT developed potential park improvement options and provided them to the officials with jurisdiction. The City of Syracuse recommended a preferred option in correspondence dated July 27, 2017 and the Syracuse Housing Authority recommended the same preferred option in correspondence dated September 11, 2017. Letters were sent in November 2021 to the City of Syracuse Department of Parks, Recreation, and Youth Programs and to the Syracuse Housing Authority requesting concurrence that the Community Grid Alternative would not adversely affect the activities, features, or attributes that make the property eligible for Section 4(f) protection once proposed measures to minimize harm have been incorporated. NYSDOT received letters from the City of Syracuse Department of Parks, Recreation and Youth Programs (January 31, 2022) and the Syracuse Housing Authority (February 2, 2022) indicating that they concurred that the proposed use of land from Wilson Park is unavoidable; and that the Community Grid Alternative includes reasonable measures for minimizing and mitigating impacts, and would cause the least harm to the activities, features, and attributes that qualify the property for protection under Section 4(f) of the U.S. Department of Transportation Act. The proposed park improvements are described in **Chapter 7, Final Section 4(f) Evaluation**. Correspondence with the officials with jurisdiction are included in **Appendix N**.

Section 4(f) also requires coordination with SHPO as there would be a use of historic resources for implementation of the Viaduct Alternative. The coordination with SHPO was undertaken pursuant to the Section 106 process, as described in **Section 9.2.3**.

9.2.5 EXECUTIVE ORDER 12898, ENVIRONMENTAL JUSTICE

Executive Order 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations, dated February 16, 1994, requires consideration of whether a proposed action would disproportionately and adversely affect prescribed minority or low-income groups (59 Fed Reg. 7629 [1994]). An environmental justice analysis was prepared for the Project to identify and address disproportionately high and adverse effects to environmental justice populations (see **Section 6-2-3, Environmental Justice**, which also provides information on the analysis methodology). Executive Order 12898 also requires Federal agencies to ensure public participation from communities with minority or low-income populations. FHWA and NYSDOT are committed to developing and using public engagement to encourage environmental justice populations to participate meaningfully from the earliest stages of the Project through its implementation.

The “I-81 Viaduct Project Memo on Limited English Proficiency Analysis and Approach” (see **Appendix M-3**) and the Syracuse Metropolitan Transportation Council’s *Environmental Justice Analysis Syracuse Metropolitan Planning Area Final Report July 2012*, which identified environmental justice populations, were used as early references in the public outreach program; the latter was used to

determine locations for the neighborhood meetings, described below. In addition to the technical analysis to identify environmental justice populations, local community leaders and community-based organizations (CBOs) were consulted for suggestions on how to engage additional traditionally underrepresented groups and where to hold meetings. These groups include people with limited English proficiency, elderly individuals, individuals with disabilities, transit-dependent individuals, Native American communities, and immigrant and refugee communities.

A fundamental principle of environmental justice is to identify and prevent discriminatory effects by ensuring that social impacts to communities and people are recognized early and continually through enhanced engagement and meaningful input. FHWA and NYSDOT began their proactive efforts to ensure meaningful opportunities for public participation shortly after the NOI in August 2013, hosting a series of meetings in neighborhoods with environmental justice populations in September and October of 2013. NYSDOT provided a Project status and introduction at each neighborhood meeting, explained the scoping process, and encouraged the participation of attendees at the upcoming scoping meetings. Additional neighborhood meetings are described below.

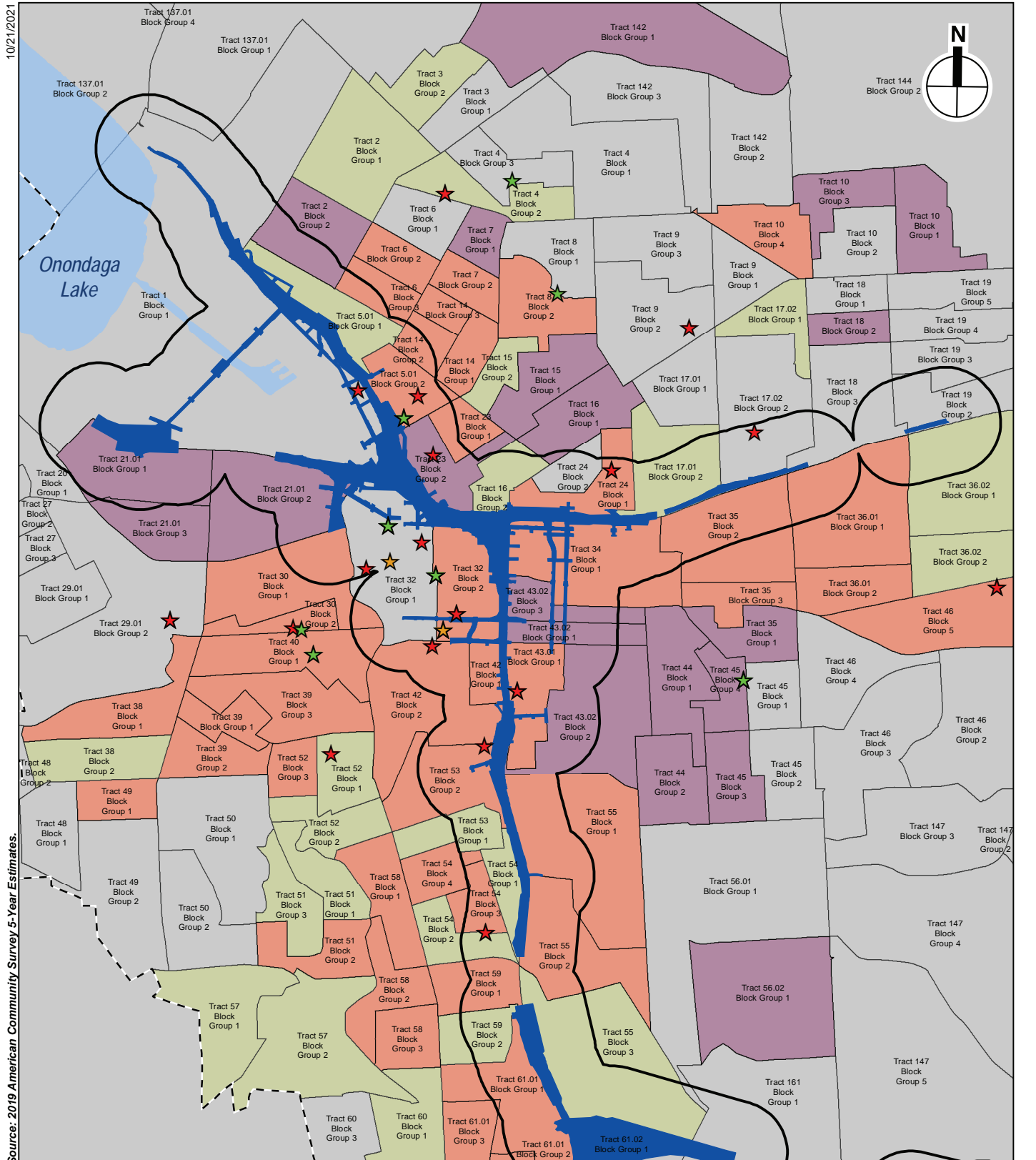
Both large-format meetings such as the open house and small-format meetings such as the neighborhood meetings were held. There were also one-on-one meetings with community leaders, institutions, and advocates that work with, and residents that live in, identified environmental justice communities (see **Section 6-2-3, Environmental Justice**). Non-traditional methods (e.g., outreach at local festivals, Project team attendance at English as a Second Language [ESL] classes) have also been employed. **Figure 9-1** shows the locations of select public meetings, and **Appendix M-1** lists the date, parties, subject, and location of these meetings.

9.2.6 OUTREACH TO LEP INDIVIDUALS

Individuals who do not speak English as their primary language and who have a limited ability to read, speak, write, or understand English are considered “limited English proficient,” or LEP. Federal laws concerning language access rights and obligations include Title VI of the Civil Rights Act of 1964 and Executive Order 13166. Executive Order 13166, “Improving Access to Services for Persons with Limited English Proficiency,” was signed on August 11, 2000 and states that people with limited English proficiency should have meaningful access to Federally conducted and funded programs and activities. The Executive Order requires Federal agencies to examine the services they provide, identify any need for services to LEP individuals, and develop and implement a system to provide those services that allows for meaningful access by LEP individuals. This order references Title VI and is also relevant to environmental justice because some minorities may not speak English as a first language.

The data and plan to guide the involvement of LEP populations are summarized in the “I-81 Viaduct Project Memo on LEP Analysis and Approach” (July 2014), which is included in **Appendix M-3**. Contact was made with representatives of organizations serving LEP populations to better understand their needs and best ways to engage them in the EIS process. These organizations include:

- Catholic Youth Organization (Catholic Charities) – Citizenship program
- Spanish Action League
- Syracuse City School District – English Second Language program



Source: 2019 American Community Survey 5-Year Estimates.

- Project Limits
- Study Area (1/4-Mile Boundary)
- Environmental Justice Study Area
- Area

- ★ Community Event/ Festival/ LEP Outreach Location
- ★ Major Public Meeting Location
- ★ Neighborhood and Community Meeting Location

- Minority Community
- Low-Income Community
- Minority and Low-Income Community

Note: See Table M-1-2 for list of select meeting locations depicted here.

Select Meeting Locations Central Study Area
Figure 9-1

I-81 VIADUCT PROJECT

- Syracuse University, Geography Department
- SUNY Upstate, Director of Interpreter Services
- Syracuse University, Chinese Students & Scholars Association

In addition, demographic data collected from the U.S. Census Bureau, 2008-2012 American Community Survey (ACS), were reviewed to identify the primary language(s) other than English spoken in the Project Area with the goal of providing interpretation services if needed and appropriate for LEP individuals. Based on this review, as shown in **Table 9-3**, the primary language other than English spoken in the Project Area is Spanish.

Table 9-3

Common Language Groups for LEP Populations within the Project Area

	LEP Population	Percentage (%) of Project Area LEP
Total Project Area	11,178	100%
Spanish	3,485	31%
Chinese	1,213	11%
African languages	842	8%
Other Indic languages*	733	7%
Vietnamese	676	6%
Other Asian languages**	611	6%
Serbo-Croatian	573	5%
Notes: * Other Indic languages cover those other than Hindi, Urdu, and Gujarati. ** Other Asian languages cover those other than Chinese, Japanese, Korean, Mon-Khmer/Cambodian, Hmong, Thai, Laotian, and Vietnamese. Source: U.S. Census Bureau, 2008-2012 American Community Survey.		

Based on a review of the most recent (2015-2019) ACS data, Spanish continues to be the primary language other than English spoken in the Project Area. As shown in **Table 9-4**, the 2015-2019 ACS estimates 11,814 LEP individuals within the study area, an increase of 636 people compared with the 2008-2012 ACS estimates. Between the two surveys, the estimate of LEP individuals who speak Spanish decreased by 574 to 2,911 people, representing 25 percent of the study area LEP population.

Table 9-4

**Common Language Groups for LEP Populations within the Project Area
(2015-2019 American Community Survey Data)**

	LEP Population	Percentage (%) of Project Area LEP
Total Project Area	11,814	100%
Spanish	2,911	25%
Asian and Pacific Island Languages*	3,856	32%
Indo-European Languages**	3,032	26%
Other Languages	2,015	17%
Notes: * Includes Chinese, Korean, Tagalog, Vietnamese, and all other Asian and Pacific Island languages. ** Includes French, German, Polish, and all other Indo-European languages, excluding Spanish. Source: U.S. Census Bureau, 2015-2019 American Community Survey, B16004.		

Other than Spanish, the 2015-2019 survey does not provide study area estimates for specific languages spoken by LEP individuals. The 2015-2019 survey estimates 3,856 LEP individuals speak Asian and Pacific Languages and 3,032 speak Indo-European Languages (other than Spanish). Each language grouping comprises dozens of individual languages and includes specific languages shown in the 2008-2012 data. Therefore, while the newer ACS data shows Asian and Pacific Island Languages as the predominant language group, Spanish is still the most frequently spoken language in the Project Area other than English.

A “language line” service, which provides on-demand interpretation via telephone for numerous other languages, was available at the scoping meetings, open houses, and public hearings. In addition, meeting advertisements offered attendees an opportunity to request interpretation services for other languages. Spanish interpreters were available at the scoping meetings, the open houses, the public hearings, and the Stakeholders’ Committee meetings. Spanish interpreters (and in one neighborhood, a Mandarin Chinese interpreter) were available at the neighborhood meetings.

Meetings were advertised through translated flyers and e-flyers and translated advertisements published in CNY Latino, a local Spanish-language newspaper. Comment sheets in Spanish and English were distributed at meetings and other public events. In addition, Project materials, including meeting notices, meeting directional signs, a sign identifying the availability of an interpreter, job opportunities information, and a Project information card (with information about the Project Outreach Center, Project website, and toll-free hotline) also have been provided in Spanish and English.

Spanish-speaking Project team members and a Spanish interpreter staffed an informational booth in the Central New York Festival Latino-Americano (held in the Westside or Downtown) in August 2015, 2016, 2017, 2018, and 2019 and at La Feria held at The Great New York State Fair in August 2017, 2018, 2019, and 2021. In addition, Project staff presented at English language and citizenship classes to provide Project-related information and answer questions of LEP individuals. Meeting dates, locations, and summary of that outreach is provided in **Appendix M-1**. Other outreach included the distribution of flyers (e.g., to notify those with LEP of public meetings) at religious institutions, cultural centers, and community centers. Prior to Project meetings, for example, flyers and posters

providing meeting notifications, in English and Spanish, as well as other information, were distributed to appropriate organizations and meeting places. Project materials and meeting notifications continue to be distributed to these centers to help inform the public about the Project and encourage public participation.

In addition to the efforts described above, the Project website, www.dot.ny.gov/i81opportunities, includes “Language Assistance” links in Spanish, Chinese, Haitian Creole, Bengali, Italian, Polish, Arabic, Korean, Russian, and Yiddish; these links provide LEP individuals with additional information regarding their rights under Title VI of the Civil Rights Act of 1964.

9.2.7 AMERICANS WITH DISABILITIES ACT OUTREACH

Public meetings have been and will continue to be held in locations that comply with the Americans with Disabilities Act (ADA) to assure that individuals with disabilities and/or who are elderly have convenient access to meetings. Public notices announcing public meetings provide instructions for requesting other special accommodations. In addition, as noted below, Toomey Abbott Towers, an ADA-accessible assisted living facility, was chosen as a meeting site to bring Project information to a population with limited mobility, and NYSDOT coordinated with the Syracuse Housing Authority to provide persons with limited mobility with transportation to the Project scoping and other major public meetings.

9.2.8 MEETINGS WITH POTENTIALLY AFFECTED PROPERTY OWNERS

The New York State Eminent Domain Procedure Law, or EDPL, seeks to establish the exclusive procedure by which property is acquired in New York State, ensure just compensation is paid, and establish opportunities for public participation in the planning of projects necessitating the exercise of eminent domain (see **Section 6.3.1** for additional information). Pursuant to EDPL Section 206 (C), the public hearing on the DDR/DEIS (described in **Section 9.3.1** below) satisfied the EDPL public hearing requirements by including notice to the public and owners of property to be acquired and meeting the requirements of EDPL Section 204 (B). The hearing included both in-person and virtual components.

In September 2016, NYSDOT corresponded and met with individuals who were preliminarily identified as owners of buildings that may need to be acquired under the Project’s two build alternatives. During those meetings, the owners were presented with information regarding their particular site as well as written materials describing the acquisition process and the assistance available to both owners and tenants. Building owners were also sent a written invitation to attend an upcoming open house on the Project (held on October 6, 2016) and given further opportunity to meet with NYSDOT to discuss the potential impacts to their buildings. Additional meetings with property owners have taken place as needed.

Prior to the meetings with affected building owners described above, three meetings were held to provide an overview of the property acquisition process, relocation assistance program, and the notification process to the general public. The meetings were held on June 1 and June 2, 2016 at the Boys and Girls Club of Syracuse, the Project Outreach Center, and Assumption Parish Center. Comment sheets were available, and Project representatives were on hand to respond to questions.

9.3 AGENCY AND PUBLIC INVOLVEMENT ACTIVITIES

FHWA and NYSDOT are committed to an open, participatory environmental review process for the Project and will continue to inform and solicit early and frequent feedback from the public and from agencies; encourage open discussion of Project details and issues; and provide opportunities for comments and questions. Opportunities for public input have occurred and will continue to occur throughout the Project and include those described below.

9.3.1 PUBLIC MEETINGS AND OPEN HOUSES

Public meetings and open houses are an important tool to keep the general public informed of the Project and to solicit input. To encourage public participation in the environmental review process, major meetings have been and will be advertised and promoted in a variety of ways, including through the use of local media (print and on-line newspapers and local news broadcasts); postings on community message boards; coordination with local and regional civic organizations; postings on the Project website and social media accounts; use of direct mail/e-mail to the Project mailing list; notices on Centro buses; notices on variable message signs on I-81, I-690, and I-481; and distribution of meeting notices throughout the Downtown, Eastside, Northside, Southside, and Westside neighborhoods.

Public meetings and open houses that have been or will be held for the Project are described below.

- **Scoping Meetings.** Scoping meetings were held on November 13, 2013 and June 26, 2014 at the Oncenter and were attended by approximately 400 and 450 people, respectively. These meetings provided early opportunities for FHWA and NYSDOT to disseminate information about the Project to agencies and the public and to receive feedback. Each scoping meeting consisted of an informal open house and a presentation, which was given twice during the meetings. The open house portion consisted of informational displays, with Project team members available to provide information about the Project and answer questions. Sign language services were provided. Spanish-language interpreters were available. In addition, services to provide over-the-phone language interpretation upon request were offered during both meetings; interpretation services were available in 250 languages at the November 2013 scoping meeting and 119 languages at the June 2014 scoping meeting. Substantive comments raised during the scoping comment period, which ended on September 2, 2014, were summarized and responded to in the *Scoping Report*, which was made publicly available in April 2015 at the Project repositories (listed in **Appendix M-2**) and posted to the Project website (see <https://www.dot.ny.gov/i81opportunities>).
- **Open Houses.** Open houses were held on October 6, 2016 and June 18, 2019 and attended by approximately 525 people and 826 people, respectively. The purpose of the open houses was to provide up-to-date information on the Project status and alternatives. The 2016 open house included numerous display boards, twenty- and fifty-scale plan view illustrations of the build alternatives, recorded and live presentations, a video on bicycle/pedestrian improvements, and videos of traffic simulations, which represented existing and future (year 2050) traffic conditions under the Viaduct and Community Grid Alternatives. The 2019 open house also included display boards and fifty-scale plan view illustrations of the alternatives, recorded and live presentations, and before-and-after views of the project alternatives.

Sign language services were provided. Spanish-language interpreters were available. In addition, services to provide over-the-phone language interpretation for 368 languages in 2016 and 56 languages in 2019 were offered upon request.

Both meetings were held at the Oncenter, which was selected because it is centrally located, transit-accessible, familiar to the community, and accessible to people with disabilities (i.e., compliant with ADA).

To encourage broad-based participation in the scoping meetings and open houses, NYSDOT employed the following techniques:

- NYSDOT provided transit and parking vouchers to meeting attendees.
- NYSDOT coordinated with Syracuse Housing Authority (SHA) to ensure that a shuttle service was provided to transport residents from SHA properties to the scoping meetings and open houses.
- Meetings were held over a five-hour period in the late afternoon and early evening to accommodate various work and other schedules.
- Project information was conveyed using a variety of presentation techniques. Meeting materials included display boards and maps; photographs and visualizations (photo renderings); and presentations, including recorded presentations that played on a loop and videos/3D animations (e.g., of simulated traffic conditions).
- Meetings included formal presentations as well as an open house format, providing opportunities for direct interaction with Project staff, who were available to explain material on display boards and answer individual questions.
- Attendees were provided the opportunity to submit written comments. At the scoping meetings, stenographers were present to transcribe oral comments, which could be given either publicly during the public hearing portions of the meetings or dictated, in private, to a stenographer. Stenographers were also available at the 2019 open house.

These techniques also were employed at the in-person public hearing on the DDR/DEIS, described below.

- **Public Hearing.** Virtual and in-person public hearings on the DDR/DEIS were held on August 17, 2021 (virtual) and August 18, 2021 (in person).

The virtual hearing was held using the Zoom webinar platform, which was accessible on hand-held smart devices (IOS and Android) as well as tablets, laptops, and desktops. It was also livestreamed through the NYSDOT's YouTube channel. There were 303 attendees: 210 via Zoom, three by phone, and 90 through the livestream. The hearing was conducted in English with Spanish and American Sign Language interpretations. A pre-recorded presentation was shown at 11:00 AM and 5:00 PM followed by 49 oral comments. A virtual public outreach center, accessed through the Project website, included the project materials available at the in-person public hearing, described below, and was available through the end of the DDR/DEIS public review period.

The in-person public hearing was held at the Oncenter in compliance with relevant COVID-19 social distancing and venue capacity limits in place at the time of the hearing. This venue is transit-accessible and accessible to people with disabilities (i.e., compliant with ADA). An open house was conducted from 3:30 PM to 8:30 PM. The open house had 47 boards and plans, three monitors displaying traffic simulations, a monitor showing before and after views of the alternatives, and a monitor showing the animation of the Community Grid (identified as the Preferred Alternative). Staff were available throughout the open house to informally answer questions. The hearing was conducted in English with American Sign Language. Spanish interpretation and a language line were also available. A pre-recorded presentation was shown at 4:00 PM and 6:00 PM followed by oral comments. A total of 68 comments were received (44 oral and 24 written). The in-person hearing was also livestreamed through the NYSDOT's YouTube channel.

Recordings of the hearings were made available on the Project website following the hearings.

9.3.2 ADDITIONAL MEETINGS

In addition to the formal public scoping meetings, open houses, and public hearings, other meetings have been held to provide information and solicit input on the Project.

- **Project Update Presentations.** Project update presentations were given on May 1, 2014 at the Everson Museum and at the Capital for a Day event held at SKY Armory on September 30, 2015. These presentations included information and updates on the development of the alternatives and the environmental review process. Boards were on display, and Project team members were on hand to discuss the Project with members of the public. Venues for both meetings were convenient, centrally located, and transit-accessible. The meetings were accessible to persons with disabilities. Sign language services were provided. Spanish language interpreters were available.

During both events, a presentation was given and informational displays were set up for viewing by the public. Project team members were available to provide information about the Project and answer questions. Attendees were provided the opportunity to submit written comment forms. Approximately 365 people attended the Project update presentation in May 2014, and approximately 110 people attended the Capital for a Day event in September 2015. Presentations from both meetings were recorded and made available on the Project website.

- **Neighborhood and Community Meetings.** The neighborhood and community meetings are designed to give residents throughout the Syracuse region additional opportunities to learn about the Project and the ongoing environmental review process and provide written comments. The purpose of these meetings was to present information from the major public meetings in a smaller, more informal setting, with a particular emphasis on neighborhood concerns, and engage in one-on-one conversations with attendees on topics of their concern. Neighborhood meetings were held in the city, in neighborhoods with identified environmental justice populations where possible, and community meetings were held in surrounding areas.

The following strategies were used to encourage broad-based participation in the Project's neighborhood meetings:

I-81 VIADUCT PROJECT

- In accordance with CEQ's environmental justice guidelines, which advise the use of different meeting sizes and formats so that communications are tailored to the particular community or population, the neighborhood meetings were located in smaller facilities in neighborhoods with identified environmental justice populations.
- Meetings were held in locations where the communities typically gather. NYSDOT sought advice on meeting locations from elected officials, SHA representatives, and the City of Syracuse's "Tomorrow's Neighborhoods Today" (TNT) coordinators. Based on this input, neighborhood meetings were sometimes held at more than one venue in certain neighborhoods.
- Each venue was ADA accessible and located along a pedestrian and/or transit route.
- Meetings included display boards and materials specific to the particular neighborhood or community. For example, meetings in the Southside included before-and-after simulations of the alternatives from different vantage points in the neighborhood. Meetings in the Northside included simulations of the proposed ramps connecting I-81 and I-690 from Franklin and Butternut Streets.
- Project team members were on hand to discuss the Project with attendees.
- Spanish language interpreters were available.
- Sign language interpreters were available upon request.
- Attendees were offered comment sheets in both English and Spanish.

The first round of neighborhood and community meetings occurred in September and October 2013. Meetings were held in the Southside, Northside, Downtown, and Westside neighborhoods with a combined number of attendees of approximately 340. A community meeting held in the eastern suburbs (DeWitt) had 75 attendees.

The second round of neighborhood meetings took place in July 2014. This round included two separate meetings in the Northside: one was held at Dr. Edwin E. Weeks School in Hawley-Green, and the other occurred in St. Peter's Parish, which conducts outreach to Vietnamese populations. Similarly, meetings in the Southside took place in separate parts of the neighborhood, at Southwest Community Center and at Toomey Abbott Towers. The Southwest Community Center provides services to residents of an environmental justice community and functions as a central meeting place for the greater Southside. Toomey Abbott Towers, an ADA-accessible assisted living facility, was chosen as a venue site to bring Project information to a population with limited mobility. The meeting on the Westside was held at St. Lucy's Parish Center, which provides non-denominational services to residents of an environmental justice community and functions as a central meeting place for the Westside. This round of neighborhood meetings had a combined attendance of approximately 305 people.

NYSDOT also held a community meeting in the Town of Salina on December 3, 2015, attended by approximately 45 people.

In October and November 2016, a third round of neighborhood meetings was held in the Southside, Northside, Downtown, Eastside, and Westside neighborhoods and attended by

approximately 245 individuals. Community meetings were held in Skaneateles, DeWitt, and Cicero and were attended by approximately 400 individuals.

In June and July 2019, neighborhood meetings were held in the Southside, Northside, Downtown, Eastside, and Westside neighborhoods. These meetings were attended by approximately 285 individuals. During the same period, community meetings were held in Camillus (western suburbs), East Syracuse (eastern suburbs), Lafayette (southern suburbs), and Cicero (northern suburbs) and were attended by approximately 645 individuals. A community meeting in the Town of Salina was held in September 2019 and attended by approximately 195 people.

Following the public hearing for the DDR/DEIS in August 2021, neighborhood meetings were held in August and September 2021 in the Southside, Northside, Eastside, and Westside neighborhoods. These meetings were attended by approximately 215 people. During the same months, community meetings were held in LaFayette, Liverpool, Fayetteville, Cicero, and Camillus. These meetings were attended by approximately 360 people.

- **Environmental Justice Stakeholder Outreach:** In May 2021, NYSDOT held a meeting with the Syracuse Housing Authority and a meeting with the New York Civil Liberties Union and Urban Jobs Task Force to specifically discuss considerations for environmental justice communities. During both meetings, the attendees discussed the current project design, noting changes since publication of the preliminary DDR/DEIS in April 2019 (see **Executive Summary**); the current construction schedule; proposed improvements to Wilson Park (see **Section 6-4-2, Parklands and Recreational Resources**); the process for disposition of surplus transportation right-of-way, including the formation of the land use working group of stakeholders (see **Section 6-2-1, Neighborhood Character**); and contracting and employment opportunities for minority-owned businesses and local populations. The meeting with the Syracuse Housing Authority also included discussion of concerns related to construction impacts to residents near the work zone (see “Construction Effects” under **Section 6-2-3.3.3** for discussion of construction effects and mitigation measures); building acquisitions, such as the acquisition of the Syracuse Housing Authority maintenance garage (see **Section 6-3-1, Land Acquisition, Displacement, and Relocation** for discussion of property acquisition); traffic on the future BL 81 (see **Chapter 5, Transportation and Engineering Considerations** for discussion of traffic on Project roadways); concerns related to potential upward pressure on rents (see **Section 6-3-2, Local and Regional Economies** for discussion of economic effects); and the Syracuse Housing Authority’s ongoing master planning effort and potential future plans for Wilson Park. The meeting with the New York Civil Liberties Union and Urban Jobs Task Force also included discussion of engaging the local community and minority contractors in construction of the Project; proximity of the proposed roundabout to the Dr. King Elementary School and related traffic and air quality concerns (see **Chapter 5, Transportation and Engineering Considerations** and **Section 6-4-4, Air Quality** for discussion of traffic on Project roadways and associated effects to air quality); concerns related to potential construction impacts to residents near the work zone (see “Construction Effects” under **Section 6-2-3.3.3** for discussion of construction effects and mitigation measures); enforcement of air quality mitigation measures during construction; potential impacts to Wilson Park during construction (see **Section**

6-4-2, Parklands and Recreational Resources for discussion of effects to parkland); disposition of surplus transportation right-of-way (see **Section 6-2-1, Neighborhood Character** for discussion of effects to neighborhoods and land uses); upcoming public involvement opportunities; and noise barrier outreach and aesthetics of proposed noise barriers (see **Section 6-4-6, Noise** for discussion of the assessment of noise barriers and associated outreach).

NYSDOT is addressing the input received during these and other meetings by continuing to develop its program for local hiring and commitments for contracting minority-owned businesses. NYSDOT would also develop an outdoor ambient air quality monitoring program during final design, which would include the protocols for overseeing the program. During final design, NYSDOT would continue to coordinate with the Syracuse Housing Authority regarding property acquisition and its master plan. In addition, subsequent to the publication of the DDR/DEIS, NYSDOT is no longer proposing a roundabout at BL 81 and MLK Jr., East; refer to **Section 3.4.3** for more information about the proposed roundabout at Van Buren Street. **Construction Practices Meetings.** NYSDOT held a series of nine small group meetings in October 2017 with over 40 different organizations and representatives, including those representing environmental justice communities, to discuss standard protocols and procedures to avoid, minimize, or otherwise mitigate adverse construction effects, including impacts to traffic, the human environment, and the natural environment. NYSDOT solicited input on potential construction impacts and other issues related to the Project.

- **Local Hiring Advisory Meetings.** NYSDOT met with individuals and representatives of organizations that focus on job advocacy, training, and placement, including those representing environmental justice communities. Organizations included Urban Jobs Task Force, Center for Community Alternatives, Vision for Change, Greater Syracuse HOPE, Jubilee Homes of Syracuse, Home Headquarters, Providence Services, Alliance for Economic Inclusion, Catholic Charities, Jobs Plus, SUNY Educational Opportunity Center (EOC), Southwest Community Center, Empire State Association of Minority Contractors, Syracuse Housing Authority, and Upstate Minority Economic Alliance. Meetings were held at the Project Outreach Center. The first meeting, held on September 20, 2016, was attended by representatives of 10 organizations. They discussed ideas on how best to create local jobs on the Project for those living in high poverty areas and ways that NYSDOT could collaborate with these organizations to distribute information about the Project and provide training and job placement. The second meeting was held on December 1, 2016 and included representatives of more than 40 different organizations, who participated in a roundtable discussion. Topics included the categories of work needed on the Project, the skill sets and training requirements needed, and the barriers to employment particularly for minority and low-income populations. NYSDOT and FHWA also participated in the City of Syracuse's I-81 Jobs Big Table Forums held on August 13, 2020, December 14, 2020, April 19, 2021, July 22, 2021, and October 25, 2021 to continue collaboration on Central New York job initiatives. NYSDOT representatives participate in the work groups established by the city to meet the job initiative goals (Community Workforce Agreement/Project Labor Agreement, Disadvantaged Business Enterprise, Workforce Development, and Funding Work Groups).

Jobs-related information has been available at meetings and events held throughout the Project Area, including those in census tracts with environmental justice populations, as listed in **Appendix M-1**.

- **Noise Barrier Meetings.** As documented in **Section 6-4-6, Noise** of this FDR/FEIS, NYSDOT conducted traffic noise analyses to identify the Project's potential noise effects to properties fronting I-81, I-481, I-690, and other roadways in the Project limits. The studies also involved evaluating where to locate noise barriers to lessen these impacts. The viewpoints of the "benefited receivers"—those who would be benefited by a proposed noise barrier—are a major consideration in reaching a decision on the reasonableness of the noise barriers. To solicit these viewpoints, NYSDOT sent letters to the benefited property owners and residents, including a ballot to vote on whether or not they favored constructing the proposed noise barrier; an informational brochure with maps and photos showing the locations of the proposed barriers; and a pre-addressed/postage paid envelope for the ballot return (an option to vote online was also available). In addition, four noise barriers public meetings were held in areas near the proposed noise barriers: Dr. King Elementary School on July 24, 2019; Cicero North Syracuse High School on July 30, 2019; Henninger High School on August 14, 2019; and DeWitt Community Room on August 15, 2019. The meetings took place from 4:00 to 7:00 p.m. and included a PowerPoint presentation and approximately 30 informational boards. Project team members were on hand to respond to questions and to provide information to assist owners and residents in making a decision. Attendance at these meetings was not required for benefited property owners and residents to provide their viewpoint. Additional opportunities to comment on the noise barriers were provided at the in-person and virtual public hearings for the DDR/DEIS and at the subsequent neighborhood and community meetings. For more information about the noise barrier outreach, refer to **Section 6-4-6, Noise**.
- **Small or Individual Meetings.** FHWA and NYSDOT have held and will continue to hold smaller group or individual meetings on the Project's status and progress and to receive input and comments. Efforts have been and will continue to be made to hold individual and group meetings with elected officials; representatives of county and municipal governments and regional agencies; the residential, business, and commuter communities; special interest groups; and individuals, as appropriate. To date, small or individual meetings have included:
 - Briefings of elected officials, in groups as well as individually;
 - Meetings with staff representing Onondaga County, the City of Syracuse, Town of Salina, Town of DeWitt, and Syracuse Metropolitan Transportation Council;
 - Meetings with representatives of Centro and the New York, Susquehanna & Western Railway;
 - Meetings with advocacy groups and other interested parties (e.g., Downtown Committee, CenterState CEO, Near Westside Initiative, ReThink 81, Moving People Transportation Coalition, Central New York Community Foundation, American Institute of Architects, and others);

I-81 VIADUCT PROJECT

- Meetings with the universities and hospitals (Syracuse University, State University of New York [SUNY] College of Environmental Science and Forestry at Syracuse University, SUNY Upstate Medical University, Crouse Hospital, Syracuse VA Medical Center, and St. Joseph's Hospital);
 - Meetings with employers, such as representatives of Destiny USA, the Woodbine Group, the Pemco Group, and JWP Management;
 - Meetings with housing organizations and interest groups such as the Syracuse Housing Authority, Fair Housing Council, Greater Tenants Network, and CNY Chapter of the New York Civil Liberties Union;
 - Meetings with local job advocates including the Urban Jobs Task Force, Center for Community Alternatives, Providence Services, CenterState CEO Worktrain, Central New York Building Trades Council, and Greater Syracuse HOPE Initiative;
 - Meetings with neighborhood representatives such as the Interdenominational Ministerial Alliance, Northside Urban Partnership (Northside UP), and Jubilee Homes of Syracuse; and
 - Meetings with groups representing environmental justice communities, for example, Interdenominational Ministerial Alliance of Syracuse, Northside UP, CNY Chapter of the New York Civil Liberties Union, Fair Housing Council, CNY Solidarity Coalition, Upstate Minority Economic Alliance, and Dr. King Elementary School Parent Teacher Organization (PTO).
- **Community Forums.** NYSDOT has also been invited to participate in a number of community forums sponsored by others. At each of these meetings, open to the public, NYSDOT provided attendees with a Project overview and updates and provided an opportunity for attendees to submit written comments. Those forums include the following:
 - City of Syracuse's TNT city-wide meeting in August 2014;
 - "Forging Our Community's United Strength," FOCUS Greater Syracuse Forum in May 2016;
 - Syracuse Common Council Transportation Committee Meeting in November 2016;
 - Southside TNT Panel Discussion in April 2017;
 - Worksmart M/W/DBE Program in June 2017;
 - Dr. King Elementary School PTO in September 2017;
 - Syracuse Housing Authority-sponsored meeting on the Project at the Coffee House in September 2019; and
 - St. Joseph's Hospital employees' meeting on the Project in October 2019.

In addition to the meetings described above, non-traditional outreach efforts have included the following:

- **Outreach at Local Festivals and Community Events.** Staff has disseminated Project-related information at festivals throughout the City of Syracuse, including:

- Central New York Festival Latino-Americano in August 2015, 2016, 2017, 2018, and 2019, where Spanish-speaking Project staff and an interpreter were present;
 - Westcott Street Cultural Fair in September 2015, 2016, 2017, 2018, 2019, and 2021;
 - Juneteenth Festival in June 2017, 2018, and 2019;
 - Northside Festival in September 2017 and 2018;
 - La Feria in the New York State Fair in August 2017, 2018, 2019, and 2021, where Spanish-speaking Project staff and an interpreter were present; and
 - Arts and Crafts Festival, in July 2014, 2015, 2016, 2017, 2018, 2019, and 2021.
- **Outreach to Refugee and Immigrant Communities and LEP Individuals.** To more effectively involve environmental justice populations, those with limited English proficiency, and other traditionally underrepresented populations, such as refugee groups, other “non-traditional” methods were used to bring Project information to locations where members of these communities were gathering, as listed below. Project representatives were on hand to provide opportunities for engagement at the following:
 - Citizenship Class hosted by Catholic Charities in the Northside neighborhood in August 2014, December 2016, and October 2017;
 - ESL class hosted by the Syracuse Central School District in the Westside neighborhood in August 2014;
 - Refugee Assistance Program ESL class hosted by the Syracuse Central School District in the Northside neighborhood in October 2017; and
 - World Refugee Day hosted by the New Americans Forum in Schiller Park in June 2018 and 2019.

9.3.3 STAKEHOLDERS’ GROUPS

Several groups have been formed to provide additional forums for active public participation. These committees, chaired by NYSDOT, have been and will be briefed prior to major milestones and as needed throughout the EIS process. At this time, the following groups have been established:

- **Stakeholders’ Committee.** The Stakeholders’ Committee was formed to disseminate Project information and obtain input from a variety of stakeholders. This committee includes members of the general public (who are able to sign up for the committee on the Project website, at public meetings, and at the Project Outreach Center), elected officials, and stakeholders who represent agencies, interest groups, and organizations. The first Stakeholders’ Committee meeting took place on June 24, 2014 at the Everson Museum. Members were invited to the Capital for a Day presentation on the Project, which took place on September 30, 2015. The Committee also met on June 9, 2016 at HW Smith Elementary School.
- **Stakeholders’ Advisory Working Groups (SAWGs).** Each of the Project’s two SAWGs serves as a forum for the exchange of information, discussion of issues, and solicitation of feedback that will be taken into consideration during the development of the EIS. Membership is small enough

to encourage workshop-style sessions and to explore specific issues in detail. Some members were recommended by the City and County. The groups held their first meetings in April 2014, and 24 meetings have occurred as the EIS has progressed. SAWG meetings are held at the Project Outreach Center.

- **Sustainability Stakeholders’ Advisory Working Group.** To ensure that local perspectives are captured and the Project is aligned with the VisionCNY Regional Sustainability Plan and sustainability plans developed by Onondaga County and the City of Syracuse, a Sustainability Stakeholders’ Advisory Working Group was established. This group includes representatives of organizations that represent or advocate for sustainability, the environment, transportation choices for mobility and accessibility, social issues, and public health and human services.
- **Community and Economic Development Stakeholders’ Advisory Working Group.** This group was formed as an opportunity to partner with local business councils and other organizations to formulate ways to maximize return on investments while supporting the goals identified by CNY Regional Economic Development Council (REDC). This working group includes key business, real estate, planning, and economic development organizations that represent the public and non-profit, institutional, and private sectors active in the Project Area and throughout the Syracuse region.
- **Urban Design Technical Advisory Panel.** As part of the effort to produce high quality urban design for the I-81 Viaduct Project, NYSDOT has established an Urban Design Technical Advisory Panel (UDTAP). The panel comprises a group of design and design-related professionals with specialized knowledge and experience in urban design. Five of the members are architects and/or landscape architects and two represent the City of Syracuse. The panel’s purpose and mission is to provide NYSDOT with guidance and ideas to improve, enhance, and augment the Project designs as they are being developed. Members are asked to serve in an advisory capacity to NYSDOT and provide input and ideas on the landscape, urban design elements, and aesthetics of the I-81 Viaduct Project. To date, meetings have focused on the proposed West Street and Onondaga Creek improvements (July 6, 2016); Almond Street and the potential southern gateway (August 9, 2016); proposed bicycle/pedestrian improvements and other improvements to local streets (November 17, 2016); potential improvements north of I-690 including urban design and gateway treatments (April 18, 2017; April 27, 2017; May 8, 2017; May 24, 2017; and July 18, 2017); potential pedestrian, bicycle, and streetscape enhancements along the Bear Street corridor and connection to the Creekwalk (June 7, 2019); gateway possibilities and urban design improvements in the southern Project Area including at MLK, Jr. East and Van Buren Street (October 29, 2019, December 4, 2019, and March 11, 2020); potential roundabout locations (October 27, 2021); and noise barrier aesthetics (March 9, 2022).
- **Northside UP I-81 Work Group.** NYSDOT held a series of meetings, on March 7, 2017; March 29, 2017; April 13, 2017; and June 8, 2017, with representatives of the Northside UP I-81 Work Group to discuss potential improvements in the area between I-690 and Hiawatha Boulevard under each build alternative. Topics discussed included concerns regarding the creation of a fully directional I-81/I-690 interchange; potential concepts for the Butternut Street bridge and its relocation; the extension of and improvements to Clinton Street; treatments for Bear, Butternut,

and Clinton Streets as well as Genant Drive; the potential to channel traffic to the local street grid north of I-690 rather than the highway under the Community Grid Alternative; potential alternative modifications such as roundabouts and signalized intersections; and gateway and other aesthetic concepts.

9.3.4 OTHER PUBLIC OUTREACH TOOLS AND EFFORTS

NYSDOT used additional outreach tools to communicate with communities throughout the EIS process.

- **Project Website.** A Project website (www.dot.ny.gov/i81opportunities) is available. Visitors can sign up for the Project mailing list and Stakeholders' Committee and submit comments and questions to the lead agencies via a "Contact Us" feature. The site has been and will continue to be updated regularly to include announcements of Project meetings and access to Project documents (e.g., meeting materials, scoping documents, Coordination Plan, DDR/DEIS, this FDR/FEIS, and ROD), which are posted as they become available. Links to NYSDOT's Twitter account and RSS feed are available from the site, and language assistance is available in Spanish, Chinese, Haitian Creole, Bengali, Italian, Polish, Arabic, Korean, Russian, and Yiddish.
- **Mailing List.** The Project mailing list, which comprises more than 6,400 contacts, was initially drawn from the contact list developed for the I-81 Challenge planning study and has been updated continually. The list includes elected officials, public agencies, stakeholder and community groups, media, and individuals. Included within the list are organizations, media, and individuals that have relevance and connections with LEP and environmental justice communities in the Project Area. The mailing list is used to distribute meeting announcements and information about the Project.
- **Project Hot Line.** A toll-free telephone number, 1-855-I81-TALK (855-481-8255) or 315-703-4181, has been set up for members of the public to reach Project representatives during business hours; messages left after hours are returned promptly.
- **Project Outreach Center.** This center, located in the Carnegie building at 335 Montgomery Street in Syracuse, was centrally located in a census tract with environmental justice populations and was transit accessible. The center was opened in 2013 in conjunction with Onondaga County and the City of Syracuse to provide an additional resource for members of the public to access information, ask questions, and learn about the I-81 Viaduct Project. It was open three days a week until October 2014. From October 2014 to November 2019, it was open Tuesday and Thursday from 11:00 AM to 2:00 PM. Two members of the Project team were available during that time to interact with visitors. Boards from recent Project meetings were on display; comment sheets and Project documents, such as the *Scoping Report* and the preliminary DDR/DEIS (April 2019), and hand-outs provided at public meetings were available; and visitors were guided through the displays by Project staff. An outreach center with a community liaison will be available throughout the final design and construction phases of the Project (refer to **Chapter 4, Construction Means and Methods**, for more information about the outreach plan during these phases).

- **Informational Materials.** Informational materials are produced at key points during the Project development process. Content has included written information on the Project (e.g., *Scoping Initiation Packet*, *Draft Scoping Report*, *Scoping Report*, Project newsletters, and the preliminary DDR/DEIS), as well as display boards and contact information. Presentations, meeting handouts, animations, videos, and other materials have been developed as appropriate to keep the public informed about Project developments. Comment sheets are made available in both English and Spanish to encourage public input at public meetings, information tables at festivals and community events, community forums, ESL and citizenship classes, and at the Project Outreach Center.
- **Media Contacts.** Press briefings and one-on-one contact with the press and media outlets have taken place as needed. Press releases are issued to communicate new Project developments. Outreach to the media has included press releases and paid print and web advertisements in local media and newspapers serving low-income, minority, and LEP communities. These outlets include the Post-Standard/Syracuse.com, CNY Latino/CNY Latino.com, Eagle News, Syracuse New Times, CNY Business Journal, and The Stand.
- **Project Repositories.** Project documents are made available at several repositories including those in environmental justice areas. Local repositories enable members of the public to review Project documents, including EIS documents, and other informational materials. The Project repositories are listed in **Appendix M-2**.

9.4 PUBLIC COMMENTS

FHWA and NYSDOT received public comments on the Project during the formal scoping comment period, which ended on September 2, 2014. Comments were accepted by letter, written comment form, electronic comment form, and e-mail, as well as orally at two public scoping meetings. Substantive comments were reviewed and considered, and similar comments were grouped, summarized, and responded to in the *Scoping Report* (April 2015). Additional comments received between the release of the *Scoping Report* (April 2015) and March 2021, including comments on the preliminary DDR/DEIS (April 2019), also were reviewed and considered; the comments themselves are found in **Appendix M-6** of the DDR/DEIS (July 2021), and the summaries and responses can be found in **Appendix M-5**. In addition, some of the major comment themes are summarized in **Chapter 9** of the DDR/DEIS, and some of the environmental justice comment themes are summarized in **Section 6-2-3** of the DDR/DEIS.

FHWA and NYSDOT received and considered more than 8,000 comment submissions during the public review period of the DDR/DEIS, which began with its publication on July 16, 2021 and ended on October 14, 2021; however, comments received shortly after the closure of the comment period (through October 19, 2021) were also accepted. Substantive comments are summarized and responded to in **Appendix M-5** of this FDR/FEIS, and the individual submissions are contained in **Appendix M-6**. (For a description of some of the more prevalent comment themes related to environmental justice refer to **Section 6-2-3**.)

As documented throughout the DDR/DEIS and this FDR/FEIS, public input has been considered in the design of the Project alternatives, in the evaluation of environmental impacts, and in the development of the mitigation commitments. Examples include but are not limited to:

- As noted in **Chapter 3, Alternatives**, NYSDOT studied several alternatives as a result of public input, including numerous tunnel concepts. Additional potential alternative ideas suggested by the public, including many design ideas and a “Skyway” concept, are summarized and responded to in **Appendix M-5** of this FDR/FEIS.
- As a result of the suggestion that the Community Grid alignment pass beneath, rather than over, the New York, Susquehanna and Western Railway in the vicinity of Renwick Avenue, NYSDOT modified the alignment. NYSDOT developed a new concept that shifted the alignment eastward and passed beneath the railway. In addition, the embankment between Taylor and Monroe Streets, a feature of the over-the-railway concept created by the descent of the highway from a higher grade over the railroad to a lower grade at the street surface, would no longer exist (see **Chapter 3, Alternatives**, for additional details about this design modification).
- Some commenters expressed concern about traffic along MLK, Jr., in particular in proximity to the Dr. King Elementary School, and suggested alleviating that traffic by diverting it at Colvin Street. Other commenters requested greater access from I-81 to Colvin Street. In response to these comments, NYSDOT modified the Community Grid Alternative to include a northbound exit from I-81 to Colvin Street.
- In response to comments related to construction concerns, NYSDOT held a series of meetings to provide information on its standard construction protocols and procedures as well as potential mitigation measures specifically developed for the Project. As a result of the input received during these meetings, NYSDOT developed commitments to help minimize or mitigate the adverse effects of construction activities, as listed in **Table 4-7** in **Chapter 4, Construction Means and Methods**.
- In response to concerns noted above under “Building Impacts,” NYSDOT held informational meetings about the property acquisition process and relocation assistance program in June 2016 and has continued meetings with individual property owners.
- To address transit-related comments, FHWA and NYSDOT modified the Project objectives to add “Maintain access to existing local bus service and enhance transit amenities³ within the project limits in and near Downtown Syracuse.” NYSDOT will continue to coordinate with Centro during the final design phase to explore the incorporation of transit amenities.
- NYSDOT held numerous meetings with the Northside UP I-81 Working Group and the UDTAP to discuss potential improvements in the Northside, including the alignment of the Butternut Street bridge, the reconstruction and extension of Clinton Street, the Lodi Street

³ Transit amenities that may be explored could include bus stops and shelters, bus turnouts, and layover and turnaround places.

overlook, the alignment of the Court Street bridge, and other alternative modifications as described in **Chapter 3, Alternatives**.

- Following the 2019 public meetings that occurred after the publication of the preliminary DDR/DEIS and in consideration of comments about the southern I-81/I-481 interchange, NYSDOT revised the design of the Community Grid Alternative to provide a direct connection between southbound BL 81 and northbound I-81 that had not been available in the previously proposed design.
- To address public concerns, NYSDOT included numerous improvements at I-481 Interchange 3 (as described in **Chapter 3, Alternatives**).
- Commenters expressed concern about potential construction impacts to the traffic, air quality, and noise impacts on the Dr. King Elementary School; the proximity of the school to BL 81; and the proposed roundabout at BL 81 and MLK, Jr. East as described in the DDR/DEIS. In response, FHWA and NYSDOT are no longer proposing a roundabout at BL 81 and MLK, Jr. East (see **Chapter 3, Alternatives**, for more information, including information about traffic-calming measures between Colvin Street and MLK, Jr. East to encourage motorists to decrease speed). The Community Grid Alternative has been redesigned without a connection between BL 81 and MLK, Jr. East. As stated in **Chapter 4 (Table 4-7), Section 6-2-3, and Section 6-4-4** of this FDR/FEIS, a noise monitoring, as well as an outdoor ambient air quality monitoring program, would be implemented during construction of the Project and would be overseen by NYSDOT. The air quality program would consist of real-time particulate monitoring at a number of locations within the local community, including locations within the environmental justice area. Locations and durations would be determined in consideration of land uses, non-Project sources of emissions, and construction phasing. One monitor would be located outdoors in the vicinity of Dr. King Elementary School while construction would be occurring near the school. Locations for other program monitors would be determined during final design.
- In response to comments received during the development of the EIS regarding potential public exposure to lead-based paint (LBP) during construction activities, NYSDOT would implement a LBP public education program prior to the demolition of the existing I-81 viaduct and adjacent structures. NYSDOT would develop the program during final design, in coordination with the Onondaga County Health Department. Potential activities could include the development of easy-to-read educational materials on household protocols to prevent the spread of contaminated dust into homes and holding a community session/meeting focused on demolition and ways to protect residents from lead dust during construction. As described in **Section 4.5.2**, public outreach during construction would include the establishment of a telephone number for the public to use to ask questions/provide input during construction; implementation of a communication schedule and procedures for providing construction status updates and other construction-related information to the public; and development and maintenance of a website to advise the public on construction activities.
- In response to concerns about the lack of a pedestrian crossing at Almond Street and Monroe and Madison Streets, NYSDOT will consider pedestrian-activated signals at these locations during final design.

I-81 VIADUCT PROJECT

- In response to comments regarding the overall layout of Almond Street, NYSDOT will collaborate with the City and appropriate stakeholders during the final design phases to refine the design of the areas of Almond Street outside the curb lines, including widths of the medians and pedestrian refuge areas, cycle track, shared use lanes, and sidewalks, etc. The refinements to Almond Street would be designed to be consistent with the City's vision and the needs and objectives of the Project.
- Acknowledging the importance of an urban design vision for the Project, NYSDOT will work with the City and pertinent stakeholders to develop a vision consistent with the Project's needs and objectives during the final design phases of the Project. Commenters also highlighted the importance of gateway/aesthetic enhancements, which are described in **Chapter 5, Transportation and Engineering Considerations**. The integration of urban design details and gateways will be further explored during final design, and NYSDOT will continue to meet regularly with its Urban Design Technical Advisory Panel regarding the development of these design features.
- In response to comments on jobs and the need for training, NYSDOT held several meetings with community leaders, union representatives, and work force advocates and training organizations to devise methods to promote the use of a local work force and develop job training programs. The meetings were located in environmental justice communities. As a result of input received at these meetings, training programs are under way and others are being developed to provide both classroom and hands-on training for highway construction related positions. Job-related information has been available at the Project Outreach Center and at numerous public meetings and non-traditional outreach efforts. NYSDOT also attends job fairs providing information specific to categories of work anticipated for the Project.

In August 2021, NYSDOT began coordinating with local stakeholders, including the City of Syracuse, Urban Jobs Task Force, and Legal Services of CNY to establish a local hiring preference on the I-81 Viaduct Project. Topics of discussion at the local stakeholder meetings included available workforce, similar requirements on City of Syracuse projects, incentives to contractors, and a framework for providing employment opportunities to residents most affected by the current viaduct and the I-81 Viaduct Project. Meeting participants identified the need for an incentive-based hiring program that would encourage contractors on the Project to hire residents in some of the City of Syracuse's most disadvantaged neighborhoods. NYSDOT submitted an application for local hiring preference to FHWA for review in December 2021, which was approved. The program would create a local hiring preference for the I-81 Viaduct Project, include an expansion of NYSDOT's On-the-Job Training program for the Project to increase access for individuals to seek careers in heavy highway construction. This would help give greater opportunity for individuals living near the Project and in the City of Syracuse to work directly on the Project.

NYSDOT has partnered with New York State Department of Labor (NYSDOL) to create Workforce Forward: Syracuse. This program and \$1 million in State funding would seek to connect workers to training opportunities and to short-term and long-term infrastructure jobs in and around Syracuse. Workforce Forward would help place and train individuals seeking to work on the many ancillary jobs that would be created by the Project. The plan is to have NYSDOL

in the local community connecting with people in the neighborhoods they live in and help them find the employment or training they would need to be successful.

NYSDOT also has established the WorkSmart NY program in partnership with SUNY EOC, which is helping give those who want to work in infrastructure construction the basic skills to work on any job site. Through the WorkSmart NY program, NYSDOT will coordinate with existing community action agencies and initiatives such as CenterState CEO; Syracuse Build, led by the City of Syracuse; educational institutions such as SUNY EOC; trade and industry representatives; and other key partners to create the WorkSmartNY Syracuse Build Collaborative (the Collaborative) for the FHWA Highway Construction Worker Partnership (HCWP) grant. The region's workforce development board, CNY Works, Inc., has participated in the planning and organization of this grant and a statement of commitment has been requested.

FHWA's HCWP grant provides funding to states to expand workforce development opportunities in local communities and increase the number of construction workers in the highway construction field through recruitment, assistance, training, and placement. The Collaborative believes that a successful program requires more than teaching an individual trade skills; it must provide supportive programs and services throughout the trainee/apprenticeship duration. The Collaborative has a long and successful track record of working with other agencies in underserved communities to secure funding for construction skills training, recruitment, and placement, and spearheading workforce development advocacy efforts. NYSDOT will leverage those skills, expertise, and resources to bring the partnership full circle by engaging local labor unions and industry representatives to provide actual employment opportunities to trained individuals.

NYSDOT has applied for additional federal grant funds through FHWA to expand the WorkSmart NY program to increase capacity and get more individuals into the heavy highway construction field. If successful in securing the funds, the program would grow its capacity to roughly 50 participants a year and be able to increase the number of cohorts for Pathways to Apprenticeship, a program to help get more people involved in local trades unions.

NYSDOT has recently secured Statewide Transportation Information and Coordination Center (STICC) funds to create a new, interactive video program to introduce and encourage high school students to pursue careers in heavy highway construction. The plan is to work directly with the Syracuse City School District and its P-Tech program to show students the opportunities they have in the building infrastructure field through first-person videos by students and individuals working on projects and to use the Project as a catalyst to create video content that students can explore to learn more about fields of interest. NYSDOT plans to monitor the local hiring metrics throughout the Project and would conduct regular meetings with the WorkSmart NY Syracuse Build Collaborative to gauge the progress on hiring and where things need to be adjusted.

- To address community concerns about the disposition of potential surplus transportation right-of-way, NYSDOT would form a land use working group consisting of representatives from the City, the City's school district, economic development and economic opportunity organizations, the business community, environmental justice communities, neighborhood residents, and other organizations and stakeholders as appropriate to provide input to NYSDOT in establishing a framework for the non-transportation use of each potential surplus parcel. Any new use or

development would be subject to the City of Syracuse's zoning ordinance and its Land Use and Development Plan 2040 currently being updated by the ReZone Syracuse project. Through the ReZone Syracuse process, the City of Syracuse has and continues to solicit community input.

- In response to comments regarding the economic effects of the Community Grid Alternative, NYSDOT prepared more detailed analysis of potential indirect business displacement on industries that would be sensitive to changes in pass-by traffic. For example, following the publication of the DDR/DEIS in July 2021, NYSDOT considered additional data provided by hotel owners. NYSDOT met with 12 hotel representatives at their request on September 13, 2021. Following the meeting, NYSDOT considered information from the hotel representatives including employment estimates, hotel amenities, guest composition and origins, advance bookings vs. walk-in reservations, length of stay, and brand loyalty membership. This data was incorporated into the analysis of potential economic effects in the FDR/FEIS. Refer to **Chapter 6-3-2, Local and Regional Economies** and **Appendix D-2** for more information.
- To address concerns regarding the aesthetic appearance of noise barriers, NYSDOT will employ a team of landscape architects to develop aesthetic design of the noise barriers during final design in coordination with Project stakeholders and the Urban Design Technical Advisory Panel, which includes landscape architects, architects, and a City representative.
- To address comments concerning creation of a gateway at the southern end of BL 81 and the need for reducing traffic speeds between Colvin Street and the proposed roundabout at Van Buren Street, NYSDOT will explore the introduction of urban landscaping treatments and other visual cues during final design to further convey to motorists that they are transitioning from a freeway to a city street and vice versa. NYSDOT will coordinate with the City of Syracuse and appropriate stakeholders regarding streetscape enhancements in the Central and I-481 South Study Areas.

NYSDOT will continue to consider and address concerns as the Project progresses. For information about public outreach during construction, refer to **Chapter 4, Construction Means and Methods**.