



Final Tier 1 Environmental Impact Statement and Preliminary Section 4(f) Evaluation

Appendix H4, Public Advocacy Organization Comments on Draft Tier 1 EIS and Responses

July 2021



Federal Aid No. 999-M(161)S
ADOT Project No. 999 SW 0 M5180 01P



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Comment submissions from public advocacy organizations are presented in this appendix. Some comments were submitted multiple times by the same organization. One submission is included in this appendix, and duplicate submissions are included in Appendix H5 (Public Comments on Draft Tier 1 EIS and Responses).

Standard responses were prepared to provide broad responses to the most frequently raised issues and to supplement unique comment responses. Standard response codes referenced in comment responses correspond to the codes underlined in bold within Appendix H1 (Standard Responses).



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ID	Comment Document
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**Altar Valley
Conservation Alliance**



PO Box 27906
Tucson, Arizona 85726
alliance@altarvalleyconservation.org

July 8, 2019

Interstate 11 Tier 1 EIS Study Team
c/o ADOT Communications
1655 W. Jackson St., MD 126F
Phoenix, AZ 85007

RE: Comments on the Interstate 11 Tier 1 Draft Environmental Impact Statement, Nogales to Wickenburg

To Whom It May Concern:

We appreciate the opportunity to provide comments on the Interstate 11 Tier 1 Draft Environmental Impact Statement (DEIS), Nogales to Wickenburg. The Altar Valley Conservation Alliance opposes the Recommended Alternative Route described in the Tier 1 DEIS for Interstate 11 that proposes cutting through the rural Altar and Avra Valleys. We support colocation of I-11 in the Tucson area with the already existing infrastructure of I-10 (Orange Route Alternative).

The Altar Valley Conservation Alliance is a 501(c)3 collaborative conservation organization of ranchers and other agriculturalists living and working in the Altar Valley. The Alliance began in 1995, when Altar Valley neighbors rallied together with the same vision: *conserving the Altar Valley for future generations*. The desire to leave the next generation with an open, healthy working landscape provided the rich soil from which the Alliance sprouted.

O-43-1 The Altar Valley is a 600,000-acre watershed, comprised of working ranches and the Buenos Aires National Wildlife Refuge. It is a key piece of the voter-approved Pima County Sonoran Desert Protection Plan, with over 20,000 acres of land included in the Conservation Lands System. The valley is also home to Kitt Peak National Observatory, which relies on the dark skies produced by the undeveloped landscape of the Altar Valley. Countless wildlife and biological species also call the valley's unfragmented landscape home.

O-43-2 A key tenet of the Alliance's mission statement is to "conserve healthy and productive working landscapes, including soil and water conservation, wildfire management, habitat conservation and protection of native species, and other environmental initiatives." The proposed location of the Recommended Alternative Route described in the Tier 1 DEIS for Interstate 11 through the

ID	Topic	Response
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O-43-1	Orange Alternative	Thank you for your input and interest in the I-11 Corridor Tier 1 EIS. FHWA and ADOT value the feedback on the Draft Tier 1 EIS provided by your organization. GlobalTopic_4, BR-9, V-1 and GlobalTopic_1
O-43-2	Visual	GlobalTopic_1, BR-1, N-1, AQ-1, V-1, and LU-3

ID	Comment Document
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ID	Topic	Response
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**Altar Valley
Conservation Alliance**



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O-43-2

undeveloped landscape of the Altar and Avra Valleys encourages the destruction of all of these things. The proposed Recommended Alternative would encourage urban sprawl and harm the rural character of the valleys. It would cause noise, air, and light pollution that would have negative regional impacts on a wide variety of lands, including, but not limited to: private land, Kitt Peak National Observatory, Arizona State Trust lands, land in Pima County's Conservation Lands System, tribal lands, Saguaro National Park, and other public lands.

The Altar and Avra Valleys are no place for an interstate when the I-10 corridor already exists and development can be wisely planned to colocate within an already established transportation corridor.

Thank you for the opportunity to provide comments on the Interstate 11 Tier 1 Draft Environmental Impact Statement (DEIS), Nogales to Wickenburg.

Sincerely,

Mary T. Miller
Executive Director
Altar Valley Conservation Alliance

ID	Comment Document
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Arizona Automobile Hobbyist Council

O-40-1

no comments on the route so far. I would like to bring up the question about ADOT making this a toll road. I have seen the "HOT" instead of the more common and no charge HOV lanes. My group is not in favor of a possibility of tolls on R-93 to the Northern end of the road. If some private company wants to build a new road, let them do so but we believe that any time or any place where a toll road connects to a taxpayer funded road, Route 93, there should be NO tolls on the roads that the taxpayer has paid for previously.

ID	Topic	Response
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O-40-1	Transportation	<p>GlobalTopic_8</p> <p>FHWA is following a tiered environmental process, and a Tier 1 EIS was completed during this phase of study. The Tier 1 EIS process is an effective method for managing the NEPA process across a large geographic area such as the I-11 Project Area. It allows the NEPA process to move forward prior to the identification of funding and lays the groundwork for where the corridor would be located. While no tolling proposal has been identified at this time, as there is no funding currently identified for the design and construction of I-11, tolling could be an option evaluated in future Tier 2 studies.</p>
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ID	Comment Document
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June 17, 2019

I-11 Tier 1 EIS Study Team
 c/o ADOT Communications
 1655 W. Jackson Street Mail Drop 126F
 Phoenix, AZ 85007

RE: I-11 Draft Tier 1 Environmental Impact Statement's Recommended Alternative through Avra Valley

In a scoping letter dated 30 May 2017, the Trustees of the Arizona-Sonora Desert Museum (ASDM) identified likely adverse impacts of routing I-11 through Avra Valley on the Sonoran Desert ecosystem west of Tucson, the health of which is essential to the Museum's ability to fulfill its mission to "inspire people to live in harmony with the natural world by fostering love, appreciation and understanding of the Sonoran Desert".

O-30-1

Given the significance of these impacts, the Board of Trustees of the Arizona-Sonora Desert Museum opposes the preferred alternative through Avra Valley which was identified in the Draft I-11 Tier 1 Environmental Impact Statement (DEIS). Here we reiterate our concerns about possible detrimental impacts if I-11 follows this Recommended Alternative route. We also request that additional analyses be undertaken before the alternative for the Sahuarita-Marana segment is finalized.

In our scoping letter we identified the following potential adverse impacts of the Recommended Alternative:

O-30-2

- Significant reduction in numbers of visitors to ASDM (currently about 400,000 per year), many of whom come from out-of-area to experience being immersed in the iconic Sonoran Desert at the ASDM, Saguaro National Park, and Tucson Mountain Park. These visitors contribute very significant ecotourism dollars to the local economy;

O-30-3

- Further fragmentation of, and loss of biodiversity in, natural Sonoran Desert lands in Tucson Mountain Park, Saguaro National Park, Ironwood Forest National Monument, the Bureau of Reclamation Wildlife Mitigation Corridor, the Tohono O'odham Nation, the Santa Cruz River, and the Avra Valley;

2023 N. Ginney Road
 Tucson, AZ 85743 8918
 Phone: (520) 883-1380
 Fax: (520) 883-2500
 www.desertmuseum.org

ID	Topic	Response
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O-30-1	Recommended Alternative	GlobalTopic_4, GlobalTopic_1
O-30-2	Recreation	GlobalTopic_1, R1 and R2
O-30-3	Biologic Resources	GlobalTopic_1, BR-1, BR-5, BR-6, BR-10, WR-3, V-1, N-1, CR-1 and BR-9

ID	Comment Document
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I-11 Tier 1 EIS Study Team
 c/o ADOT Communications
 June 17, 2019
 Page 2

O-30-3

- Degradation of land and water resources in the Avra Valley due to construction activities, vehicle emissions, roadway runoff, light and noise pollution, and the spread of invasive plant species like Sahara mustard (*Brassica tournefortii*) and buffelgrass (*Pennisetum ciliare*), the latter fueling saguaro-destroying wildfires;
- Reduction in the conservation effectiveness of the Sonoran Desert Conservation Plan, Pima County’s award-winning plan for balancing the conservation and protection of our cultural and natural resource heritage with our efforts to maintain an economically vigorous and fiscally responsible community.

Given the potential impacts of the Recommended Alternative in the Tier 1 DEIS, we ask that you analyze and address the following issues before finalizing your choice for the Sahuarita-Marana segment.

O-30-4

- Please include in your analyses the costs of truly mitigating the detrimental environmental and wildlife-corridor effects of the Avra Valley route.
- Please include in your cost-benefit analyses the probable impacts of the Avra Valley route on such aspects of the Tucson area economy as lost ecotourism revenue, lost revenue from routing traffic around and away from Tucson proper, increased costs of fire management from spread of invasive plants, and environmental degradation.
- Please include in your cost-benefit analyses the implications of compromised water quality and availability on the City of Tucson’s water recharge and water sourcing system in Avra Valley.
- Please include in your cost-benefit analyses the “lost opportunity” costs of failing to plan for multi-modal transportation links between Nogales, Tucson, and Phoenix that take advantage of existing rail corridors.
- Please include in your cost-benefit analyses the “lost opportunity” costs of not improving the existing I-10 corridor through Tucson’s city center to move toward the goals articulated in the “Imagine Greater Tucson” planning effort and “Tucson General Plan” document.
- Please identify alternatives other than the Avra Valley bypass to provide for redundant emergency and defense routes and include them in your cost analyses.

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O-30-4	Economics	GlobalTopic_1, BR-10, WR-1, AC-9 and AC-3
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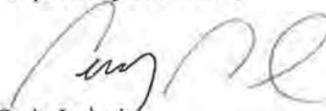
I-11 Tier 1 EIS Study Team
 c/o ADOT Communications
 June 17, 2019
 Page 3

O-30-4

- Please address the discrepancies in the DEIS's cost analysis for the alternative routes and those presented in the I-11 Supercorridor Study done by the University of Arizona's Interdisciplinary Urban Design Studio that was completed in Spring 2014, in collaboration with the Sonoran Institute, ADOT, ASU, and UNLV (see attached). For example, the DEIS estimates the construction cost of Avra Valley alternative C will be \$2.4 billion, vs. \$4.2 billion in the 2014 Supercorridor Study.

We recognize the opportunity for our community to benefit from increased trade along the I-10 corridor, and the need for infrastructure improvements to facilitate this. We believe that these improvements, which can also achieve the primary objectives of the I-11 proposal, have the potential to benefit our downtown and neighborhoods that are most impacted by the current or any future highway developments. In fact, I-10 improvements in the future could mitigate negative impacts of the current I-10 infrastructure as voiced by some community groups. Options such as below-grade segments; management of traffic flows through new technologies, pricing, scheduling, etc.; other local road improvements to keep local traffic off I-10; and enhancements to our rail system should all be strongly considered in a holistic regional transportation framework.

Respectfully submitted,



Craig Ivahyi
 Executive Director



Kevin E. Bonine, Ph.D.
 Chair, Board of Trustees

Attachment:
 I-11 Supercorridor Study

ID	Comment Document
	Tucson Public Hearing, May 8, 2019

ID	Topic	Response
O-16-1	Recreation	GlobalTopic_1, N-1, BR-2, AQ-2,AC-3, R-2, and E-2

O-16-1

6 DEBRA C. COLODNER:

7 Good evening. My name is Debbie Colodner, and

8 I'm director of conservation at the Arizona Sonoran

9 Desert Museum. Thanks for listening today.

10 The museum is an iconic regional tourism

11 driver, with 20,000 member households. We have

12 serious concerns about the economic and environmental

13 impacts of the Avra Valley route on both the museum

14 and Sonoran Desert ecosystems we interpret and

15 protect. These concerns are based on the effects of

16 the highway itself, as well as the ensuing development

17 and sprawl around it.

18 People come to the dessert museum to be

19 transported, to be amazed, to learn and to heal. One

20 of our volunteers recently wrote, I come to experience

21 a very special place of healing, healing not only for

22 nature, but equally important for humans. You've

23 probably read about the members weekly who visit for

24 similar reasons, including a Vietnam vet who is

25 convinced that the Desert Museum has saved his life.

ID	Comment Document
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ID	Topic	Response
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0-16-1

1 The impact of a highway on visitor experience
 2 was brought home to me recently when I was touring
 3 with a colleague from the Santa Barbara zoo. She
 4 remarked how beautiful he museum was and how she felt
 5 fully immersed in nature. I responded that I was
 6 recently looking at photos of her zoo, and that it
 7 looked beautiful as well. And she replied yes, but
 8 you don't have the highway noise. And that made me go
 9 "huh."
 10 The Desert Museum is a long-time supporter of
 11 the Sonoran Desert Conservation Plan, Pima County's
 12 carefully negotiated plan for protecting our cultural
 13 and national resource, while fostering economic
 14 prosperity. The Avra Valley route will sever critical
 15 wildlife corridors identified in and protected by this
 16 plan. It will also roll out a red carpet for invasive
 17 grasses that threaten to transform our cactus forest
 18 to grasslands.
 19 It is our belief that the scoping process was
 20 too narrow and does not adequately address issues such
 21 as climate change, local economic development, new
 22 transportation technologies, or the long-term costs of
 23 environmental mitigation. Some of the these were
 24 addressed in previous analyses, such as the 2014 I-11
 25 Super Corridor Study, which came to a different

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ID	Topic	Response
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Page 46

0-16-1

1 conclusion.
2 We'd like to request consideration of the data
3 and alternatives presented in that study. After all,
4 how many healing places do we have, and how many are
5 next to a highway? Thank you.

ID	Comment Document
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ID	Topic	Response
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3131 South Central Avenue
Phoenix, AZ 85040
602.468.6470
az.audubon.org

- O-37-1

July 5, 2019

I-11 Tier 1 EIS Study Team
c/o ADOT Communications
1655 W. Jackson Street
Mail Drop 128F
Phoenix, AZ 85007

RE: Central Segment I-11 Corridor Tier 1 Environmental Assessment.
- O-37-2

We regret that Audubon Arizona has belatedly become aware of the route following the Gila River being selected as the recommended alignment. We feel that public and agency engagement for this segment was inadequate. We provided extensive comments for the segment from Las Vegas to Wickenburg and in that letter noted our strong preference for using the existing Highway 85 alignment (Orange alternative in recent maps). A copy of that letter is included.

Subsequent community engagement has been focused on Pima County and southwestern Pinal County and our sister Audubon chapter, Tucson Audubon Society, was engaged in those meetings. I have perused the public engagement process and I cannot find any specific public meetings held in Maricopa County in the west valley for the central segment prior to the decision for the preferred alternative.
- O-37-3

We do thank you for noting the six Important Bird Areas that are within or proximate to the study corridor for I-11, including the Lower Salt and Gila Riparian Ecosystem IBA. This IBA is globally significant because of the population of Yuma Ridgway's Rail, a federally endangered bird. This IBA has migratory and potential breeding habitat for Southwestern Willow Flycatcher (Endangered) and Western Yellow-billed Cuckoo (Threatened).

The Yuma Ridgway's Rail was listed prior to critical habitat designations. Table 3.14-4 showing only critical habitat affected gives an incomplete picture of the impact of I-11 to Yuma Ridgway's Rail. The recommended corridor alignment from Highway 85 east to the Gila River crossing on the Rainbow Valley Road alignment includes or is immediately adjacent to known Yuma Ridgway's Rail detections. This bird requires emergent marsh habitats and reliable water supply for those habitats. Many of the suitable locations for this bird are in association with agricultural irrigation return drains in the mapped floodplain for the Gila River. Audubon Arizona is developing a GIS predictive model for potential suitable habitat for this bird. We hope to have a completed map by this fall. We strongly recommend a more comprehensive analysis of the impact the recommended corridor will have to Yuma Ridgway's Rail habitats.
- O-37-4

The alignment of I-11 will bisect the agricultural land that is irrigated by the Buckeye Water Conservation & Irrigation District and disrupt the delivery canal system and most importantly the drains for wells pumping waterlogged land. Because of water diversions the water pumped and returned to the river in this area is essential for the existence of marsh and riparian vegetation in the river corridor. Important drains are located at Watson and Dean Roads.
- O-37-5

The recently completed Green Infrastructure mapping for Maricopa County and surrounding region shows the importance of the Gila River as a remnant open space and connection corridor within the

O-37-1	NA	No response needed.
O-37-2	Coordination and Outreach	GlobalTopic_2 and CO-1 and CO-5
O-37-3	Biologic Resources	GlobalTopic_2, BR-1, BR-2, BR-4, BR-8 and BR-10
O-37-4	Agriculture	GlobalTopic_2
O-37-5	Biologic Resources	GlobalTopic_2 and BR-2

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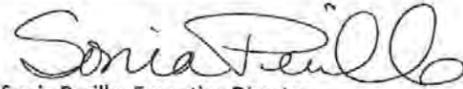
O-37-5

urbanizing matrix. We disagree with the I-11 Biological Analysis that the Gila River is not a wildlife linkage corridor. (Section 3.14. Biological Resources. Figure 3.14-4). Similar to the washes and rivers in the southern section, the Gila River and tributaries (Centennial Wash, Hassayampa River, Agua Fria River) function as wildlife corridors for smaller wildlife species that include coyote, javelina, beaver, and bobcat. The absence of a linkage design for the Gila River needs attention in the I-11 planning, not only for wildlife but also as a human recreation corridor. Maricopa County and municipal partners have invested a great deal of time and effort to develop connected open space in the Gila River corridor, including the Maricopa Trail and the El Rio Project (Avondale, Goodyear, and Buckeye). Audubon Arizona agrees with the analysis in the Draft Tier 1 EIS that the "Orange" route has the lowest impact to wildlife resources and open space. It is for that reason that Audubon Arizona strongly supports that route.

O-37-6

In closing, Audubon Arizona opposes the recommended "Blue" route because of the bisecting of farmlands and proximity to the Gila River flood plain and Yuma Ridgeway's Rail occupied habitat. Audubon Arizona strongly supports the "Orange" route for all segments from Wickenburg to Nogales. Should the "Blue" route proceed as the recommended we request a more comprehensive analysis of impacts and mitigation/compensation measures for the Yuma Ridgeway's Rail.

Yours in Conservation,



Sonia Perillo, Executive Director

Cc:
 Congressman Grijalva
 USFWS Ecological Services
 Arizona Game and Fish Department, Region 6

O-37-6	Recommended Alternative	GlobalTopic_2 and G-1
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ID	Comment Document
Marana Public Hearing, May 11, 2019	

ID	Topic	Response
O-22-1	Alternatives	GlobalTopic_4, BR-2, N-1, AQ-1, V-1, LU-3. BR-9, WR-2, R-2 and GlobalTopic_1

O-22-1

24 MS. DELLA GROVE: Hello. I'm Della Grove, a
 25 resident of Picture Rocks and president of Citizens for

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ID	Topic	Response
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O-22-1

1 Picture Rocks, an organization that's taken a stand
 2 against the proposed route through our beautiful valleys.
 3 The recommended alternative route would damage both
 4 natural resources and degrade visitor experience on a wide
 5 array of public lands, especially those located in the
 6 Tucson Mountains. Building a freeway through zero
 7 reclamation dedication land would violate the purpose for
 8 which these lands were set aside. It is impossible to
 9 adequately mitigate the impact from a federal freeway to
 10 lands already mitigated for another federal project, the
 11 Central Arizona Project.

O-22-2

12 The recommended alternative route would save
 13 critical wildlife for us. This fragmentation would
 14 destroy the ability of wildlife species, such as desert
 15 big horn sheep, to disburse, roam, find new mates, and
 16 expand their home ranges.

O-22-1

17 The recommended alternative project costs
 18 3.4 billion dollars more to build than co-locating I-11
 19 with I-19 and I-10 through Tucson. Downtown Tucson and
 20 even the powerhouses such as the Arizona Sonoran Desert
 21 Museum and Saguaro National Park will see reduced revenues
 22 and negative economic impacts.

23 The recommended alternative route would
 24 cause significant noise, air and light pollution,
 25 encourage urban sprawl, and destroy the rural character of

O-22-2	Alternatives	GlobalTopic_1
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ID	Comment Document
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ID	Topic	Response
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O-22-1

1 the Altar and Avra Valleys. Lands and wildlife habitat
 2 would be severely impacted by the recommended alternative
 3 route, including mitigation lands in Pima County Section
 4 10, habitat conservation land.

5 The City of Tucson has voiced opposition to
 6 this route, as it places a freeway adjacent to the city's
 7 major water supply, and they cannot guard against a toxic
 8 spill that would threaten Tucson's most vital resource.

9 The recommended alternative route is located
 10 perilously close to a wide array of public lands, federal
 11 lands, Saguaro National Park West, Ironwood Forest
 12 National Monument, and the Tucson Mitigation Corridor. In
 13 case of the -- in the case of the Saguaro National Park
 14 West, the route comes within 1,300 feet of the park
 15 boundary. In the case of the Ironwood Forest National
 16 Monument, the route comes within 400 feet of the monument
 17 boundaries and tribal lands owned by the Pascua Yaqui
 18 Tribe and Tohona O'Odham Nation.

19 In 2016, two desert big horn sheep ram were
 20 photographed in numerous locations in the Tucson
 21 Mountains. It is highly likely that these rams used
 22 existing wildlife corridors between Ironwood Forest
 23 National Monument, where desert big horn sheep exist, and
 24 the Tucson Mountains to travel to the southern section of
 25 the Tucson Mountains.

ID	Comment Document
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ID	Topic	Response
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O-22-3

1 The impact would cause economic loss to
 2 Tucson by diverting traffic away from Tucson's downtown
 3 business districts and lead to negative economic impact on
 4 tourism to places such as the Arizona Sonoran Desert
 5 Museum and Saguaro National Park.
 6 And last but not least, it would encroach on
 7 the private property rights of thousands of private
 8 property owners along its entire north/south, lowering
 9 property values and destroying the rural character of
 10 lands in Avra Valley and Picture Rocks and other areas in
 11 Pima County, along with areas to the north.
 12 Thank you.

O-22-3	Economics	GlobalTopic_1, E-1, E-2, LU-1 and LU-3
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ID	Topic	Response
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O-3-1	Avra Valley	GlobalTopic_4, E-1, WR-2, R-2, V-1, BR-2, AQ-1, N-1 and GlobalTopic_1
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Citizens for Picture Rocks

Citizens for Picture Rocks Statement of Policy Opposing Interstate Highway in the Avra Valley
August 15, 2017

Citizens for Picture Rocks is a non-profit 501(c)(4) membership civic improvement organization dedicated to improving the quality of life in the community. Our members have told us that they believe constructing Interstate highway I-11 through the Avra Valley will have significant negative impacts as laid out in Pima County Board of Supervisors Resolution 2007-343: "... the Pima County Board of Supervisors opposes the construction of any new highways in or around the County that have the stated purpose of bypassing the existing Interstate 10 as it is believed that the environmental, historic, archaeological and urban form impacts could not be adequately mitigated."

The Arizona Dept, of Transportation and the Federal Highway Administration are in the middle of a three-year, \$15 million, Tier One Environmental Impact Study for Interstate 11 as required by the National Environmental Protection Act. Two of their three very similar alternative routes are through the Avra Valley and the third is along the existing Interstate 10 corridor. There is always a "No Build" option as well.

Concerns have come from many directions, including about 1,000 comments from residents of Picture Rocks. The City of Tucson worries about loss of tax revenue and tourism, and about the effects on their water supply. I-11 will negatively affect tourism at Saguaro National Park, Tucson Mountain Park, Arizona-Sonora Desert Museum, and Ironwood Forest National Monument. Increased night light will hurt Kitt Peak observatory. Arizona Game and Fish Dept., US Bureau of Land Management, National Park Service, US Bureau of Reclamation, US Environmental Protection Agency and Coalition for Sonoran Desert Protection are among those expressing concerns about closing off wildlife movement corridors and prefer using the already-disturbed I-10 corridor rather than endangering natural and cultural resources.

As County Administrator Chuck Huckelberry's proposed Avra Valley route plan admits, with the Bureau of Reclamation's Wildlife Mitigation Corridor on one side, established "in perpetuity" when the CAP canal was built, and the Tohono O'odham Nation's Garcia Strip on the other, insufficient Right-of-Way would mean building an elevated highway along Sandario Roads in the Mile Wide Road area.

The thousands of families in the Picture Rocks – Avra Valley areas would be subjected to unsafe and unhealthy intrusions of hazardous cargo along with air and noise pollution, with probable increases in drug and human smuggling. The rural peace of our neighbors would be gone forever with dozens facing eviction. Truckers would have more miles to drive.

District 3 Congressman Raúl Grijalva told ADOT that "The proposed route of the Interstate would bring in new development, roads, traffic, and have a negative impact on dark skies, wilderness values and quality of life for residents of that community."

L.D. 11 State Representative Mark Finchem pointed out to ADOT that expanding I-10 "is the least expensive option to increase capacity and improve safety for all...we will be taking on massive debt to build this roadway." State Senator Steve Smith and Representative Vince Leach had earlier told residents that they opposed any Avra Valley route.

O-3-1

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ID	Topic	Response
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O-3-1

In 2008, when a virtually identical Avra Valley highway was being pushed by real estate speculators as an I-10 Bypass, ADOT's State Engineer Jennifer Toth told the State Transportation Board that double-decking I-10 from Ruthrauff to I-19 would do everything ADOT wants at one-third the cost, saving taxpayers nearly \$2 billion.

Citizens for Picture Rocks joins with those state and federal agencies, the City of Tucson, our neighbors, and with Friends of Ironwood Forest, Friends of Saguaro National Park, Sierra Club, Friends of Tucson Mountain Park, National Parks Conservation Association, Coalition for Sonoran Desert Protection, Sky Island Alliance, Avra Valley Coalition, Arizona Daily Independent News and many others who urge that ADOT turn its attention away from the Avra Valley, and instead look at the far-less-expensive or damaging I-10 corridor alternative or the No-Build option. We will work in coalition with any and all willing to protect our homeland. We urge area residents to contact their legislators and say:
 No I-11 in the Avra Valley!

ID	Comment Document
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Coalition for Sonoran Desert Protection

758 N. 5th Ave., Suite 212
Tucson, Arizona 85705
520.388.9925 sonorandesert.org

- Arizona Center for Law in the Public Interest
- Arizona Native Plant Society
- Bat Conservation International
- Cascabel Conservation Association
- Center for Biological Diversity
- Center for Environmental Ethics
- Defenders of Wildlife
- Desert Watch
- Environmental Law Society
- Friends of Cabeza Prieta
- Friends of Ironwood Forest
- Friends of Madera Canyon
- Friends of Saguaro National Park
- Friends of Tortolita
- Gates Pass Area Neighborhood Association
- Genius Loci Foundation
- Native Seeds / SEARCH
- Protect Land and Neighborhoods
- Safford Peak Watershed Education Team
- Save the Scenic Santa Ritas
- Sierra Club – Grand Canyon Chapter
- Sierra Club – Rincon Group
- Sky Island Alliance
- Society for Ecological Restoration
- Southwestern Biological Institute
- Tortolita Homeowners Association
- Tucson Audubon Society
- Tucson Herpetological Society
- Tucson Mountains Association
- Wildlands Network

April 15, 2019

I-11 Tier 1 EIS Study Team c/o ADOT Communications
1655 W. Jackson Street Mail Drop 126F
Phoenix, AZ 85007

RE: Request for comment deadline extension by 120 days for the I-11 Tier 1 Draft Environmental Impact Statement

To Whom it May Concern:

This comment is being submitted by the Coalition for Sonoran Desert Protection, a non-profit organization based in Pima County, Arizona with 30 member groups representing over 30,000 members. Our mission is to achieve the long-term conservation of biological diversity and ecological function of the Sonoran Desert through comprehensive land-use planning, with primary emphasis on Pima County’s Sonoran Desert Conservation Plan. We achieve our mission by advocating for: 1) the protection and conservation of Pima County’s most biologically rich areas, 2) directing development to appropriate land, and 3) requiring appropriate mitigation for impacts to habitat and wildlife species.

Due to the large footprint of the Preferred Alternative identified in the I-11 Tier 1 Draft Environmental Impact Statement (DEIS) and the destructive and negative consequences to hundreds of thousands of acres of federally protected lands, local open spaces, and private property, **we request that the public comment period for this DEIS be extended by 120 days to September 28, 2019.** The current comment period is only 56 days, or less than 2 months. This is unacceptable and does not give members of the public enough time to thoroughly review the DEIS and write thoughtful, well-informed comments for your review and consideration. Furthermore, the DEIS includes a large volume of materials to review that have not been available to the public until its release on April 5, 2019. Again, please extend the comment period by 120 days to September 28, 2019. Thank you for considering our comments on this issue.

Sincerely,

Carolyn Campbell
Executive Director

O-2-1

ID	Topic	Response
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O-2-1	Comment Period Extension	GlobalTopic_9
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ID	Comment Document
	Nogales Public Hearing, May 7, 2019

ID	Topic	Response
O-62-1	Biologic Resources	GlobalTopic_1, BR-10 and BR-1

O-62-1

14

15 CAROLYN CAMPBELL:

16 My name is Carolyn Campbell, and I'm here

17 representing the Coalition for Sonoran Desert

18 protection. And I just really briefly wanted to make

19 some comments about the stretch from Nogales to

20 Sahuarita. From my understanding of reading the draft

21 EIS, there is going to be no money spent, there is no

22 dollars or funding going on on this particular

23 stretch, and I was hoping to convince you otherwise.

24 I also preface that I will submitting lengthy

25 written comments with was some of the maps that I'm

ID	Comment Document
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ID	Topic	Response
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Page 5

0-62-1

1 going to be referencing. There have been three -- at
2 least three different processes that have identified
3 important wildlife linkages across I-15, basically
4 from Tubac up to just south of Green Valley.

5 The first one was the Arizona
6 Department of Transportation in 2016, called the
7 Arizona Linkages; and the second one was the Sonoran
8 Desert Conservation Plan by Pima County, and that has
9 kind of a broad area of wildlife linkage in the same
10 area, between the Santa Rita mountains and the
11 Sahuarita mountains.

12 And the third was funded by the
13 Regional Transportation Authority in Pima County. I'm
14 sorry I can't remember that date. Yes, I can, because
15 I've got the book here. 2012, I believe. Anyway, I
16 will submit something.

17 So this particular stretch is in all of
18 the build alternatives, so I would encourage that
19 wildlife crossings are incorporated into this section.
20 There have been many studies about the importance,
21 others that have been recently identified. As a
22 matter of fact, in a couple of the studies, they have
23 actually identified the different treatments that they
24 would like to see on each culvert. It's a pretty
25 detailed report.

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1 But really briefly, recent research
 2 carried out by an international team of conservation
 3 scientists and published in Science in 2016 wrote
 4 severely reduced the ability of to function
 5 effectively and provide us vital services for our
 6 survival. Despite substantial efforts to conserve the
 7 world's natural heritage, large tracks of valuable
 8 areas would be unprotected.

9 The impacts can be felt far beyond the
 10 road edge. The area most severely affected is within
 11 a one kilometer band on either side of the road. The
 12 effects of some roads, however, particularly major
 13 highways, penetrate much farther than five kilometers
 14 from the highway's edge. So I just want to make sure
 15 that you're aware of that, and I will submit this in
 16 writing. Thank you.

17 (Comments were concluded at 7:00 p.m.)

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ID	Comment Document
	Tucson Public Hearing, May 8, 2019

ID	Topic	Response
O-13-1	Biologic Resources	GlobalTopic_1 and BR-1

O-13-1

17
 18 CHRISTINA McVIE:
 19 Good afternoon. My name is Christina McVie.
 20 I'm a stakeholder and I'm speaking as president of the
 21 Board of Coalition for Sonoran Desert Protection.
 22 The Sonoran desert evolved without fire as an
 23 ecological factor, and most of its plants cannot
 24 tolerate it. African Buffelgrass is a designated,
 25 regulated, noxious weed in Arizona, and is primarily

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ID	Topic	Response
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O-13-1

1 spread by vehicles along roadways. It is especially
 2 concentrated in the Avra Valley, where it has become
 3 dominant in many areas, crowding out native plant
 4 species, and, because it grows so prolifically,
 5 filling in the naturally occurring spaces between
 6 plants. These empty spaces are important, acting as a
 7 fire break in case of a wildfire.

8 Burquez and Quintana, 1994, state that the
 9 most pervasive threat to the Ironwood communities,
 10 such as those down in Saguaro National Park and the
 11 Ironwood Forest National Monument, is the
 12 encouragement of Buffelgrass and the subsequent
 13 monoculture resulting from its devastating fire
 14 regime.

15 Van Devender and Dimmit, 2000, state that the
 16 introduction of buffelgrass into fire-intolerant
 17 desert communities results in a permanent conversion
 18 to a buffelgrass savannah, with reduced plant cover
 19 and diversity. A survey of roads by the Desert Museum
 20 in 2004 revealed the full extent of the buffelgrass
 21 invasion in southern Arizona at that time, and it has
 22 continued to spread since then.

23 Van Devender and Dimmit, 2006, state the
 24 buffelgrass is quote, The most serious ecological
 25 threat to the Palo Verde Saguaro Ironwood Desert Scrub

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ID	Topic	Response
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O-13-2	Orange Alternative	GlobalTopic_4 and GlobalTopic_1
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O-13-1

1 in the Arizona uplands subdivision of the Sonoran
 2 Desert, end quote. And that, quote, In time,
 3 buffelgrass fires could convert the Arizona upland
 4 into a savannah-like landscape, as all of those plants
 5 are killed. A single buffelgrass fire kills nearly
 6 all native plants in its path.

7 In May of 2008, Saguaro National Park and the
 8 University of Arizona performed several buffelgrass
 9 test burns in the Avra Valley. Some observations
 10 include peak temperatures reached over 1,600 degrees
 11 Fahrenheit, hot enough to melt tin, zinc and aluminum.
 12 The average temperature was between 13- and 14,000
 13 degrees Fahrenheit. The tallest flame height was 25
 14 feet, average flame heights were 8.5 to 11 feet, and
 15 the fires create basically their own weather system.
 16 These fires cannot be outrun. Fire fighters fear
 17 them.

O-13-2

18 My question to the Federal Highway
 19 Administration and ADOT is, will you be responsible
 20 and pay for the damages for the catastrophic fires
 21 that will happen when someone throws out a cigarette,
 22 or a vehicle dragging a chain sparks a fire along your
 23 freeway? The threat of fire is very real. Habitat,
 24 homes and lives are at risk. This is a fatal flaw in
 25 placing I-11 in the Altar and Avra Valleys. It should

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ID	Topic	Response
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O-13-2

1 be co-located with I-10. Thank you.

2

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ID	Comment Document
	Tucson Public Hearing, May 8, 2019

ID	Topic	Response
O-14-1	Biologic Resources	GlobalTopic_1 and BR-9

O-14-1

3 CAROLYN CAMPBELL:
 4 Thank you. My name is Carolyn Campbell, and
 5 I am the executive director of the Coalition for
 6 Sonoran Desert Protection. The Coalition for Sonoran
 7 Desert Protection is an alliance of 35 conservation
 8 and community groups in southern Arizona. The
 9 coalition formed in 1998 to advocate for what is now
 10 the Sonoran Desert Conservation Plan. This plan,
 11 adopted and implemented by Pima County, is a visionary
 12 and award-winning habitat and land-use plan that has a
 13 federal nexus.
 14 U.S. Fish and Wildlife Service approved
 15 and permitted this plan in October of 2016, under the
 16 Endangered Species Act. The coalition has submitted
 17 detailed comments on this project on two occasions
 18 with this information, in the 2013 and again in the
 19 2016 comment periods. Since our first comments, the
 20 Fish and Wildlife Service has issued that federal
 21 permit. The permit includes mitigation lands that
 22 have been set aside via conservation easements for
 23 protection in perpetuity. The coalition as asked that
 24 you consider impacts to these properties, and we have
 25 yet to see that in any of the reports you have issued,

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ID	Topic	Response
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O-14-1

1 including this Draft Environmental Impact Statement.
 2 Again, these protected lands in the federal nexus via
 3 the ESA need to be addressed in the Environment Impact
 4 Statement.

5 Secondly, to state that the impacts to
 6 adjacent preserves with the corridor not going
 7 directly through them are minimal or nonexistent is
 8 rather crazy. Roads have impacts far beyond the
 9 footprint of the road. With interstate highways
 10 versus roads, you can triple that impact up to three
 11 miles in each direction. Many studies have been
 12 published to that effect, and the coalition has been
 13 involved in the discipline of road ecology for many
 14 years, since 2001.

15 This proposed interstate would be
 16 within hundreds of feet both Saguaro National Park and
 17 Ironwood Forest National Monument, is close to Tucson
 18 Mountain Park, and run diagonally -- or would run
 19 diagonally through land that was preserved in the
 20 first place to mitigate the effects of the CAP canal.
 21 This interstate will destroy all this work that we've
 22 all been doing; feds, state, county and the community,
 23 for many decades.

24 And finally, the coalition has worked
 25 closely with ADOT over the last few years to protect

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1 important regional landscape connectivity. ADOT is,
 2 or was, one of the national agency leaders in this
 3 area. For ADOT to be ignoring this with the I-11
 4 proposal in Avra Valley is a reverse of their efforts
 5 in the past. This proposed route should not make it
 6 any further in the process. Thank you.

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	Marana Public Hearing, May 11, 2019

ID	Topic	Response
O-21-1	Cultural Resources	CR-1, GlobalTopic_1, AQ-1, N-1, V-1, BR-3 and AC-3

O-21-1

13 MS. CAROLYN CAMPBELL: My name is Carolyn
 14 Campbell, and I am with the Coalition for Sonoran Desert
 15 Protection. I will read the second half of the statement,
 16 as I was also on the Stakeholder Committee.

17 The study that Kevin was going to refer to
 18 is a complete inventory of known and potential historic
 19 and archaeological resources that could be directly or
 20 indirectly impacted by the project. This study should be
 21 reviewed and approved by the Tucson Historic Preservation
 22 Foundation, the Tucson-Pima County Historical Commission;
 23 the City of Tucson Historic Preservation Office, the Pima
 24 County Cultural Resources and Historic Preservation
 25 Division, and the Arizona State Historic Preservation

ID	Comment Document
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ID	Topic	Response
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0-21-1

1 office.

2 Environmental quality impacts air quality,

3 noise, light pollution, viewshed, wildlife, vegetation,

4 watershed, and the health and biological integrity of the

5 Santa Cruz River. Social and economic equity impact.

6 When studies are completed, there needs to

7 be a demonstrated respect for the natural, historic, and

8 archaeological resources and avoidance of all these

9 resources in any build alternative.

10 Furthermore, we strongly encourage ADOT and

11 Federal Highways to refer to the I-11 Super Corridor study

12 document, which was submitted to ADOT in 2016, the

13 Sustainable Cities Lab, hosted by the University of

14 Arizona, Arizona State University, and the University of

15 Nevada, Las Vegas. I'm going to leave that because we're

16 going to be submitting it.

17 We believe that our community stands to

18 benefit economically from increased trade between the

19 United States and Mexico, and our location means we have

20 much to contribute to and benefit from a vibrant trade

21 corridor. However, we must not let a failure of vision

22 and a lack of attention to practical options limit how we

23 respond to the potential economic opportunities associated

24 with the Interstate 11 proposals.

25 We also believe that civic and business

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1 organizations, including the groups we represent, should
 2 take the initiative to further explore these and other
 3 options available to us, including a congestion relief
 4 study that would model realistic and less costly options
 5 to improve the flow of goods through town; a community
 6 design charette that illustrates how we might redesign
 7 I-10; and an economic benefits study focused on
 8 facilitation of moving goods through the center of the
 9 city and the reconnection of downtown areas now divided by
 10 the existing freeway.

0-21-1

11 In the months to come, we will be reaching
 12 out to business and civic leaders to secure their
 13 involvement and support in these efforts. By working
 14 together, we can make our community a better place to
 15 live, work and trade.

16 We appreciate the opportunity to have
 17 participated in the ADOT/FHWA stakeholder process in order
 18 to provide valued input into this transportation proposal.
 19 Thank you.

20 And I will be submitting this on behalf of
 21 representatives from the Coalition for Sonoran Desert
 22 Protection; Avra Valley Coalition; Tucson Historical
 23 Preservation Foundation, Menlo Park Neighborhood
 24 Association, National Parks Conservation Association,
 25 Erickson Terrascape, Tucson Audubon Society, Friends of

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1 Ironwood Forest, Drachman Institute, Statistical Research,
2 and Friends of Saguaro National Park.
3 Thank you.

ID	Comment Document
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Arizona Center for Law in the Public Interest | Arizona Native Plant Society | Bat Conservation International | Cascabel Conservation Association | Center for Biological Diversity | Center for Environmental Ethics | Defenders of Wildlife | Desert Watch | Environmental Law Society | Friends of Cabeza Prieta | Friends of Ironwood Forest | Friends of Madera Canyon | Friends of Saguaro National Park | Friends of Tortolita | Gates Pass Area Neighborhood Association | Genius Loci Foundation | Native Seeds / SEARCH | Protect Land and Neighborhoods | Safford Peak Watershed Education Team | Save the Scenic Santa Ritas | Sierra Club - Grand Canyon Chapter | Sierra Club - Rincon Group | Sky Island Alliance | Society for Ecological Restoration | Southwestern Biological Institute | Tortolita Homeowners Association | Tucson Audubon Society | Tucson Herpetological Society | Tucson Mountains Association | Wildlands Network

July 4, 2019

Interstate 11 Tier 1 EIS Study Team
 c/o ADOT Communications
 1655 W. Jackson St., MD 126F
 Phoenix, AZ 85007

RE: Comments on the Interstate 11 Tier 1 Draft Environmental Impact Statement, Nogales to Wickenburg

To Whom It May Concern:

We appreciate the opportunity to provide comments on the *Interstate 11 Tier 1 Draft Environmental Impact Statement (DEIS), Nogales to Wickenburg*. We submit the enclosed comments on behalf of the Coalition for Sonoran Desert Protection and the undersigned organizations.

Overview

In summary, we are in strong opposition to the Recommended Alternative route identified in the I-11 Tier 1 DEIS ("DEIS"). Our opposition is rooted in the major negative environmental and economic impacts that would inevitably occur if the Recommended Alternative route is successfully built and our belief that other transportation alternatives, including improving and expanding existing interstates, a focus on multi-modal solutions, and the inclusion of expanded rail service, could more effectively achieve the goals identified in the DEIS.

The Recommended Alternative route would have grave and devastating impacts to Pima County that cannot be adequately mitigated. These include:

- Impacts to federal lands such as Saguaro National Park, Ironwood Forest National Monument, and the Bureau of Reclamation's Central Arizona Project Mitigation Corridor.
- Impacts to local conservation lands such as Tucson Mountain Park and Pima County's Conservation Lands System.
- Impacts to planned mitigation lands for Pima County's Incidental Take Permit and Multi-Species Habitat Conservation Plan, which was finalized in October 2016 and is now being actively implemented, along with planned mitigation lands for an Incidental Take Permit submitted by the City of Tucson to the U.S. Fish and Wildlife Service in 2014 (currently under review).

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O-35-1	Recommended Alternative	GlobalTopic_1
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O-35-1

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ID	Topic	Response
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O-35-1

- Impacts to critical wildlife linkages and connectivity between large wildland blocks as described in the 2006 Arizona’s Wildlife Linkages Assessment (completed by a diverse group of statewide stakeholders) and the 2012 Pima County Wildlife Connectivity Assessment (conducted by the Arizona Game and Fish Department (AGFD)), including the Coyote-Ironwood-Tucson Wildlife Linkage and the Ironwood-Picacho Wildlife Linkage.
- Impacts to increasingly rare riparian habitat.
- Impacts to an unknown number of rare archaeological sites.
- Impacts to Tucson Water’s CAP water recharge facilities in Avra Valley, groundwater, and surface water, including inevitable spills from trucks carrying gases, dangerous chemicals, petroleum products and other toxins that will contaminate the regional aquifer serving drinking water to a major metropolitan area, including water banked by Metro Water, Marana, Tucson, Oro Valley, and Phoenix.
- Impacts to Tucson’s businesses and economy and its position as an international port and center for commerce and logistics, including impacts to tourism powerhouses such as Saguaro National Park and the Arizona-Sonora Desert Museum.
- Impacts to established and long-standing rural communities and private property owners in Avra Valley and surrounding areas.
- Increasing the risk of devastating wildfires, given the extensive buffelgrass infestation present in Avra Valley.

We believe that these impacts cannot be adequately mitigated.

O-35-2

Purpose and Need
 First and foremost, we strongly believe that ADOT and FHWA have failed to clearly and thoroughly demonstrate the need for construction of an entirely new freeway, based on the best available science and data. ADOT and FHWA should analyze not only the most current transportation and growth models and current and projected traffic volumes, but also changing transportation modes. For example, if the Mariposa Point of Entry was fully staffed and operational 24 hours a day (which it currently is not), the currently required overnight parking would be reduced, spreading out traffic volumes throughout the day (and also decreasing air pollution since refrigerated trucks have to stay running all night long while they are parked), and negating the need for this proposal at all. Additionally, autonomous truck testing is currently occurring in southern Arizona, is expected to continue, and could safely accommodate truck traffic at night or in a designated lane.¹

The following planned projects should be analyzed by ADOT and FHWA:

- Plans to continue widening Interstate 10.

¹ <https://www.wired.com/story/embark-self-driving-truck-deliveries/>
https://tucson.com/business/pcc-tusimple-team-up-to-offer-self-driving-truck-operations/article_fb05bf3e-ba44-5dfd-ab23-dd6975cd509a.html

<https://www.tucsonweekly.com/tucson/hands-off-the-wheel/Content?oid=25111164>

O-35-2	Purpose and Need	GlobalTopic_4, AC-3, and AC-9
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ID	Comment Document
O-35-2	<ul style="list-style-type: none"> • Elements of ADOT’s 2017-2021 Five Year Plan to include, but not be limited to, State Route 189: Nogales to Interstate 19; Interstate 19: Ajo Way traffic interchange, and; Interstate 10: State Route 87 to Picacho, Earley Road to Interstate 8, Ina Road traffic interchange, Houghton Road traffic interchange, Ruthrauff Road traffic interchange, Kino Parkway traffic interchange, and Country Club Road traffic interchange. • ADOT’s 2011 “State Rail Plan,” which was developed to address the needs of both freight and passengers.² <p>Also, of note is Representative Ann Kirkpatrick’s July 5, 2016 announcement of \$54 million secured in a highway grant for ADOTs I-10 Phoenix to Tucson Corridor Improvements Project, via the U.S. Department of Transportation’s competitive FASTLANE program. Tucson Mayor Rothschild said, “Completing expansion of I-10 between Tucson and Phoenix, which now alternates between two and three lanes in each direction, will result in a safer, more efficient highway for people and freight, and that’s very good news for Tucson, Phoenix and the state as a whole.”³</p>
O-35-3	<p>Concerns with the overall NEPA process</p> <p>We have serious concerns about the larger NEPA process and the premature identification of a “Recommended Alternative” route without adequate scientific and economic analysis and environmental studies. We question the ability of the involved agencies to present thorough information to the public about the myriad impacts of the Recommended Alternative route, and other considered alternatives, given the inadequate analysis presented in the DEIS. We fully support and incorporate by reference the full comments on the I-11 DEIS submitted by the National Parks Conservation Association in July 2019, including a more detailed analysis on this issue.</p>
O-35-4	<p>Major Environmental Impacts from the Recommended Alternative Route</p> <p><i>Impacts to Federal and Local Protected Areas</i></p> <p>The Recommended Alternative route would have significant direct, indirect and cumulative impacts to a wide portfolio of federal and local protected areas and the significant biological and cultural resources they contain. The Recommended Alternative route would negatively impact Saguaro National Park, Tucson Mountain Park, Ironwood Forest National Monument, the Bureau of Reclamation’s Central Arizona Project Mitigation Corridor, and mitigation lands for Pima County’s federal Incidental Take Permit (ITP) and Multi-Species Habitat Conservation Plan, which was finalized in October 2016. Pima County is now actively implementing this 30-year Multi-Species Conservation Plan and <i>mitigation lands in Avra Valley are critical to its long-term success with special emphasis on riparian areas</i>. The City of Tucson submitted their Avra Valley Habitat Conservation Plan to the FWS in November 2014, and this HCP is currently under</p> <p>² See: https://www.azdot.gov/docs/planning/state-rail-plan.pdf?sfvrsn=0. This rail plan was based off of this study completed in 2010: https://www.azdot.gov/docs/planning/rail-framework-study-final-report.pdf?sfvrsn=0</p> <p>³ See http://www.wbtv.com/story/32378220/southern-az-receives-grant-to-improve-i-10-between-phoenix-and-tucson.</p>

ID	Topic	Response
O-35-3	NEPA Process	GlobalTopic_1
O-35-4	Biologic Resources	GlobalTopic_1 and BR-9

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O-35-4 review. Meanwhile, Tucson Water's operations in Avra Valley are planned and conducted as if the HCP is already in full effect. All of these protected lands are public investments in conservation.

We strongly emphasize that we and many others have commented in the past that local conservation lands are as important to consider as federal conservation lands in Pima County. Unfortunately, impacts to local conservation lands have not been adequately addressed and analyzed in the documents related to this process, including the DEIS. This has become even more true since the EIS Scoping comment period in 2016. Since then, Pima County has received their federal Incidental Take Permit and is now actively implementing their 30-year Multi-Species Conservation Plan. The success of this plan depends on the health and integrity of Pima County's mitigation lands, many of which are in Avra Valley and directly in the path of the Recommended Alternative route. It is disappointing to see a total lack of acknowledgement of these important local conservation lands in the DEIS and in recent public presentations and materials - any review of environmental impacts should address impacts to local conservation lands in detail, particularly in light of the fact that these protections are a result of a federal Incidental Take Permit.

O-35-5	Biologic Resources	GlobalTopic_1, BR-2 and BR-10
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O-35-5 **Impacts to Wildlife Linkages**

The Recommended Alternative route would sever critical wildlife linkages that have been identified for protection by state and local agencies through various planning processes. Pima County's Sonoran Desert Conservation Plan, a nationally recognized regional conservation plan developed and implemented over the last 19 years, identifies a Critical Landscape Connection across the Central Arizona Project canal in Avra Valley. The Arizona Wildlife Linkages Workgroup, spearheaded by ADOT and AGFD, identified the Avra Valley linkage zone and Ironwood-Tortolita linkage zone in the 2006 Arizona's Wildlife Linkages Assessment. More recently, AGFD's 2012 Pima County Wildlife Connectivity Assessment identified and modeled the Coyote-Ironwood-Tucson Wildlife Linkage Design, including large swaths of land in Avra Valley. The Recommended Alternative route would also sever the Ironwood-Picacho wildlife linkage.⁴

In general, severed wildland blocks create isolated wildlife populations, which then become more susceptible to extinction than connected populations. Connectivity is also necessary for wildlife to move across the landscape as they attempt to adapt to rapidly changing habitat conditions driven by climate change. Thus, the impact of a massive linear feature, such as a new highway severing important movement areas, valley wide, for wildlife, cannot be adequately mitigated off-site. This is especially true in the Tucson Mountains, home to Saguaro National Park and Tucson Mountain Park. Scientists are becoming increasingly concerned about the

⁴ Arizona Wildlife Linkages Assessment: <https://www.azdot.gov/business/environmental-planning/programs/wildlife-linkages>

Pima County Wildlife Connectivity Assessment:
http://conservationcorridor.org/cpb/Arizona_Game_and_Fish_Department_2012-Pima.pdf

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O-35-5 isolation of this wildland block as development pressures increase from the east and north. The Recommended Alternative route would only further cement the total isolation of wildlife that live in the Tucson Mountains. This would result in devastating and irreversible consequences for wildlife diversity, wildlife genetic health, and overall ecosystem resilience in this area.

Impacts to local wildlife linkages are not adequately addressed in the DEIS and adequate mitigation for impacts resulting from the Recommended Alternative route are not possible.

Impacts to Pima County’s Conservation Lands System

O-35-6 The Recommended Alternative route would impact lands identified in the Sonoran Desert Conservation Plan’s Conservation Lands System (CLS). The CLS was first adopted in compliance with Arizona state law by Pima County in 2001 (and further amended in 2005) as a part of the Environmental Element of the County’s required Comprehensive Land Use Plan. The County convened a Science Technical Advisory Team (STAT), comprised of members of the FWS, AGFD, National Park Service, professional biologists and natural resource academics. The CLS consists of a STAT-driven, scientifically based map and set of policy guidelines for Pima County’s most biologically-rich lands. These lands include Important Riparian Areas (IRAs), Biological Core Areas, Multiple Use Management Areas, and Species Special Management Areas. Each land category has recommended open space guidelines that are applied when landowners request a rezoning or other discretionary action from the County.

The CLS is a cornerstone of the SDCP and has guided land use and conservation decisions in Pima County since its adoption. **We reiterate that implementation of the CLS is a foundational piece of Pima County’s federal ITP under Section 10 of the Endangered Species Act. Impacts to Pima County’s SDCP and the CLS are not adequately addressed in the DEIS. The Recommended Alternative route would damage CLS mitigation lands to such an extent that the integrity of Pima County’s federal ITP permit would be compromised. Again, adequate mitigation for these impacts is not possible.**⁵

Impacts to Riparian Habitat

O-35-7 The Recommended Alternative route would undoubtedly destroy and/or degrade important, and increasingly rare, riparian habitat. Some 80% of vertebrate species in the arid southwest

⁵ Pima County’s Conservation Lands System Map and Policies:
https://webcms.pima.gov/UserFiles/Servers/Server_6/File/Government/Office%20of%20Sustainability%20and%20Conservation/Conservation%20Science/The%20Sonoran%20Desert%20Conservation%20Plan/CLS_Bio_0211_LowRes.pdf

The full text of the MSCP, Annual Reports, maps, and other important information can be found at:
<http://webcms.pima.gov/cms/one.aspx?portalId=169&pageId=52674>

More information on Pima County’s Sonoran Desert Conservation Plan can be found at:
http://webcms.pima.gov/government/sustainability_and_conservation/conservation_science/the_sonoran_desert_conservation_plan/

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O-35-6	Biologic Resources	GlobalTopic_1 and BR-9
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O-35-7	Biologic Resources	GlobalTopic_1
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O-35-8	Biologic Resources	GlobalTopic_1 and BR-4
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O-35-7

region are dependent on riparian areas for at least part of their life cycle; over half of these cannot survive without access to riparian areas (Noss and Peters 1995).

The Arizona Partners in Flight Bird Conservation Plan states:

“Riparian woodlands comprise a very limited geographical area that is entirely disproportionate to their landscape importance... and immense biological interest (Lowe and Brown 1973). It has been estimated that only 1% of the western United States historically constituted this habitat type, and that 95% of the historic total has been altered or destroyed in the past 100 years (Krueper 1993, 1996). Riparian woodlands are among the most severely threatened habitats within Arizona. Maintenance of existing patches of this habitat, and restoration of mature riparian deciduous forests, should be among the top conservation priorities in the state.”⁶

Riparian habitat is valued for its multiple benefits to people as well as wildlife; it protects the natural functions of floodplains, provides shelter, food, and natural beauty, prevents erosion, protects water quality, and increases groundwater recharge. Riparian habitat contains higher water availability, vegetation density, and biological productivity. Pima County has developed riparian conservation guidelines that make every effort to protect, restore, and enhance on-site the structure and functions of the CLS’s IRAs and other riparian systems. Off-site mitigation of riparian resources is a less favorable option and is constrained by the lack of riparian habitat available with which to mitigate. Every effort should be made to avoid, protect, restore, and enhance the structure and functions of riparian areas. The CLS set aside guideline for IRAs is 95% of any given area of impact.

The lack of consideration of the certainty of flooding in the Altar and Avra Valleys and the subsequent isolation of people and properties from public health and safety responders, not to mention the potential costly relocation of existing infrastructure for the CAP canal, Tucson Water, Marana Water and other regional water providers, numerous El Paso/Kinder Morgan boosting stations, and various electric utility substations is just one example of the flawed NEPA process. This woeful lack of analysis of social, cultural, scientific and economic impacts in the choice of an alternative without adequate due diligence is negligent and should be considered a fatal flaw. This DEIS puts the cart before the horse and would have dire consequences for the region.

O-35-8

Impacts to at-risk species

The Recommended Alternative route would negatively impact a range of specific wildlife species and especially those classified as federally “endangered” or “threatened,” those identified by the state of Arizona HabiMap (www.habimap.org) as “species of conservation concern or species of economic and recreational importance,” and those identified by Pima

⁶ http://www.azgfd.gov/pdfs/w_c/partners_flight/APIF%20Conservation%20Plan.1999.Final.pdf

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O-35-8

County and FWS as “vulnerable” under the SDCP and ITP. Some of these species include, but are not limited to:

- Aberts towhee
- Bell's vireo
- Western burrowing owl
- Cactus ferruginous pygmy-owl
- Western yellow-billed cuckoo
- Swainson's hawk
- Rufous-winged sparrow
- Giant spotted whiptail
- Tucson shovel-nosed snake
- Pima pineapple cactus
- Nichol turk's head cactus
- California leaf-nosed bat
- Mexican long-tailed bat
- Pale Townsend's big-eared bat
- Lesser long-nosed bat
- Merriam's mouse
- Jaguar
- Ocelot

Specific impacts to the Tucson shovel-nosed snake

The Tucson shovel-nosed snake (*Chionactis annulata klauberi*) is a small colubrid adapted to the sandy loams of the northeastern Sonoran Desert region of central and southeastern Arizona. It was petitioned for listing as “threatened” or “endangered” under the US Endangered Species Act (ESA) based on its habitat specialization in sandy desert flats subject to agricultural conversion and urban sprawl and its disappearance from the Tucson region (Center for Biological Diversity 2004). The subspecies was defined based on the strong infusion of black pigment on the red crossbands, which may enhance both coral snake mimicry and background-matching via flicker-fusion (Mahrdt et al. 2001). Its geographic range was described by Klauber (1951) and Cross (1979) and additional genetic analysis by Wood et al. (2008, 2014) supported continued recognition of the subspecies but did not define its distributional limits.⁷

⁷ Mahrdt, C.R.; Beaman, K.R.; Rosen P.C.; [et al]. 2001. *Chionactis occipitalis*. Catalog of American Amphibians and Reptiles. 731: 1–12.

Klauber, L.M. 1951. The shovel-nosed snake, *Chionactis* with descriptions of two new subspecies. Transactions of the San Diego Society of Natural History. 11: 141–204.

Cross, J.K. 1979. Multivariate and univariate character geography in *Chionactis* (Reptilia: Serpentes). Dissertation. Tucson, AZ: The University of Arizona. 517 p. http://arizona.openrepository.com/arizona/bitstream/10150/298514/1/azu_td_7916875_sip1_m.pdf [accessed February 2, 2018].

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O-35-8

In 2014 the U.S. Fish and Wildlife Service rejected the snake for ESA listing based on an incorrect range map for the subspecies that included geographic areas within a sister taxon, *C. a. annulata* (USFWS; 2014). In 2018, Bradley and Rosen (in press) produced a more accurate distribution model for the species based on published genetic and distributional data (Figure 1).⁸ They found that 39% of its habitat has been lost to urban development and agriculture and the remaining habitat is in geographically isolated pockets with no genetic connectivity to each other.

The I-11 Recommended Alternative route would have dire consequences for the remaining population of the Tucson shovel-nosed snake through road strikes and further habitat fragmentation. The highway would bisect some of the last intact habitat for the subspecies, including occupied territory within the Avra Valley. Another example of this is evident in the areas between Gila Bend and Maricopa, within and adjacent to the Sonoran Desert National Monument. This has been a reliable place to still see the snake and several individuals have been recorded along highway 238. The Recommended Alternative route would cut through this habitat block and this area would become a population sink as snakes and other wildlife, venturing outside of the monument, would be crushed by trucks and cars.

Further analysis of impacts to the Tucson shovel-nosed snake needs to be completed by the agencies to adequately understand the impacts of corridor alternatives.

Wood, D.A.; Meik, J.M.; Holycross, A.T.;[et al.]. 2008. Molecular and phenotypic diversity in the Western Shovel-nosed snake, with emphasis on the status of the Tucson Shovel-nosed snake (*Chionactis occipitalis klauberi*). *Conservation Genetics*. 9: 1489–1507.

Wood, D.A.; Fisher, R.N.; Vandergast, A.G. 2014. Fuzzy Boundaries: Color and Gene Flow Patterns among Parapatric Lineages of the Western Shovel-Nosed Snake and Taxonomic Implication. *PLoS ONE* 9(5): e97494.

⁸ U.S. Fish and Wildlife Service, Arizona Ecological Services Field Office. 2014. Species Status Report for the Tucson Shovel-Nosed Snake. [Online]. 78 p. Available: <https://www.regulations.gov/document?D=FWS-R2-ES-2014-0035-0002>.

Bradley, C.M. and Rosen, P.R. In Press. Defining suitable habitat and Conservation Status for the Tucson shovel-nosed snake (*Chionactis annulata klauberi*) in the Sonoran Desert. *Biodiversity and Management of the Madrean Archipelago IV conference proceedings*.

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O-35-9	Visual	GlobalTopic_1 and V-1
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O-35-8

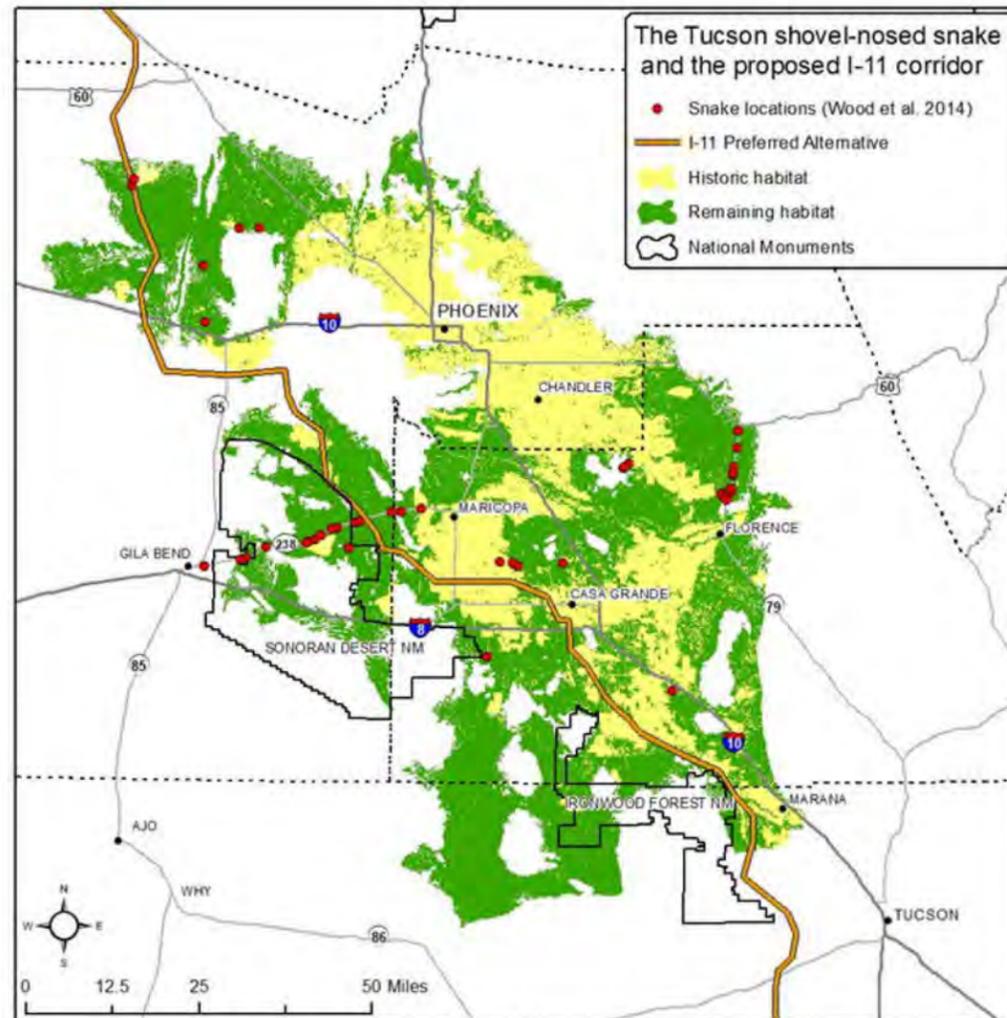


Figure 1: Historic and remaining habitat for the Tucson shovel-nosed snake and the I-11 Recommended Alternative route.

O-35-9

Impacts from noise and light pollution

The Recommended Alternative route would negatively impact resident and migratory wildlife and the wildlife habitats and corridors they use through noise and light pollution. The Recommended Alternative route would especially impact the integrity of the dark skies required for astronomical observatories such as the two reflective telescopes of the MDM Observatory, the Mount Lemmon Observatory, the Kitt Peak National Observatory, the Steward Observatory, the Fred Lawrence Whipple Observatory, and the Massive Monolithic Telescope, through light pollution, both from vehicle headlights, street lighting, and from reasonably foreseeable future commercial and residential development.

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O-35-10	Economics	GlobalTopic_1, E-1 and E-2, LU-3
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Impacts to the economy

The Recommended Alternative route runs adjacent to some of southern Arizona’s long-standing economic powerhouses, such as the Arizona-Sonora Desert Museum, Saguaro National Park West, and Old Tucson. It also comes perilously close to emerging economic engines such as Ironwood Forest National Monument.

A May 28, 2019 press release directly from Saguaro National Park and the National Park Service stated that, “957,000 visitors to Saguaro National Park in 2018 spent \$62.1 million in communities near the park. That spending supported 866 jobs in the local area, \$31.3 million in labor income and had a cumulative benefit to the local economy of \$90.9 million dollars.” The Recommended Alternative route is located within 1,300 feet of the boundary of Saguaro National Park and will have unmitigable impacts on the visitor experience, including increased noise, light, haze and air pollution, increased likelihood of the spread of invasive species such as buffelgrass, increased likelihood of wildfire starts, and decreased quality of viewsheds. None of these impacts can be adequately mitigated.

The Recommended Alternative route is also located within 400 feet of the boundary of Ironwood Forest National Monument, an increasingly popular national monument supported by a robust and active group of volunteers and land managers. A new visitor kiosk was recently installed at IFNM at the Agua Blanca portal and the annual “Meet the Monument” event grows every year, with increasing numbers of participants every year. Building a freeway next to these protected public lands would cause irreparable harm to a place that is gaining momentum and actively investing in the visitor experience.

On April 17, 2019, local newspaper the AZ Daily Star reported on a recent U.S. News and World Report article that identified the Arizona-Sonora Desert Museum as one of the best 30 zoos nationwide. The Recommended Alternative route is located within approximately a half-mile of the Arizona-Sonora Desert Museum. Construction of this route would cause increased noise, light, and air pollution, increased likelihood of the spread of invasive species such as buffelgrass, increased likelihood of wildfire starts, and decreased quality of the viewshed at the museum. None of these impacts can be adequately mitigated.

The Recommended Alternative route would also drive traffic AWAY from Tucson’s downtown and growing business districts that rely on traffic from I-19 and I-10 to survive. The City of Tucson resolution adopted unanimously by the Mayor and Council on June 19, 2019 clearly states opposition to the Recommended Alternative route and includes the following statements:

“...Tucson believes in an urban form that conserves natural resources, improves and builds on existing public infrastructure and facilities, and provides an interconnected multi-modal transportation system to enhance the mobility of people and goods.

...Tucson seeks to protect its CAP water recharge facilities in Avra Valley, groundwater, surface water, and stormwater from contamination.

O-35-10

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O-35-10

...In April 2012 the Mayor and Council passed a resolution to adopt the Downtown Gateway Redevelopment Area and central business district.

...Tucson seeks to capitalize on Tucson’s strategic location by maintaining and enhancing Tucson as an international port and center for commerce and logistics.

...Tucson supports the expansion of passenger and freight multi-modal transportation services to better connect Tucson to regional and international markets and destinations.

...[The] cost of building a new highway in Avra Valley would be enormous, would promote urban sprawl, and would divert cars and trucks away from existing businesses in Tucson.

...[The] state of Arizona could reduce highway traffic congestion, reduce the cost of highway maintenance, and save on the costs of rights of way purchases and concrete and asphalt production and installation - while reducing air pollution and greenhouse gas emissions - by instead investing in I-19 & I-10 and developing multi-modal transportation facilities in existing transportation corridors to sustainably accommodate projected increases in freight while providing for much-needed passenger rail traffic.”

These are all economic arguments for either the No Build alternative or co-locating I-11 with I-19 and I-10 and demonstrate the grave economic consequences to the City of Tucson from the Recommended Alternative route. It is impossible to mitigate for these impacts to Tucson’s economy and water supply.

Last, the DEIS needs to improve its analysis of the far-reaching impacts to local governments from building a brand-new freeway in a currently rural area. The Recommended Alternative route would lead to far-flung sprawl development in Avra Valley, creating a whole new need for east-west transportation options and other infrastructure and services, the cost of which would likely be borne by local governments such as the City of Tucson, Town of Marana, and Pima County.

O-35-11

Cost of considered alternatives

Our interpretation of the cost of considered alternatives in the DEIS indicates that the Recommended Alternative route would cost approximately \$3.4 billion MORE to construct than the Orange Alternative that co-locates I-11 with I-19 and I-10 in the Tucson region. This estimate is based on information in Table 2-8 on page 2-33 of the DEIS. For Section A-F2, the Green Build Alternative construction costs are estimated to be \$3,998,431,000 and the Orange Build Alternative construction costs are estimated to be \$585,899,000. This leads to the conclusion that it will cost approximately \$3.4 billion more to construct the Green Build Alternative. **We are also unclear why the DEIS does not clearly outline the costs of the Recommended Alternative route (blue on maps), rather leaving it up to the reader to somehow interpret the costs from the other identified routes and where they overlap with**

O-35-11	Transportation	GlobalTopic_1 and E-3 Please see the cost analysis in Section 6.6 of the Final Tier 1 EIS.
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O-35-12	Section 4(f)	GlobalTopic_1 and GlobalTopic_11
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O-35-11

the Recommended Alternative route. The public should be given clear information for comparison and not be left to make unsure inferences from the incomplete data presented.

One other example of where the DEIS states the costs of considered alternatives in a confusing and incomplete way is in the following section:

Errata 4.5.3

Tunneling – Placing portions of the proposed Project in a tunnel was considered in the property-specific avoidance analysis (Section 4.4.3) as a means to avoid potential impacts to clusters of properties and Historic Districts. FHWA determined that tunneling could result in a use of one or more Section 4(f) properties and, therefore, is not an avoidance alternative. However, even if a way of avoiding use of Section 4(f) properties were to be found, the cost estimate for placing I-11 in a tunnel in Downtown Tucson is approximately \$3.5 to \$5.1 billion, compared to \$240 million for the at-grade concept and \$1 billion for the elevated concept. The extraordinary cost for tunneling indicates that, while tunneling may be feasible, it is not prudent (Avoidance Analysis Factor 4).
 Elevated Structures – Elevating I-11 in Downtown Tucson to avoid impacting Section 4(f) properties was considered in the property-specific avoidance analysis (Section 4.4.3.2 and 4.4.3.3). Although the elevated lanes could avoid direct impacts on adjacent Section 4(f) properties, noise and visual impacts would result in adverse effects to historic buildings and structures. Deep excavations for the elevated structure foundations would impact archaeological resources. For these reasons, an elevated lanes alternative through Downtown Tucson is not an avoidance alternative. The elevated alternative also would impact businesses and residences that are not protected by Section 4(f) and would add \$1 billion to the overall capital cost of the Orange Alternative.

It is unclear what specifically the “\$240 million” is referring to in terms of the specific section of highway considered for an at-grade concept. It should also be noted that even though \$1 billion was added to the Orange Alternative in order to elevate I-11 through downtown Tucson, the capital costs would still be \$2.4 billion LESS than the Recommended Alternative route.

In general, we are disappointed with the presentation of the cost of considered alternatives - they are difficult to interpret and should be more clearly and conclusively discussed so compared costs of alternatives are clear to the reader. The examples highlighted above are not exhaustive by any means and we recommend a thorough overhauling of this entire section of the DEIS.

O-35-12

Inadequate 4(F) analysis

The comparison between impacts to the Tucson Mitigation Corridor (TMC) and impacts to the seven historic properties likely to be used if the Orange Alternative is chosen are inadequate as presented in the DEIS.

Use of programmatic “net benefit” evaluation for TMC is inappropriate

Conducting a “net benefit” programmatic evaluation of the proposed use of the TMC is completely inappropriate for this 4(f) property. First, the federal regulations that govern 4(f)

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O-35-13	Section 4(f)	4F-2, CR-1, GlobalTopic_1 and GlobalTopic_11
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evaluations make clear that the use of programmatic evaluations like the “net benefit” evaluation are to be used only “for certain minor uses of Section 4(f) property.” (23 CFR 774.3(d)) Additionally, per agency guidance, the “net benefit” must be realized on the 4(f) property itself; promising off-site mitigation to offset impacts to a 4(f) property is not the same thing. According to FHWA guidance, a “net benefit” is achieved when the transportation use, the measures to minimize harm, and the mitigation incorporated into the project results in an overall enhancement of the Section 4(f) property... A project does not achieve a “net benefit” if it will result in a substantial diminishment of the function or value that made the property eligible for Section 4(f) protection.”⁹

O-35-12 There is simply no way to achieve a “net benefit” on this 4(f) property, as the use proposed here will, without a doubt, diminish - if not entirely undermine - the ability of the TMC to provide landscape connectivity for wildlife movement. This is especially true considering that this property is itself serving as mitigation for a previous linear project that impacted landscape connectivity in this same area. Regardless of the off-site mitigation promised, it is unlikely that this property will be able to continue to serve as mitigation for that previous project, should this proposed use be approved. **For these reasons, the use of the “net benefit” evaluation for the TMC is simply indefensible. The agencies should conduct an individual evaluation on the TMC property and revise the entire *Draft Preliminary Section 4(f) Evaluation* to consider that individual evaluation.**

Assessment of 4(f) property uses relies on inconsistent information
 Because the agencies relied on the incorrect assumption that a “net benefit” would be achieved for the TMC 4(f) property, the DEIS provides no information whatsoever on the actual impacts that may be inflicted on the TMC. No baseline information on the TMC is provided and no information on potential impacts is provided. Without this information, there is no way for the reader to understand what a “net benefit” even means in this context; thus, it is inappropriate to leave this information out. However, because net benefit is inappropriate, it is imperative that the EIS provide actual information regarding potential impacts, such as what is provided for other potentially impacted 4(f) properties.

O-35-13 For example, Google imagery does not provide adequate information for assessing historic integrity and architectural significance for numerous reasons, and there are other far more valid approaches to evaluating such properties that the agencies could have used instead. Acknowledging one of the many pitfalls of this approach, the DEIS admits that “many [properties] were classified as possibly eligible simply because the Google imagery did not provide a clear view.”

In addition, the DEIS is inconsistent in analyzing the costs and feasibility of tunneling through downtown Tucson but does not include a similar analysis of the costs and feasibility of tunneling under the entire 4(f) Tucson Mitigation Corridor.

⁹ “Section 4(f) Evaluation and Approval for Transportation Projects that Have a Net Benefit to a Section 4(f) Property.” Federal Highway Administration Environmental Review Toolkit. https://www.environment.fhwa.dot.gov/legislation/section4f/4f_netbenefits.aspx.

ID	Comment Document
O-35-13	<p>The DEIS is inconsistent in how it presents information related to the assessment of 4(f) properties. One example of this can be found in a comparison of how information regarding the TMC is represented versus how information regarding the downtown Tucson historic properties is represented. While it is technically true that 15% of the TMC acreage would be within the build corridor (453 out of 2958 acres), far more than just 15% would actually be impacted, considering the purpose for which the TMC was designated (providing landscape connectivity for wildlife movement). In contrast, the EIS asserts that 100% (3 of 3 acres) of the Manning House would be "used;" however, the document goes on to say, "Any ROW expansion east of I-10 would take part of a parking lot associated with the Levi H. Manning House but the house is unlikely to be directly affected." (EIS at 3.7-24.) Therefore, while 100% of this historic property would be within the corridor, the EIS makes clear that the impact is not 100%. However, with the TMC no parallel consideration of actual impacts is given.</p>
O-35-14	<p><i>Reliance on insufficient information to compare each Alternative's potential use of 4(f) properties.</i> Agencies are required to "identify any methodologies used and shall make explicit reference... to the scientific and other sources relied upon for conclusions in the statement." (40 CFR 1502.24.) It has long been established that agencies must articulate "a rational connection between the facts found and the choice made." <i>Motor Vehicle Mfrs. Ass'n of the U.S. v. State Farm Mut. Auto Ins. Co.</i>, 463 U.S. 29, 43 (1983).</p> <p>The flaws resulting from the "net benefit" assumption for TMC aside, the validity of some of the information used to inform the comparison of 4(f) properties is extremely questionable. The information provided for each property is insufficient, in some cases contradictory, and is undermined by inadequate, contradictory information about the properties being compared, and using different metrics.</p>
O-35-15	<p><i>Scope and Intensity of Impacts to 4(f) properties potentially impacted by Orange Alternative are artificially inflated, while no corollary information is provided for the 4(f) property potentially impacted by the Purple and Green Alternatives.</i> The DEIS's comparison of the number of 4(f) properties and their potential use under each alternative is confounding to the reader, precluding meaningful analysis.</p> <p>Table 4-4 provides the percentage of each 4(f) property located within a build corridor for the various alternatives. However, this information seems to contradict information in the text, causing confusion regarding how potential use of each property is being assessed. This results in a significantly problematic apples-to-oranges comparison of the potential use of each property that tells the reader virtually nothing about the actual potential use of each 4(f) property.</p> <p>For example, the potential use of the Manning House in downtown Tucson is unclear. First, the property description is inconsistent from one section to the next; on table 4-4 it is described as 1 acre in size, but on table 4-4 it is described as 3 acres in size. Second, Table 4-4 estimates that 100% of the property is subject to "potential use," but in the text on page 3.7-24 the DEIS</p>

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O-35-14	Section 4(f)	<p>GlobalTopic_1 and GlobalTopic_8</p> <p>Section 4(f) allows for a preliminary Section 4(f) approval to be made when a first-tier, broad-scale EIS is prepared (23 Code of Federal Regulations 774.7(e)(1)). The regulation acknowledges that the detailed information necessary to complete the Section 4(f) process and obtain a final approval may not be available. This is the case in the Tier 1 EIS for the I-11 Corridor project. FHWA and ADOT acknowledge that more design and analysis will be required in a Tier 2 process before a final Section 4(f) approval can be obtained. During Tier 2 studies, a detailed analysis of the Section 4(f) properties will be undertaken and documented. This analysis will examine and compare alternative, project-level alignments in accordance with the regulations of NEPA and Section 4(f), in order to inform decision-making prior to a final NEPA Decision and final Section 4(f) approval.</p>
O-35-15	Section 4(f)	<p>GlobalTopic_1</p> <p>FHWA and ADOT reviewed and revised or clarified the property information in the Draft Preliminary Section 4(f) Evaluation. The document also clarifies that, according to 23 Code of Federal Regulations 774.15(a), a constructive use of a Section 4(f) property cannot occur when land from that property is incorporated into the transportation project, in this case the I-11 Corridor project.</p> <p>FHWA and ADOT quantified numbers of Section 4(f) properties in each 2,000-foot wide corridor in Tier 1 study because the corridors are substantially wider than a project-level alignment width of approximately 400 feet that will be studied in more detail in Tier 2. The Tier 1 methodology focused on assessing the potential for each Section 4(f) property to be avoided by future design (by means of accommodation, shift, or grade-separation). Closer examination and documentation of the potentially impacted activities, features and attributes of each Section 4(f) property (for example, buildings, ballfields, and picnic areas) will be required and undertaken in the Tier 2 Section 4(f) Evaluation. At that time, project-level alignment alternatives will be developed, the potential for those alignments to use Section 4(f) properties will be assessed, and the uses will be compared among the alternative alignments prior to identifying an alternative with the least harm to Section 4(f) properties."</p>

ID	Comment Document
O-35-15	<p>states, "Any ROW expansion east of I-10 would take part of a parking lot associated with the Levi H. Manning House but the house is unlikely to be directly affected." This indicates that the percentage of "potential use" is not the same as the percentage of the property potentially directly impacted, indicating that indirect impacts are part of the "potential use" consideration. Another example of this is Barrio Anita, where the percentage of the property subject to "potential use" is 85 percent. At the same time, the text states that out of 66 buildings identified in the Barrio Anita Historic District NRHP nomination, the Orange Alternative "could require land from four parcels with contributing residences along the west side of Contzen Avenue <u>but not all of those houses might be directly affected</u>" (EIS at 3.7-24). To make matters more confusing, elsewhere the text states, "The Orange Alternative could require... Removal of at least one historic residential structure adjacent to I-10 in Barrio Anita" (page 4-75). Again, the only explanation for the discrepancy between the percentage of potential use and the amount of land potentially directly impacted is that indirect impacts are considered in the percentage of potential use.</p> <p>In contrast, the potential use of the TMC property does not appear to include indirect impacts. Table 4-4 shows that only 15% of the property is subject to potential use, with only the percentage of land directly impacted. However, the percentage of potential use would be far larger if indirect impacts are considered for this property, considering how severely compromised the TMC would be as a wildlife movement corridor if an interstate is routed along its entire western boundary or diagonally, from southeast to northwest, through the parcel. There is no explanation for why the TMC is not given the same consideration as the 4(f) properties it is being compared against.</p> <p>Other discrepancies abound. Page 4-73 provides a list of seven 4(f) properties in downtown Tucson that are subject to potential use by the Orange Alternative, which includes the Barrio Anita Historic District and the David G. Herrera and Ramon Quiroz Park (formerly Oury Park). The analysis uses this number to compare the Orange Alternative's potential impacts to 4(f) properties to those of the Purple and Green Alternatives, where only one property -- the TMC -- is subject to potential use. However, the text makes clear that Quiroz Park is a contributing property to the Barrio Anita Historic District, and the Park is not listed separately on Table 4-2 or Table 4-4. Inadvertently or otherwise, listing Quiroz Park separately only in this context artificially increases the number of properties potentially impacted by the Orange Alternative and skews the comparison with the Purple and Green Alternatives.</p> <p><i>Information provided in Least Harm Analysis is so inadequate it precludes meaningful analysis</i></p> <p><u>Least harm analysis Factor 1: Ability to mitigate adverse impacts on each Section 4(f) property</u> When considering the ability to mitigate adverse impacts to each Section 4(f) property, the DEIS provides a list of strategies to mitigate and minimize impacts to Section 4(f) properties in Downtown Tucson on page 4-76. These include measures such as replacement of land, design modifications, restoration, preservation of impacted historic buildings, and compensation. However, on p. 4-96 the DEIS states, "There is a low ability to mitigate the impacts of the Orange Alternative."</p>
O-35-16	<p><u>Least harm analysis Factor 1: Ability to mitigate adverse impacts on each Section 4(f) property</u> When considering the ability to mitigate adverse impacts to each Section 4(f) property, the DEIS provides a list of strategies to mitigate and minimize impacts to Section 4(f) properties in Downtown Tucson on page 4-76. These include measures such as replacement of land, design modifications, restoration, preservation of impacted historic buildings, and compensation. However, on p. 4-96 the DEIS states, "There is a low ability to mitigate the impacts of the Orange Alternative."</p>

ID	Topic	Response
O-35-16	Section 4(f)	<p>GlobalTopic_1</p> <p>In accordance with 23 CFR 774.3(2)(c), if the determination is made that there is no feasible and prudent avoidance alternative, FHWA may approve only the alternative that causes the least overall harm in light of the preservation purpose of Section 4(f). ADOT will undertake a least overall harm analysis during Tier 2 studies. At that time, more detailed study of each Section 4(f) property and the potential for impacts to such properties will be completed. ADOT will develop and evaluate roadway alignments at a project-level with the goals of avoiding or minimizing impacts on the natural and built environment, including Section 4(f) properties.</p> <p>During Tier 2, ADOT will examine the Preferred Alternative west and east options in detail and will coordinate with the officials with jurisdiction over potentially affected Section 4(f) properties during the studies and development of appropriate mitigation measures. These studies and coordination activities will enable completion of a Final Section 4(f) Evaluation that compares the relative impacts and mitigation effectiveness of the options prior to selection of the option with the least overall harm.</p> <p>The Sonoran Desert National Monument was designated by Presidential Proclamation 7397 for the purpose of protecting objects of the Sonoran desert landscape. The Proclamation recognizes that the property also contains historic sites. This is the primary purpose of the property and the source for FHWA's assessment that Sonoran Desert National Monument is not protected by Section 4(f). As described in FHWA's 2012 Section 4(f) Policy Paper, Question 1A, to be protected by Section 4(f), the property must be publicly owned and accessible to the public. The property must also be formally designated with the primary use being a park, recreation area, wildlife or waterfowl refuge, or historic site. The Proclamation does not identify the property as having the primary purpose of a park, recreation area, wildlife or waterfowl refuge, or historic site, even though the Bureau of Land Management may manage the property to allow such activities and objects. Therefore, the Monument, as a whole, is not protected by Section 4(f).</p> <p>When considering whether Section 4(f) may apply to Tucson Mountain Wildlife Area, FHWA first applied the test of whether the land is under public ownership and is open to the public. FHWA assessed that Tucson Mountain Wildlife Area is a mix of publicly-owned properties that are open to the public and privately-owned properties that are not open to the public. Only the properties that are publicly-owned and open to the public have the potential to be protected by Section 4(f). An example of such a property within the Tucson Mountain Wildlife Area is Saguaro National Park, which is protected by Section 4(f). For these reasons, the Tucson Mountain Wildlife Area, being a grouping of publicly-owned and privately-owned lands, is not protected by Section 4(f).</p> <p>Tier 2 studies will include a detailed assessment of the potential for impacts to NEPA resources and Section 4(f) properties and will examine how project-level alignments could have cumulative effects on multiple resources."</p>

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O-35-17	Transportation	GlobalTopic_1, AC-3, and AC-9
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O-35-16

In addition, on page 4-108 the DEIS states, "After careful consideration, FHWA and ADOT determined Orange Alternative impacts are unmitigable..." Leaving aside the fact that these statements are clearly contradictory to one another, the document provides no meaningful information to support these declaratory statements.

Least harm analysis Factor 2: Relative severity of the remaining harm, after mitigation.

On page 4-96, the DEIS states, "As indicated in Table 4-7 (Summary of Potential Section 4(f) Uses by Build Corridor Alternative) and described for Factor 1, FHWA and ADOT will be required to provide specific mitigation in order to achieve the potential types of uses presented in the table. By achieving the programmatic net benefit finding, the Purple, Green, and Recommended Alternatives would substantially reduce and possibly eliminate remaining harm to the TMC property." This statement explicitly demonstrates skewing of the comparison.

Least harm analysis Factor 3: Relative significance of each Section 4(f) property

The DEIS asserts the following on page 4-97, "FHWA considers each Section 4(f) property to be equally significant in this evaluation; none of the properties has been determined through this evaluation or through coordination with officials with jurisdiction to be of different value." We strongly disagree with this outlandish statement and urge further evaluation of all Section 4(f) properties. This statement asserts that the entire Tucson Mitigation Corridor is equal to the parking lot of the Manning House, which is a ridiculous and erroneous assertion to make.

Least harm analysis Factor 6

Section 4(f) properties are defined in part as "publicly owned land of a public park, recreation area, or wildlife and waterfowl refuge of national, State, or local significance, or land of an historic site of national, State, or local significance (as determined by the federal, state, or local officials having jurisdiction over the park, area, refuge, or site)." The Ironwood Forest National Monument was designated by Presidential Proclamation in June of 2000, under a new protective classification of federal Bureau of Land Management lands. We disagree with the conclusion in the DEIS (Appendix F) that fails to recognize Ironwood Forest National Monument as a Section 4(f) property.

Furthermore, the DEIS fails to consider the magnitude of adverse impacts on multiple properties not protected by Section 4(f). For example, for the Purple and Green Alternatives, this analysis must include the Ironwood Forest National Monument (see above), Tucson Mountain Wildlife Area, and Sonoran Desert National Monument. We believe these properties should be considered as 4(f) properties. However, even though these properties are not considered 4(f) properties, this does not mean there are no adverse impacts to them.

O-35-17

Consideration of other transportation strategies

The DEIS and the choice of the Recommended Alternative route overlooks other less costly options that would encourage the free flow of goods through our region. These include:

- Changes to the management of the existing highway to reduce congestion, including pricing, scheduling, and other programs;

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O-35-17

- Technologies that improve traffic flows;
- Enhancements to our rail system, including light rail and intermodal transportation;
- Other road improvements that will divert traffic from I-10.

During the Scoping phase, we strongly recommended a more thorough analysis and consideration of these other transportation strategies that will also better equip our region to adapt to the growing impacts of climate change. Assessing the cumulative impacts of these options on congestion also needs to be more thoroughly considered in the DEIS. **We reiterate our request for this more thorough analysis in future planning efforts and this analysis be completed and shared with the public prior to designating a Preferred Alternative.**

Additional necessary studies

The following studies must be completed prior to designating a Preferred Alternative, with the results communicated to the community and incorporated into the decision process early on:

- A complete inventory of known and potential historic and archaeological resources that could be directly or indirectly impacted by the Recommended Alternative route. This study should be reviewed and approved by the Tucson Historic Preservation Foundation, the Tucson-Pima County Historical Commission, the City of Tucson Historic Preservation Office, the Pima County Cultural Resources and Historic Preservation Division, and the Arizona State Historic Preservation Office.
- Environmental quality impacts: air quality, noise, light pollution, viewshed, wildlife, vegetation, watershed, and the health and biological integrity of the Brawley/Los Robles wash system and Santa Cruz River.
- Social and economic equity impacts.

O-35-18

When studies are completed, there needs to be a demonstrated respect for the natural, historic, and archaeological resources and avoidance of all these resources in any Recommended Alternative route. Furthermore, we strongly encourage ADOT and FHWA to refer to the "I-11 Super Corridor Study" final document, which was submitted to ADOT in 2016, to draw inspiration on a comprehensive design. The Sustainable Cities Lab, hosted at the University of Arizona (UA) College of Architecture, Planning and Landscape Architecture, completed this transdisciplinary study on the I-11 corridor along with Arizona State University and the University of Nevada, Las Vegas. UA's study area focused on opportunities from Marana to south of downtown Tucson. Their outcomes incorporate many of our outlined points, including the addition of light and heavy rail, walking, cycling, new technology for controlling traffic as well as incorporating alternative forms of energy production and transportation. Using such studies and designs would help us reduce impacts in Tucson's downtown and surrounding areas should co-location be further considered.

Other factors that must be more thoroughly analyzed for all corridor alternatives include how continued climate change, which is a reasonably foreseeable circumstance, will impact Arizona's water resources and projected population growth; public health implications,

O-35-18	NEPA Process	GlobalTopic_4, GlobalTopic_1, AC-3 and GlobalTopic_8
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ID	Comment Document
O-35-18	<p>including increased air pollution and the proliferation of valley fever; and long-term impacts on local and regional land-use plans.</p> <p>The Recommended Alternative route through Avra Valley would facilitate commercial and residential development in this area. Such exurban development would result in even more habitat fragmentation, cause local governments to incur large financial responsibilities for new infrastructure costs and maintenance, and force major changes to existing local and regional land-use and zoning designations. Existing land use plans have already identified areas most appropriate for growth as mandated by state law and any new transportation corridors should be appropriately sited within those existing identified growth areas.</p> <p>Considering the identified Recommended Alternative route in the DEIS, we argue that either the No Build alternative or improvements to existing transportation corridors and reducing congestion on existing highways in order to accommodate future traffic will best avoid and minimize environmental and larger community impacts. Because of this, we stand in strong opposition to the Recommended Alternative route.</p> <p>Local government opposition In 2007, the elected Pima County Board of Supervisors passed Resolution No. 2007-343 (attached) opposing “the construction of any new highways in or around the County that have the stated purpose of bypassing the existing Interstate 10 as it is believed that the environmental, historic, archaeological, and urban form impacts could not be adequately mitigated.” Additionally, the Board called for the expansion of “capacity along Interstate 10 for multiple modes of travel including, but not limited to, freight, passenger cars, transit, intercity passenger rail, and bicycle, and for beautification of the existing corridor.”</p> <p>Additionally, in April 2019 Pima County Board of Supervisors’ Chair Richard Elias and Supervisor Sharon Bronson (in whose Districts most of the proposed highway is located) released a statement stating, in part, “The Pima County Board of Supervisors adopted Resolution 2007-343 on December 18, 2007, setting forth its opposition to construction of an interstate highway through ‘invaluable Sonoran Desert areas.’ That remains the official position of Pima County government...A new freeway through any pristine Sonoran Desert area, and especially through Avra Valley, still is a very bad idea and the Pima County Board of Supervisors remains officially opposed to it” (attached). We strongly concur with Pima County’s elected officials and their resolution. Rather than investigating the potential for new transportation corridors in Pima County, we encourage all transportation planners to work to develop multi-modal transportation options within existing transportation corridors.</p> <p>On June 18, 2019, the City of Tucson Mayor and Council adopted a resolution explicitly opposing the Recommended Alternative route (attached). The resolution states, in part, “The Mayor and Council strongly oppose the currently proposed alignment of I-11, that would have the effect of bypassing the existing Interstate 10. The Mayor and Council support the expansion and reconfiguration of the existing I-10 and I-19 corridor as the only acceptable alternative for the proposed I-11 highway; and that any alternative route that would result in the construction</p>
O-35-19	<p>Additionally, in April 2019 Pima County Board of Supervisors’ Chair Richard Elias and Supervisor Sharon Bronson (in whose Districts most of the proposed highway is located) released a statement stating, in part, “The Pima County Board of Supervisors adopted Resolution 2007-343 on December 18, 2007, setting forth its opposition to construction of an interstate highway through ‘invaluable Sonoran Desert areas.’ That remains the official position of Pima County government...A new freeway through any pristine Sonoran Desert area, and especially through Avra Valley, still is a very bad idea and the Pima County Board of Supervisors remains officially opposed to it” (attached). We strongly concur with Pima County’s elected officials and their resolution. Rather than investigating the potential for new transportation corridors in Pima County, we encourage all transportation planners to work to develop multi-modal transportation options within existing transportation corridors.</p> <p>On June 18, 2019, the City of Tucson Mayor and Council adopted a resolution explicitly opposing the Recommended Alternative route (attached). The resolution states, in part, “The Mayor and Council strongly oppose the currently proposed alignment of I-11, that would have the effect of bypassing the existing Interstate 10. The Mayor and Council support the expansion and reconfiguration of the existing I-10 and I-19 corridor as the only acceptable alternative for the proposed I-11 highway; and that any alternative route that would result in the construction</p>

ID	Topic	Response
O-35-19	Recommended Alternative	GlobalTopic_4 and GlobalTopic_1

ID	Comment Document
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ID	Topic	Response
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O-35-19

of a new interstate highway in or through Avra Valley would produce enormous adverse impacts to economic, environmental, historic, cultural and archaeological resources that could not be adequately mitigated and that are contrary to the interstate design standards and criteria that must be applied to the project.”

On May 18, 2019, Arizona District 3 Congressman Raúl Grijalva submitted comments on the DEIS voicing his opposition to the Recommended Alternative route. We have attached the Congressman’s letter as well.

Thank you for the opportunity to provide comments on the *Interstate 11 Tier 1 Draft Environmental Impact Statement, Nogales to Wickenburg*. **Given the far-reaching and devastating impacts that the Recommended Alternative route would have on the incredible portfolio of public conservation lands in and adjacent to Avra Valley, we express our strong opposition to the Recommended Alternative route and feel that should additional capacity be warranted, that reconfiguration of existing highways is the only acceptable Alternative. This DEIS is replete with inadequate analyses and is, in and of itself, a fatal flaw.** We look forward to your analysis and assessment and to commenting further in future phases of the process. If we can be of any assistance, please do not hesitate to contact us.

Sincerely,

Carolyn Campbell
Executive Director, Coalition for Sonoran Desert Protection

Jodi Netzer, Director
Tucson Entrepreneurs

Sandy Bahr, Chapter Director
Sierra Club - Grand Canyon Chapter

Robin Clark *for*
Avra Valley Coalition

Meg Weesner, Chair
Sierra Club - Rincon Group

Tom Hannagan, President
Friends of Ironwood Forest

Emily Yetman, Executive Director
Living Streets Alliance

Louise Misztal, Executive Director
Sky Island Alliance

Kevin Gaither-Banchoff, Development
Director

Barbara Rose, Project Coordinator
Safford Peak Watershed Education Team

WildEarth Guardians

Diana Hadley, Co-President
Northern Jaguar Project

Peter Chesson, President
Tucson Mountains Association

Demion Clinco, President
Tucson Historic Preservation Foundation

Gayle Hartmann, President
Save the Scenic Santa Ritas

ID **Comment Document**

ATTACHMENTS

Robert Villa, President Tucson Herpetological Society	Randy Serraglio, Southwest Conservation Advocate Center for Biological Diversity
Terry Majewski, Chair Tucson-Pima Historical Commission	Myles Traphagen, Borderlands Project Coordinator Wildlands Network
Ivy Schwartz, President Community Water Coalition of Southern Arizona	Gary Kordosky, President Gates Pass Area Neighborhood Association
Jonathan Lutz, Executive Director Tucson Audubon Society	Della Grove, President Citizens for Picture Rocks
Nancy Williams, President People for Land and Neighborhoods	Jessica Moreno, President Arizona Chapter of The Wildlife Society
Fred Stula, Executive Director Friends of Saguaro National Park	Mike Quigley, Arizona State Director The Wilderness Society
Pearl Mast and Anna Lands, Co-Chairs Conservation Committee Cascabel Conservation Association	Robert Peters, Southwest Representative Defenders of Wildlife

Attachments: April 2019 Memo from Pima County Supervisors Richard Elías and Sharon Bronson
Pima County Resolution No. 2007-343
City of Tucson Resolution No. 23051
May 2019 Letter from Rep. Raúl Grijalva (D-AZ)

ID Comment Document

April 2019 Memo from Pima County Supervisors Richard Elias and Sharon Bronson



To Whom it May Concern:

The Pima County Board of Supervisors adopted Resolution No. 2007-343 on December 18, 2007, setting forth its opposition to construction of an interstate highway through "invaluable Sonoran Desert areas." That remains the official position of Pima County government.

At the time, the proposal under consideration was for an Interstate 10 Bypass Freeway, but it was along the same suggested routes as the currently proposed Interstate 11. A "favored" route then, as now, was through Avra Valley.

A freeway through the Avra Valley or other parts of the delicate Sonoran Desert is not compatible with the county's landmark Sonoran Desert Conservation Plan or with its Sustainability Plan to combat climate change in line with the 2015 Paris Agreement.

A freeway would destroy sensitive habitat for many of the 44 unique species of concern that the Conservation Plan protects. It would sever vital wildlife corridors between critical habitat areas of some of the larger species such as the Desert Bighorn.

The Sustainability Plan aims to steer the county government operations away from fossil fuel use and dependency, and a new freeway would promote increased fossil-fuel use, to the detriment of our air quality as well as to climate change.

A freeway through Avra Valley would impact severely and negatively such jewels and tourist areas as Tucson Mountain Park, Saguaro National Park, Ironwood National Monument, and the Arizona-Sonora Desert Museum. It would diminish vastly the quality of life of thousands of Avra Valley residents.

The cost of buying land for and building an entirely new freeway would be tremendous, when we do not have enough funds to maintain properly our existing roads and highways. It would cost much less to improve existing railroad corridors for cleaner passenger rail service and increased freight traffic.

An Interstate 11 would divert traffic away from existing businesses that depend on Interstate 10 and Interstate 19 traffic visibility for their survival.

A new freeway through any pristine Sonoran Desert area, and especially through Avra Valley, still is a very bad idea and the Pima County Board of Supervisors remains officially opposed to it.

Sincerely,

 Richard Elias, Chairman
 Pima County Board of Supervisors

Sharon Bronson, District Three Supervisor
 Pima County Board of Supervisors

ID Comment Document

RESOLUTION NO. 2007- 343

A RESOLUTION OF THE PIMA COUNTY BOARD OF SUPERVISORS IN OPPOSITION TO CONSTRUCTION OF AN INTERSTATE HIGHWAY LINK THAT BYPASSES TUCSON AND TRAVERSES PRISTINE AND INVALUABLE SONORAN DESERT AREAS

WHEREAS, Pima County's landmark Sonoran Desert Conservation Plan identifies 55 rare local species of concern, whose areas of habitat and corridors between habitat areas already are under threat from development; and

WHEREAS, Pima County has established a Sustainability Program that recognizes the detriment of petroleum-fueled car and truck travel to this effort because of their greenhouse-gas and pollutant emissions, and therefore calls for the County to shift its fleet to use alternative fuels; and

WHEREAS, since 1974 Pima County has bought more than 45,000 acres of land and assumed grazing leases on 86,000 acres for open-space and wildlife habitat preservation, and to mitigate impacts from development; and

WHEREAS, Pima County updated its Riparian Mitigation Ordinance in 2005 to avoid and minimize impacts to riparian vegetation along local washes; and

WHEREAS, the Arizona Department of Transportation (ADOT) has undertaken the Interstate 10 Phoenix-Tucson Bypass Study to look at alternative routes for new controlled access highways that Interstate 10 cars and trucks could use to bypass the Tucson and Phoenix metropolitan areas; and

WHEREAS, the study has advanced to the point of identifying two alternative routes which impact Pima County; and

WHEREAS, each of the alternatives would degrade the Sonoran Desert, sever wildlife corridors identified by the ADOT-sponsored "Arizona Wildlife Linkages Assessment," impede washes, open new areas to intense residential and commercial development far from existing urban centers, and thus encourage more car and truck travel at time when global warming and air pollution are growing concerns; and

WHEREAS, one of the alternatives would traverse the San Pedro River Valley impacting both Cochise County and Pima County; and

WHEREAS, the San Pedro River and its valley constitute one of the most biologically diverse and important ecosystems in North America, which also serves as vitally important flyway for hundreds of unique migratory bird species and is a sensitive aquatic and terrestrial wildlife corridor; and

ID **Comment Document**

WHEREAS, there are more than 500 known archaeological sites in the San Pedro River Valley, some dating back as much as 12,000 years and some considered sacred to Native American people; and

WHEREAS, a second identified route runs through the Avra Valley, negatively impacting Tucson Mountain Park, Saguaro National Park, Ironwood National Monument, Bureau of Reclamation's Central Arizona Project Canal mitigation area, and important elements of the County's Sonoran Desert Conservation Plan by slicing through sensitive areas, severing linkages between important habitat areas, and disturbing an unknown number of archeological sites; and

WHEREAS, the cost of building a new controlled-access highway would be enormous, requiring the acquisition of thousands of acres of new rights of way, expenditures on high and rapidly increasing costs of concrete and asphalt, putting a tremendous burden on taxpayers and future highway users; and

WHEREAS, the production of the millions of tons of concrete and asphalt for this massive construction project would cause significant air pollution and greenhouse gas emissions, as would the operation of heavy machinery in the construction process; and

WHEREAS, a new controlled-access highway near or through Pima County on any route, would promote urban sprawl, causing local governments to incur large financial responsibilities for new infrastructure costs and force major changes to existing county land-use and zoning designations; and

WHEREAS, a new controlled-access highway bypass would divert cars and trucks away from existing businesses that are dependent upon commerce generated from traffic on existing highways; and

WHEREAS, the state of Arizona could reduce highway traffic congestion, reduce the cost of highway maintenance, and save on the costs of rights of way purchases and concrete and asphalt production and installation – while reducing air pollution and greenhouse gas emissions – by instead expanding capacity and developing multi-modal transportation facilities in existing transportation corridors to sustainably accommodate projected increases in freight while providing for much-needed passenger rail traffic.

NOW, THEREFORE, BE IT RESOLVED that the Pima County Board of Supervisors:

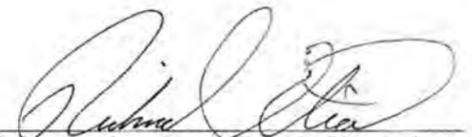
1. Opposes the construction of any new highways in or around the County that have the stated purpose of bypassing the existing Interstate 10 as it is believed that the environmental, historic, archeological, and urban form impacts could not be adequately mitigated.

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2. Supports the continuation of studies relating to this bypass such that the full costs of mitigation measures can be brought forth.
3. Calls upon the office of Governor Janet Napolitano to direct ADOT to undertake studies related to expanding capacity along Interstate 10 for multiple modes of travel including, but not limited to, freight, passenger cars, transit, intercity passenger rail, and bicycle, and for beautification of the existing corridor.

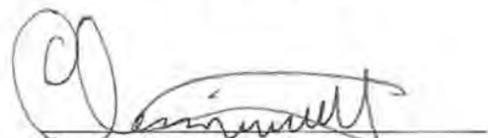
Passed by the Board of Supervisors of Pima County, this 18th day of December, 2007.


Chairman, Pima County Board of Supervisors

ATTEST:

APPROVED AS TO FORM:


Clerk of the Board


Deputy County Attorney

270

ADOPTED BY THE
MAYOR AND COUNCIL

June 18, 2019

RESOLUTION NO. 23051

RELATING TO PUBLIC HEALTH AND SAFETY: DECLARING MAYOR AND COUNCIL'S OPPOSITION TO CONSTRUCTION OF A NEW INTERSTATE HIGHWAY THAT BYPASSES THE CITY OF TUCSON AND TRAVERSES PRISTINE AND INVALUABLE SONORAN DESERT AREAS; AND DECLARING AN EMERGENCY.

WHEREAS, the City of Tucson (Tucson) works to advance goals of sustainability, equity, economic growth and vibrant, livable neighborhoods; and

WHEREAS, in November 2013 Tucson voters adopted Plan Tucson, the City of Tucson General Plan & Sustainability Plan; and

WHEREAS, Tucson has established a Sustainability Program that recognizes the detriment of petroleum-fueled car and truck travel because of their greenhouse-gas and pollutant emissions; and

WHEREAS, Plan Tucson seeks to create, preserve, and manage biologically rich, connected open space; wildlife and plant habitat; and wildlife corridors, including natural washes and pockets of native vegetation, while working to eradicate invasive species; and

WHEREAS, an interstate highway in the Avra Valley would degrade the Sonoran Desert, sever wildlife corridors, impede washes and flood prone areas, open new areas to intense residential and commercial development

far from existing urban centers, and encourage more car and truck travel at time when climate change and air pollution are growing concerns; and

WHEREAS, Tucson strives to protect night skies from light; and

WHEREAS, Tucson believes in an urban form that conserves natural resources, improves and builds on existing public infrastructure and facilities, and provides an interconnected multi-modal transportation system to enhance the mobility of people and goods; and

WHEREAS, Tucson seeks to protect its CAP water recharge facilities in Avra Valley, groundwater, surface water, and stormwater from contamination; and

WHEREAS, in April 2012 the Mayor and Council passed a resolution to adopt the Downtown Gateway Redevelopment Area and central business district; and

WHEREAS, Tucson seeks to capitalize on Tucson's strategic location by maintaining and enhancing Tucson as an international port and center for commerce and logistics; and

WHEREAS, Tucson supports the expansion of passenger and freight multi-modal transportation services to better connect Tucson to regional and international markets and destinations; and

WHEREAS, the Interstate 11 Draft Tier 1 Environmental Impact Statement Recommended Alternative route would run through the Avra Valley, negatively impacting Tucson Mountain Park, Saguaro National Park - West, Ironwood Forest National Monument, Bureau of Reclamation's Central Arizona

ID Comment Document

Project mitigation parcel, and severing linkages between important habitat areas and disturbing an unknown number of archeological sites; and

WHEREAS, the cost of building a new highway in Avra Valley would be enormous, would promote urban sprawl, and would divert cars and trucks away from existing businesses in Tucson; and

WHEREAS the state of Arizona could reduce highway traffic congestion, reduce the cost of highway maintenance, and save on the costs of rights of way purchases and concrete and asphalt production and installation - while reducing air pollution and greenhouse gas emissions – by instead investing in I-19 & I-10 and developing multi-modal transportation facilities in existing transportation corridors to sustainably accommodate projected increases in freight while providing for much-needed passenger rail traffic.

NOW, THEREFORE, BE IT RESOLVED BY THE MAYOR AND COUNCIL OF THE CITY OF TUCSON, ARIZONA, AS FOLLOWS:

SECTION 1. The Mayor and Council strongly oppose the currently proposed alignment of I-11, that would have the effect of bypassing the existing Interstate 10. The Mayor and Council support the expansion and reconfiguration of the existing I-10 and I-19 corridor as the only acceptable alternative for the proposed I-11 highway; and that any alternative route that would result in the construction of a new interstate highway in or through Avra Valley would produce enormous adverse impacts to economic, environmental, historic, cultural and archaeological resources that could not be adequately

mitigated and that are contrary to the interstate design standards and criteria that must be applied to this project.

SECTION 2. WHEREAS, it is necessary for the preservation of the peace, health and safety of the City of Tucson that this Resolution become immediately effective, an emergency is hereby declared to exist and this Resolution shall be effective immediately upon its passage and adoption.

PASSED, ADOPTED AND APPROVED by the Mayor and Council of the City of Tucson, Arizona, __June 18, 2019__.

MAYOR

ATTEST:

CITY CLERK

APPROVED AS TO FORM:

MR/dg

CITY ATTORNEY

MR/dg
6/13/19

REVIEWED BY:

CITY MANAGER

ID Comment Document

RAÚL M. GRIJALVA
3RD DISTRICT, ARIZONA

COMMITTEE ON NATURAL RESOURCES
CHAIRMAN
COMMITTEE ON EDUCATION AND LABOR
HIGHER EDUCATION AND WORKFORCE INVESTMENT
SUBCOMMITTEE
CIVIL RIGHTS AND HUMAN SERVICES SUBCOMMITTEE
CONGRESSIONAL PROGRESSIVE CAUCUS
CHAIR EMERITUS

Congress of the United States
House of Representatives
Washington, DC 20515-0307

WEBSITE: <http://grijalva.house.gov/>

May 8, 2019

I-11 Tier 1 EIS Study Team c/o ADOT Communications
1655 W. Jackson Street Mail Drop 126F
Phoenix, AZ 85007

Also emailed to: I-11ADOTStudy@hdrinc.com

Re: the I-11 Draft Tier 1 Environmental Impact Statement and Preliminary Section 4(f) Evaluation (Draft Tier 1 EIS) Nogales to Wickenburg

Dear Mr. Van Echo,

I would like to take this opportunity to provide input during the public comment period on the Draft Tier 1 EIS referenced above.

I am concerned that the current comment period is too short for a comprehensive review of this extremely large document (762 pages plus appendices). I request that the comment period be extended for a total of 120 days—which is common for projects of this magnitude and controversy—making the revised due date for comments August 3, 2019.

I support efforts to physically connect Arizona and Nevada via transportation corridors to facilitate Canadian and Mexican trade routes. The City of Tucson and the metro region of Pima County would benefit most by enhancing existing infrastructure that already provides the connection: Interstate 10 and 19, or option “A” and “B” that have been included in your route studies.

I am **very concerned** that a hybrid option of routes going through Altar and Avra Valley has instead been chosen for the preferred alternative in the Draft Tier 1 EIS. This route would necessitate building new interstate. This route would negatively impact rural communities in Avra Valley, Saguaro National Park, Tucson Mountain Park, Ironwood Forest National Monument, and other protected open spaces and wildlife corridors. I pointed this out during the scoping process in a June 1, 2017, letter to project manager Jan Van Echo. For the record I would like to repeat my concerns:

This proposed route of the Interstate would bring in new development, roads, traffic, and have a negative impact on dark skies, wilderness values, and quality of life for residents of that community. Even a limited access roadway would still open this mainly undeveloped area to massive sprawl. Residents of my district affected by this option have called my office expressing these same concerns. Pima County voters have consistently opposed opening up the far western areas of Pima County to development via this transportation corridor. At some point, the Federal Highway Administration and the Arizona Department of Transportation must be responsive and support alternatives that provide economic opportunity in the existing metro region and not continue to promote routes that local voters have overwhelmingly opposed.

Frankly, it troubles me that after two scoping periods and a stakeholder engagement process that resulted in widespread opposition to proceeding with any route through Avra Valley – and with serious concerns expressed

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FACEBOOK: [Facebook.com/Rep.Grijalva](https://www.facebook.com/Rep.Grijalva)
TWITTER: [Twitter.com/RepRaulGrijalva](https://twitter.com/RepRaulGrijalva)
INSTAGRAM: [Instagram.com/RepRaulGrijalva](https://www.instagram.com/RepRaulGrijalva)

all along by cooperating land and wildlife managing agencies – your study has determined that the much more costly alternative with greater negative impacts and fewer benefits for Pima County is the preferred alternative.

One explanation for this conclusion is that a Tier 1 analysis is not enough for a federal process to come up with the better route alternative. The tiering of the required environmental compliance means that the decision is not informed by the best information and that vague promises of future mitigation is enough to allow the incredible decision to bisect an important wildlife mitigation area with a major freeway. This calls into question the Department of Transportation’s unusual practice of coming to a decision without the full environmental compliance that most other federal projects regularly require.

A proposed MOU giving the state environmental compliance responsibilities for federal highway projects in Arizona, which would include the Tier 2 study, further demonstrates the inappropriate fragmentation of planning and compliance this project will receive, especially compared to projects with this sort of impact on protected lands that our community would normally expect.

Another issue of concern is the regularity with which this route keeps re-surfacing. Voters overwhelmingly voted against a ½ cent sales tax that would have funded a similar project back in the mid-1980s. The Picture Rocks community along with many other Pima County residents and organizations have and continue to vocally oppose it, yet this route keeps being promoted as the preferred option.

Very little is being done to address alternatives to continuous freeway expansion, such as facilitating the expansion and use of intermodal shipping yards, facilitating the creation of public rail transportation lines as alternatives to continuously promoting freeway development—especially in pristine habitat corridor areas. I consistently remain opposed to any highway plan that opens up the Avra valley to widespread environmental destruction.

The possible fast tracking of this project, despite information typically disseminated by the project’s managers at public meetings that there is not current funding available, is concerning. While that may be currently true, this project is in conjunction with the Federal Highway Administration, I-11 and Intermountain West Corridor Study (IWCS) completed in 2014. With talk in Congress about developing an infrastructure spending package, the state appears to be attempting to remove all barriers to fast tracking this project once, and if, funding is available. If Congress is able to pass an infrastructure package, the voters will have no say, as planning will be completed, and routes will have been previously selected.

If the project’s purpose is to provide a high-priority north to south transportation corridor to connect to major metropolitan areas and markets with Mexico and Canada, then I believe that the best option is using Interstate 10 and 19, which already includes metropolitan Tucson and protects the environmentally sensitive area west of Tucson.

Thank you for your time and the opportunity to provide input.

Sincerely,

Raúl M. Grijalva,
Member of Congress, (AZ-03)

Cc: Jan Van Echo, PE, ADOT I-11 Study Manager

ID	Comment Document
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To Whom It May Concern: 7 July 2019

I have submitted very detailed comments on behalf of my organization, the Coalition for Sonoran Desert Protection (in conjunction with 27 other organizations). And I want to personally comment that I 100% agree with everything in that letter (dated and submitted on July 4, 2019).

However, the reason I am writing you a hand-written letter is because I tried to send an email to you today to your official email address, and it was returned as undeliverable. This is appalling and unacceptable. One day before the deadline? Really?? And so, I am handwriting this letter.

Sincerely, Carolyn Campbell

O-67-1

ID	Topic	Response
O-67-1	General	The I-11 Team received the Coalition for Sonoran Desert Protection letter.

ID	Comment Document
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ID	Topic	Response
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0-67-1

1216 N. 3rd Ave
Tucson, AZ 85705

ID	Comment Document
Marana Public Hearing, May 11, 2019	

ID	Topic	Response
O-23-1	Water Resources	GlobalTopic_1 and WR-2

O-23-1 24 MS. CHRISTINA MCVIE: My name is Christina
 25 McVie, vice-president of the Community Water Coalition of

ID	Comment Document
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ID	Topic	Response
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1 Southern Arizona. The Tucson Active Management Area
 2 contains two parallel sub basins; the Upper Santa Cruz
 3 Valley to the east and the Avra Valley to the west. In
 4 the east, southwest Tucson has been contaminated with
 5 trichloroethylene since at least 1952.

6 After the EPA confirmed local testing in
 7 1981, the Tucson International Airport area was declared a
 8 Superfund site in 1983. In 1984, TCE concentrations were
 9 as high as 3,100 micrograms per liter.

10 As an RN, I lived in the area and cared for
 11 many of the TCE cancer victims. Hundreds of people died.
 12 A decade later, in 1994, the TARP TCE remediation and
 13 treatment facility began operating. Yet in 2000, the
 14 Arizona Department of Health Services concluded that a
 15 future potential public health hazard may exist.

16 In 2002, 1,4-dioxane, another carcinogen,
 17 was detected at Tucson's TARP facility. Twelve years
 18 later, in 2014, the dioxane AOP treatment facility began
 19 to operate in tandem with TARP.

20 When Tucson tested well samples from 2017
 21 and 2018, perfluorinated compounds, or forever chemicals,
 22 were detected at unsafe levels that ranged from 97 to
 23 3,320 parts per trillion. It is unknown how long
 24 consumers have been exposed to these toxins. Marana has
 25 joined Tucson in suing 3M and four other companies after

O-23-1

ID	Comment Document
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ID	Topic	Response
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O-23-1

1 3M admitted knowing about the adverse effects of these
 2 chemicals for decades.
 3 Water managers initially addressed these
 4 issues, in part, by diluting contaminants with the clean
 5 water from the western half of our AMA, where water flows
 6 northward and levels are rising due to agricultural
 7 retirement and groundwater recharge activities. Treating
 8 these toxins will take millions of dollars and decades of
 9 implementation.
 10 Clean water is a finite resource. Arizona
 11 has been in a state-declared drought emergency since 1996,
 12 the same year water recharge began in the Avra Valley.
 13 Your preferred route is adjacent to portions
 14 of the CAP canal and various water recharge and recovery
 15 facilities, where trucks carrying dangerous gases,
 16 dangerous chemicals, petroleum products and other toxins
 17 will have accidents and contaminate the aquifer. Will the
 18 Federal Highway Administration and ADOT be responsible and
 19 pay for these damages and remediation in perpetuity?
 20 Water is life, yet your preferred route
 21 risks the water quality and supply of a major metropolitan
 22 region, including water banked by Metro Water, Marana, Oro
 23 Valley, Tucson and Phoenix. Placing I-11 in the Altar and
 24 Avra Valleys is a fatal flaw. It should be co-located
 25 with I-10.

ID	Comment Document
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ID	Topic	Response
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0-23-1	1 I will leave a copy of this with the court 2 reporter, which includes references accessed yesterday. 3 Thank you.
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ID	Comment Document
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ID	Topic	Response
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O-44-1	Orange Alternative, Biologic Resources	GlobalTopic_4, BR-4 and GlobalTopic_1
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DESERT TORTOISE COUNCIL
 4654 East Avenue S #257B
 Palmdale, California 93552
www.deserttortoise.org
eac@deserttortoise.org

6 July 2019

I-11 Tier 1 EIS Study Team c/o ADOT Communications
 1655 W. Jackson Street
 Mail Drop 126F
 Phoenix, AZ 85007

Via email only to: I-11ADOTStudy@hdrinc.com

Subject: Interstate 11 Tier 1 Draft Environmental Impact Statement (DEIS), Nogales to Wickenburg, Arizona.

The Desert Tortoise Council (Council) is a non-profit organization comprised of hundreds of professionals and laypersons who share a common concern for wild desert tortoises and a commitment to advancing the public's understanding of desert tortoise species. Established in 1975 to promote conservation of tortoises in the deserts of the southwestern United States and Mexico, the Council routinely provides information and other forms of assistance to individuals, organizations, and regulatory agencies on matters potentially affecting desert tortoises within their geographic ranges.

O-44-1

We appreciate this opportunity to provide comments on the above-referenced project. Given the location of the proposed project in habitats likely occupied by Morafka's desert tortoise (*Gopherus morafki*) (synonymous with "Sonoran desert tortoise"), our comments pertain to our concern regarding the proposal to place the planned I-11 freeway through the Avra Valley, west of Tucson, Arizona, instead of using the alternative of co-locating it along the already developed route of the I-10 freeway or using other methods to achieve the transportation goals desired.

For the reasons given herein, the Council formally opposes the development of the freeway through Avra Valley and recommends instead that the freeway coincide with the I-10 corridor.

Letters by the Tucson Herpetological Society and the Coalition for Sonoran Desert Protection, which the Council fully endorses, have well documented the many serious concerns, so our comments will be brief.

ID	Comment Document
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ID	Topic	Response
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O-44-1

Desert tortoises are known to exist in the area of the proposed Avra Valley freeway and their movements, especially inter-population migrations and seasonal movements for feeding, will be impeded by the proposed new freeway. There will also be direct loss of viable habitat depending on the precise siting of the project.

We see from the DEIS that the planning team acknowledges that the Avra Valley alternative will cause far greater threat to populations of native species, including the desert tortoise, and will result in far more habitat degradation and most especially fragmentation of existing habitat than the alternative of co-location along the route of the current I-10 corridor. Although mitigation by constructing freeway crossings is proposed, our opinion is that no amount of mitigation can fully counter the effects of a freeway through habitat lands, most especially those already committed as mitigation for the Central Arizona Project, on habitat connectivity.

We appreciate this opportunity to provide input and ask that the Desert Tortoise Council be identified as an Affected Interest for this project, and that any subsequent environmental documentation for this particular project is provided to us at the contact information listed above.

Regards,



Edward L. LaRue, Jr., M.S.
Desert Tortoise Council, Ecosystems Advisory Committee, Chairperson

ID	Comment Document
	Tucson Public Hearing, May 8, 2019

ID	Topic	Response
I-1325-1	General	GlobalTopic_4 and WR-1
I-1325-2	Biologic Resources	GlobalTopic_1 and BR-2

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BILL THORNTON:

My name is Bill Thornton. And I'm with vice president of the Friends of Ironwood Forest. We are a friends group that was formed by the Conservation Lands Foundation to work for the preservation and conservation of the cultural and natural resources of Ironwood Forest National Monument.

This Avra Valley alignment passes very close to both the Ironwood Forest, the eastern -- one of the eastern boundaries and also very close to the western boundary of Saguaro National Park.

Other speakers are probably going to talk a lot about what it's going to do to destroy any kind of habitat between the two areas and insurmountable barrier that we've been promised that there will be wildlife corridors.

And the only thing I can say to that is when we voted for wildlife corridors on Highway 77 north of Tucson, some state legislatures tried to remove the funding for wildlife corridors before the road was even built.

But my main message today in this entire thing, this entire corridor, is based on the assumption that it's going to be business as usual here in the

I-1325-1

I-1325-2

I-1325-1

ID	Comment Document
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ID	Topic	Response
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1 future.

2 We're going to go on the developing. We're

3 going to have more people, more roads, and more of

4 everything.

5 Well, besides a reality check, it's all but

6 guaranteed within the next couple of years we're going

7 to get our first tier reduction and see if our water

8 delivers.

9 And we have don't have the water here to

10 support the population, let along down into the future.

11 And this growth will stimulate a lot more growth and

12 development along the entire corridor.

13 For those of you who read the newspaper,

14 within the last couple weeks, you may have noticed a

15 headline that states, "Not cool." Tucson is the third

16 fastest warming city in the U.S.

17 Now, the reason for this is all the top

18 places, the top four spots, were all cities in the

19 desert southwest that are very rapidly growing. And

20 the heat effect, we're paving more and more land, and

21 we're holding more heat in at night. The temperatures

22 continue to rise at a faster rate than they would in

23 the underlying warming trend.

24 So is that a list we really want to be on? Do

25 we want to be Number 3 in the fastest warming category

I-1325-1

ID	Comment Document
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ID	Topic	Response
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Page 11

I-1325-1

1 in the nation? I don't think so. I don't think that
 2 would be a talking point for the chamber of commerce
 3 when they're trying to bring more business to Tucson.
 4 So I guess I'll wrap my thought up with that.
 5 It's an unrealistic project to begin with. Our water
 6 supply is running out, and all we're going to do here
 7 is make the heat more intense and make this place more
 8 unlivable.
 9 So thank you.

ID	Comment Document
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ID	Topic	Response
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July 1, 2019

Proposed Interstate 11

O-32-1

Friends of Robles Ranch opposes the Recommended Alternative Route described in the Tier1 DEIS for Interstate 11 that proposes cutting through the rural Altar and Avra Valleys. We support the colocation of I -11 in the Tucson area with the already existing infrastructure of I – 10 (Orange Route Alternative).

Friends of Robles Ranch is a 501 c 3 organization of citizens of the Three Points/Robles Junction area working to preserve the Historic Robles Ranch Community Center, to make Three Points a place to be used and enjoyed by the community and to assist families in the Robles Junction area and encourage our citizens to become part of a more unified community.

Three Points/Robles Junction is at the head of the Altar Valley and the base of the Avra Valley. Within it lies a key piece of the voter-approved Pima County Sonoran Desert Protection Plan with 20,000 acres of Conservation Land System. It is one of the last undeveloped valleys in Southern Arizona. It is also the home of Buenos Aires National Wildlife Refuge and Kitt Peak National Observatory, which rely on dark skies. Countless wildlife species also call these unfragmented landscapes home.

The proposed location of the Recommended Alternative Route described in the Tier 1 DEIS for I – 11 through the undeveloped landscape of the Altar and Avra Valley which would bring **nothing** to this community but pollution, noise, air and light pollution.

As described in one brochure “The proposed I – 11 Corridor will be much more than an ordinary interstate highway. It will include not just a minimum four-lane highway but also multiple rail lines and fiber optics installations. In contrast to the typical interstate highway width of two or three hundred feet, the proposed I – 11 right-of-way would be 800 to 2,000 feet wide. The anticipated preferred alternative is “expected to be 2,000 feet wide.” In other words, that decision has already been made. This is significant because the Avra Valley is only about 10 miles wide in some places.

O-32-1	Avra Valley	GlobalTopic_1,GlobalTopic_4, and LU-1
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ID	Comment Document
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O-32-2

And finally, this is not United States commerce. This traffic, both highway and rail, is from Mexico slated for Canada or at least Phoenix and beyond. If there are shoppers using I – 11 they will be going to Phoenix bypassing Tucson to spend their money. So why would we support something which walks all over us and brings us nothing?

The Altar and Avra Valleys are no place for an I – 11 when the I – 10 corridor already exists and development can be wisely planned to collocate within an already established transportation corridor.

ID	Topic	Response
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O-32-2	Transportation	GlobalTopic_1 and GlobalTopic_4
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ID	Comment Document
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Friends of Saguaro National Park

O-7-1

FOSNP opposes the I-11 corridor in the Avra Valley based on the myriad of negative impacts (attached) it would have on Saguaro National Park and calls on the Arizona Department of Transportation and the Federal Highway Administration to drop all further consideration of this route in favor of upgrading, expanding and redesigning the existing transportation alignments through Tucson.

ID	Topic	Response
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O-7-1	Avra Valley	GlobalTopic_4 and GlobalTopic_1
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ID	Topic	Response
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O-7-2	Biologic Resources	GlobalTopic_1 and R-2
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Friends of Saguaro National Park

Providing financial and volunteer support for Saguaro National Park



May 11, 2019

Friends of Saguaro National Park (FOSNP) is an official not-for-profit fundraising partner of the National Park Service, created to help preserve, protect and enhance the fragile environment and unique cultural heritage of the Sonoran Desert at Saguaro National Park. We help protect natural and cultural resources, preserve native landscapes, promote environmental education, improve recreational trails, enhance visitor experiences, strengthen community partnerships, and build environmental stewardship for Saguaro National Park through philanthropy, education, volunteerism, and public awareness.

FOSNP participated in the Stakeholder Engagement Meetings at the invitation of the Arizona Department of Transportation and the Federal Highway Administration in March and April of 2018.

FOSNP opposes the I-11 corridor in the Avra Valley. This corridor would:

Negatively impact thousands of acres of protected public lands including Saguaro National Park, Ironwood Forest National Monument, Tucson Mountain Park and the Central Arizona Project's Tucson Mitigation corridor.

Cut through sensitive habitat recommended for protection by Pima County's Sonoran Desert Conservation Plan, sever critical wildlife movement corridors, block all animal migration from the Tucson Mountains to the west, disturb an unknown number of important archeological sites, impede washes, negatively impact surface water flows and increase the spread of invasive plants.

Degrade the visitor experience at Saguaro National Park by eliminating the natural quiet, destroying the scenic view sheds, threatening the survival of native wildlife species and polluting the air in a national park that is afforded additional federal protections by the Wilderness Act of 1964.

Bi-sect the 2,514 acre Tucson Mitigation Corridor of the Bureau of Reclamation, nullifying the purpose for which it was preserved and would be contrary to management guidelines that explicitly prohibit and development on these lands.

O-7-2

ID	Comment Document
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ID	Topic	Response
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0-7-2

Break Pima County's long-established and consistent public policies to preserve open space, protect wildlife habitat and movement corridors, and conserve the Sonoran Desert ecosystem by developing within the 1 mile Buffer Overlay Zone (Chapter 18.67, Pima County Town Code).

Be contrary to the purposes for which the Tucson Mountain District of Saguaro National Park was established in 1961, to protect these lands "unimpeded" for future generations to enjoy.

FOSNP believes that our community will experience economic benefits from increased trade between the United States and Mexico. To facilitate that goal, we support the upgrade, expansion and redesign of our existing transportation alignments (I-10 and I-19). This will address the outlined I-11 project purpose, needs, and help to reconnect Tucson's downtown communities that were divided during the initial construction of I-10.

FOSNP opposes the I-11 corridor in the Avra Valley based on the myriad of negative impacts it would have on Saguaro National Park and calls on the Arizona Department of Transportation and the Federal Highway Administration to drop all further consideration of this route in favor of upgrading, expanding and redesigning the existing transportation alignments through Tucson.

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ID	Topic	Response
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O-7-3	Recommended Alternative	GlobalTopic_1 and R-2
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Resolution

A Resolution of the Board of Directors for *Friends of Saguaro National Park* in opposition to construction of an Interstate II corridor alignment through the Avra Valley.

WHEREAS, Saguaro National Park was established in 1933 to protect the giant saguaro cactus, and preserve superb examples of the Sonoran Desert ecosystem, while affording unique recreational opportunities for visitors . . . and today, Saguaro National Park is the number one tourist destination in Southern Arizona, providing an economic impact of approximately \$75 million per year to the Tucson community; and

WHEREAS, the Arizona Department of Transportation is considering an "Interstate II and Intermountain West Transportation Corridor" as a means of increasing regional economic development by linking trade with Mexico and Canada; and

WHEREAS, the Pima County Administrator has suggested that the proposed Interstate II should include a 56-mile section between Casa Grande and Green Valley that would run directly through the Avra Valley, adjacent to Saguaro National Park; and

O-7-3

WHEREAS, this suggested corridor would negatively impact thousands of acres of protected public lands, including Saguaro National Park, Ironwood Forest National Monument, Tucson Mountain Park, and the Central Arizona Project's Tucson Mitigation Corridor; and

WHEREAS, this suggested corridor would cut through sensitive habitat recommended for protection by Pima County's landmark Sonoran Desert Conservation Plan . . . sever critical wildlife movement corridors, and effectively block all animal migration from the Tucson Mountains to the west . . . disturb an unknown number of important archeological sites . . . impede washes and negatively impact surface water flows . . . and aggravate the spread of invasive plants; and

WHEREAS, this suggested corridor would degrade the visitor experience at Saguaro National Park by eliminating the natural quiet . . . destroying the scenic viewsheds . . . threatening the survival of native wildlife species . . . and polluting the air in a national park that is afforded additional federal protections by the Wilderness Act of 1964; and

WHEREAS, this suggested corridor would bi-sect the 2,514-acre Tucson Mitigation Corridor of the Bureau of Reclamation - nullifying the purpose for which it was preserved - and would be contrary to management guidelines that explicitly prohibit any development on these lands; and

ID	Comment Document
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ID	Topic	Response
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O-7-3

WHEREAS, this suggested corridor would be contrary to Pima County’s long-established, consistent public policies to preserve open space, protect native wildlife habitat and movement corridors, and conserve the Sonoran Desert ecosystem; and

WHEREAS, this suggested corridor would be contrary to the purposes for which the Tucson Mountain District of Saguaro National Park was established in 1961 – to protect these lands “unimpeded” for future generations to enjoy; and

WHEREAS, the Coalition for Sonoran Desert Protection (of which *Friends of Saguaro* is a member organization) has questioned the need for any new southern Arizona corridor between the Mexican border and Phoenix – preferring expansion or upgrades to existing transportation alignments;

NOW, THEREFORE, BE IT RESOLVED that the Board of Directors for *Friends of Saguaro National Park* expresses its firm opposition to the suggested Interstate 11 corridor through the Avra Valley, and calls upon the Arizona Department of Transportation to drop all further consideration of this route.

Approved by the Board of Directors January 9, 2014.

ID	Comment Document
	Marana Public Hearing, May 11, 2019

ID	Topic	Response
O-25-1	Recreation	GlobalTopic_1, R-2 and LU-5

O-25-1

7 MR. FRED STULA: Hello. My name is Fred
 8 Stula. I'm the executive director for Friends of Saguaro
 9 National Park. We're the official not-for-profit
 10 fundraising partner of the National Park Service, created
 11 to help preserve, protect and enhance the fragile
 12 environment and unique cultural heritage of the Sonoran
 13 Desert and the Saguaro National Park.
 14 We participated in the stakeholder
 15 engagement meetings at the invitation of the Arizona
 16 Department of Transportation and the Federal Highway
 17 Administration in March and April of 2018.
 18 We oppose the I-11 corridor in Avra Valley.
 19 This corridor would negatively impact thousands of acres
 20 of protected public lands, including Saguaro National
 21 Park, Ironwood Forest National Monument, Tucson Mountain
 22 Park, and the Central Arizona Project's Tucson Mitigation
 23 Corridor.
 24 It would cut through sensitive habitat
 25 recommended for protection by the Pima County Sonoran

ID	Comment Document
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ID	Topic	Response
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O-25-1

1 Desert's Conservation Plan, sever critical wildlife
 2 movement corridors, block animal migration from the Tucson
 3 Mountains to the west, disturb an unknown number of
 4 important archeological sites, impede washes, and
 5 negatively impact surface water flows and increase the
 6 spread of invasive plants.

7 This would degrade the visitor experience at
 8 Saguaro National Park by eliminating the natural quiet,
 9 destroying the scenic viewsheds, threatening the survival
 10 of native wildlife species, and polluting the air in a
 11 national park that is afforded federal protections by the
 12 Wilderness Act of 1964.

13 This would bisect the 2,500 acre Tucson
 14 Mitigation Corridor of the Bureau of Reclamation,
 15 nullifying the purpose for which it was preserved, and it
 16 would be contrary to the management guidelines that
 17 explicitly prohibit development on these lands.

18 This would break Pima County's
 19 long-established and consistent public policies to
 20 preserve open space, protect wildlife habitat and movement
 21 corridors, and conserve the Sonoran Desert ecosystem by
 22 developing within the one-mile buffer overlay zone.

23 This would be contrary to the purposes for
 24 which the Tucson Mountain District of Saguaro National
 25 Park was established in 1961, to protect these lands

ID	Comment Document
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ID	Topic	Response
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O-25-1

1 unimpeded for future generations to enjoy.

2 Friends of Saguaro National Park believes

3 that our community will experience economic benefits from

4 increased trade between the United States and Mexico. To

5 facilitate that goal, we support the upgrade, expansion

6 and redesign of our existing transportation alignments.

7 This will address the outlined I-11 project's purpose,

8 needs and help to reconnect Tucson's downtown communities

9 that were divided during the initial construction of I-10.

10 So we oppose the I-11 corridor in the Avra

11 Valley based on the myriad of negative impacts it would

12 have on Saguaro National Park, and we call on the Arizona

13 Department of Transportation and the Federal Highway

14 Administration to drop all further consideration of this

15 route in favor of upgrading, expanding, and redesigning

16 the existing transportation alignments through Tucson.

17 Thank you.

ID	Comment Document
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ID	Topic	Response
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O-39-1	General	GlobalTopic_1 and GlobalTopic_4
O-39-2	Biologic Resources	GlobalTopic_1 and BR-5

To the Arizona Department of Transportation regarding a proposed route for I-11 through the Avra Valley.

Friends of the Sonoran Desert

July 7, 2019

Fellow Citizens:

The Friends of the Sonoran Desert, a charitable organization, headquartered in Arizona, is writing to oppose the proposed alternative route for I-11 through the region of Avra Valley, East of the Tucson Mountains. As the department is aware, the opposition to this route by Southern Arizonans is absolute and overwhelming. It is difficult to conceive of a more insulting and ill-conceived proposal.

Arizona is faced with significant transportation challenges that cannot be successfully addressed by simply doing more of the same, i.e., building more freeways. Metropolitan Phoenix is a daily demonstration of the folly of this approach. While the Department has taken years to analyze the I-11 alternatives and no doubt spent huge amounts of public money on this problem, all we have as a result for our region is a proposal to do more of the same, without any new initiatives for real alternative solutions. It is, as been a recurring observation by many Arizonans, a 20th Century solution to a 21st Century problem.

O-39-1

For Decades Southern Arizonans have worked to protect and utilize the Tucson Mountains and adjacent Avra Valley for our long-term benefit. The effort has included strong and active support for Federal and Arizona public lands in the Ironwood Forest National Monument, Organ Pipe National Monument, Tucson Mountains, as well as the conservation areas of the Tohono O'odum Nation, along with establishment of the Arizona-Sonoran Desert Museum, Old Tucson, and other recreational sites. This is an area of small communities, residences and businesses which have contributed to a major revenue source for the region, providing much loved and valued recreational areas for its citizens and visitors. Its value for the stewardship of prime Sonoran Desert habitat and wildlife has been an object of extensive efforts by Federal, State and local government for almost a century. For decades Gates Path has been a frequent destination of local residents and visitors alike for the spectacular views of this treasure.

O-39-2

Now comes the Arizona Department of Transportation to destroy that vista and all it surveys. All to build an industrial freeway through the very heart of this area destroying and eroding its values. Local

ID	Comment Document
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ID	Topic	Response
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O-39-2

and seasonal movements of wildlife would be destroyed by this construction, and it cannot be mitigated by any means available to the ADOT.

To be clear we want continued stewardship and sustainable use of this region and its assets, and we are completely opposed to the proposal, and the Department's lack of serious consideration of more proactive and realistic alternatives. FSD strongly suggests the Department immediately abandon this alternative and get serious about alternative courses for improving the movement of people and goods in our region.

Sincerely,

Roger McManus
 Member of the Board of Directors
 Friends of the Sonoran Desert.

ID	Comment Document
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ID	Topic	Response
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THE INTERSTATE 11 COALITION

July 8, 2019

Dear Interstate-11 Study Team:

On behalf of our members, I want to thank you for your work on the Tier One EIS for Interstate 11 and encourage your continued focus on the needs, wishes and understandings of the local entities who are members of our Coalition.

Regarding the Recommended Alternative, as a Coalition we wish to add our joint voice to several of the comments we are aware that have already been submitted.

1. In Pinal County where the Recommended Alternative connects to Interstate 8, we understand it is currently routed across land where Lucid Motors will be building a \$700 million factory as well as impacts a public landfill. This connecting point needs to be moved further west along the Interstate 8 alignment to avoid these impacts. I believe Pinal County officials have provided an alternative suggestion.

2. In the City of Buckeye:

a. The City, in its representation of the citizens of the Palo Verde community, has provided an alternative through this area which would move the recommended alternative south to run closer to the river and, thereby, avoid bisecting farmlands and move the eventual freeway corridor further away from existing home and residents. We support this recommendation provided by the City of Buckeye

b. Additionally, in concert with the Hassayampa Framework Study collaboratively developed with ADOT, MAG and local governments in Western Maricopa County, the City of Buckeye adopted the route through their western expansion area for a high capacity corridor as part of their General Plan and other interconnecting transportation master plans. As a result, private landowners in the area have negotiated existing development agreements which incorporate Option X (which follows the

O-53-1

O-53-2

O-53-3

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480.644.9898 Land
602.300.1050 Cell

To Date, Resolutions of Support:

ARIZONA COUNTIES – Maricopa • Pinal • Yavapai
ARIZONA CITIES AND TOWNS – Phoenix • Buckeye • Kingman • Maricopa • Wickenburg
NEVADA CITIES – Las Vegas • Boulder City
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O-53-1	NEPA Process	Thank you for your input and interest in the I-11 Corridor Tier 1 EIS. FHWA and ADOT value the feedback on the Draft Tier 1 EIS provided by your organization. GlobalTopic_4
O-53-2	Alternatives	GlobalTopic_4 The Preferred Alternative in the Final Tier 1 EIS was revised to co-locate with I-8 from the vicinity of Chuichu Road west to Montgomery Road then north along the Montgomery Road alignment to Option I2.
O-53-3	Land Use	GlobalTopic_2 and GlobalTopic_4

ID	Comment Document
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O-53-3 Hassayampa Framework Study) within the city limits of Buckeye. We concur with the City of Buckeye and other regional planning and business organizations that Option X best meets the public purpose and need objectives of Interstate 11 by “providing access to planned growth areas” and is “consistent with local and county level planning” and urge you to move the Recommended Alternative to follow Option X through that portion within the Buckeye city limits.

O-53-4 3. During the public hearing in Wickenburg, a group of citizens living in a subdivision Northeast of Wickenburg along US 93 near the northernmost connection of the Interstate 11 Recommended Alternative with US 93 requested that the point of intersection be moved further west of their neighborhood. I understand that this point was selected, partially, due to the City of Wickenburg requesting that the point of intersection be located as close as possible to the city limits. We support the re-evaluated request to move this intersection further west along US 93.

O-53-4 Again, our appreciation for your diligent effort to advance the EIS process regarding Interstate 11 in Arizona. We appreciate the support of Governor Ducey, as indicated in the attached letter he recently sent to Secretary of Transportation, Elaine Chao.

O-53-4 Please let me know if there are any questions regarding our letter and recommendations. I look forward to continuing to work with the Study Team on our mutual goal of finding the best route for Interstate 11 that will provide economic enhancements to our State.

Sincerely,

SCOTT HIGGINSON

Executive Director

ID	Topic	Response
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O-53-4	Wickenburg +VR	GlobalTopic_5
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STATE OF ARIZONA
OFFICE OF THE GOVERNOR

DOUGLAS A. DUCEY
GOVERNOR

EXECUTIVE OFFICE

June 24, 2019

The Honorable Elaine L. Chao
Secretary, U.S. Department of Transportation
Attn: Jannine Miller, Sr. Advisor to the Secretary
1200 New Jersey Avenue SE
Washington, DC 20590

Dear Secretary Chao,

The State of Arizona is committed to the full development of Interstate 11, America's newest Interstate, traveling 450 miles north from our border with Mexico to the Colorado River and our border with Nevada.

Interstate 11 will be a significant improvement to Arizona's system of high-priority, high-capacity, access-controlled transportation corridors traversing our state. It will connect major economic centers, relieve congestion in downtown Phoenix and along Interstate 5 in California, stimulate economic development and improve trade and commerce connectivity with Mexico and throughout the Intermountain West. It truly is an Interstate of state, national and international importance.

A 20-mile segment of Interstate 11 is already open for travelers in Nevada and, working with the Federal Highway Administration (FHWA), the Arizona Department of Transportation (ADOT) is well along in the National Environmental Policy Act (NEPA) Tier One process for identifying the potential route for Interstate 11 from Wickenburg, Arizona to the Mexican border. A Recommended Alternative has been determined, public hearings have been held throughout the state and the public comment period is set to close on July 8, 2019.

After another 18 months of consideration of the public and community input received throughout this process, we anticipate FHWA will issue a final Record of Decision (ROD) in early 2021. This will enable all of us to focus our attention on the next step, a Tier Two evaluation, when the deeper environmental analysis and review occurs and an actual 300/400-foot-wide, on-ground alignment can be determined.

I'm writing to seek your assistance on two fronts:

1. We must keep the Tier One process moving forward and in compliance with Federal regulations. Once the Tier One Study is completed, we need your support in immediately moving forward to the Tier Two evaluation for any "segments of independent utility" that have been included in a local Transportation Improvement Program and are ready for further evaluation, planning, and actual construction. If there are ways to speed up the Tier One process for any segments of independent utility, we would like to work with FHWA to move those segments forward more rapidly through the NEPA process to reach a ROD sooner than 18 months from now.
2. Federal funding support will be needed going forward. The \$15 million spent to conduct the Tier One Study and all other costs incurred to date, have been borne by the State of Arizona. Moving forward, funding will need to come from all levels of government and the private sector, which could include right-of-way donations. We need your support to identify and receive additional federal assistance through federal DOT grants and/or legislation to contribute and participate in the funding of the more rigorous Tier Two evaluation process.

There is still much to be accomplished before this critical new Interstate is open and we can all enjoy its benefits to our citizens and our national economy.

As a state, in partnership with local governments, we will be ready to do our part in moving Interstate 11 along to eventual construction. I look forward to working with the Trump Administration, our Congressional Delegation, and the Department of Transportation to engage the federal government in not only the NEPA approval process for Interstate 11, but in the vital need to fund our joint efforts going forward.

Sincerely,

Douglas A. Ducey
Governor
State of Arizona

ID	Comment Document
	Tucson Public Hearing, May 8, 2019

ID	Topic	Response
I-1357-1	Recommended Alternative	GlobalTopic_1, LU-3

I-1357-1

13 KYLIE WALZAK:
 14 Good Afternoon. My name is Kylie Walzak and
 15 I'm a resident of Tucson, living west of I-10. I
 16 represent a non-private transportation efficacy
 17 organization called Living Streets Alliance. We
 18 advocate for a striving Tucson by creating great
 19 streets for all of us. Great streets are places that
 20 connect people to each other, as well as destinations.
 21 They are public space belonging to people, taxpayers,
 22 that help everybody thrive economically, as well as
 23 socially.
 24 I oppose the recommended alternative route
 25 described in the Tier I draft Environmental Impact

ID	Comment Document
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ID	Topic	Response
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I-1357-1

1 Study for I-11 because it is not a great street.
 2 While massive in both size and scope, the recommended
 3 alternative stands in opposition to everything
 4 Tucsonans value and work towards to ensure a more
 5 just, resilient, sustainable and equitable community,
 6 now and for the future. We can't build our way out of
 7 congestion.

8 The only reasonable, prudent approach to
 9 reducing congestion is to give reliable, safe and
 10 convenient alternatives, and reduce the number of
 11 single-occupant cars on roads. This is true, no
 12 matter what technologies are headed our way to
 13 automate the driving experience.

I-1357-2

14 If co-locating I-11 with I-19 and I-10 to the
 15 Tucson region does not result in enough capacity to
 16 meet projected growth and demand models, what is the
 17 \$3.9 billion, the recommended alternative is estimated
 18 to cost seven times the cost of the co-located
 19 options. It would be better to lay the groundwork for
 20 high-speed rail, reducing car trips, injecting
 21 existing corridor of communities, many of which are
 22 struggling in low income with much needed economic
 23 activity, mitigating the effects of urban sprawl,
 24 reducing carbon emissions and ensuring the entire
 25 generation of Arizonans have mobility options that

I-1357-2	Transportation	AC-9, LU-3
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I-1357-2

1 don't also compromise the environment.

2 We know about induced demands. We know how
 3 ecologically destructive and unsustainable urban
 4 sprawl is. We also know sprawl is contributing to
 5 feelings of alienation and isolation, particularly in
 6 our young people. There's devastating consequences.
 7 We know today's kids are running out of places to
 8 experience the natural world undisturbed by humans.
 9 We're also running out of time.

I-1357-1

10 I'll close with this, from Nathaniel Rich,
 11 author of Losing Earth. Everything is changing about
 12 the natural world, and everything must change about
 13 the way we conduct our lives. It's easy to complain
 14 that the problem is too vast, and each of us is too
 15 small. But there's one thing that each of us can do
 16 ourselves in our homes, at our pace, something easier
 17 than taking out recycling or riding a bike, or turning
 18 down the thermostat. Something more valuable.

19 We can call the threats to our future what
 20 they are. We can call the villains villains, the
 21 heroes heroes, the victims victims, and ourselves
 22 complicit. We can realize that all this talk about
 23 the fate of Earth has nothing to do with the planet's
 24 tolerance for higher temperatures, and everything to
 25 do with our species' tolerance for self-dilusion. We

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Page 36

I-1357-1

1 can understand that when we speak about things like
2 fuel efficiency standards or gasoline taxes, or
3 methane clearing or new interstates, we are speaking
4 about nothing less than all we love and all we are.
5 Thanks.

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ID	Topic	Response
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O-50-1	Orange Alternative	GlobalTopic_4 and GlobalTopic_1
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8 July 2019

Re: I-11 DRAFT TIER 1 ENVIRONMENTAL IMPACT STATEMENT AND PRELIMINARY SECTION 4(f) EVALUATION (DRAFT TIER 1 EIS) Nogales to Wickenburg

Dear Sir or Madam:

The Maricopa Audubon Society* wishes to comment on the I-11 Draft Tier I EIS. We commend the Federal Highway Administration and the Arizona Department of Transportation for completing this level of evaluation of alternative alignments for the proposed Interstate 11. We do, however, have some specific and general comments which we hope you will consider as the planning process continues.

In general, we implore you to use existing transportation rights-of-way wherever possible and avoid new alignments unless they are essential to accomplishing the need for the project. To that end, we believe that new alignments should be limited to the segment from Interstate 10 north to US 93, and that alignment should follow the currently proposed Orange Alternative. All other portions of the proposed I-11 should be confined to existing ROW to minimize social, economic, and environmental impacts. Below we enumerate some more specific recommendations:

1. Beginning in Nogales, use existing Interstate 19 but add lanes to increase capacity while minimizing impacts to T&E species and other localized resources.
2. Implement a true *multimodal* transportation system within the existing I-10 corridor from Tucson to Phoenix.
3. Co-locate Interstate 11 with Interstate 19 north to Tucson and then do the same with Interstate 10 until Casa Grande when it would co-locate with Interstate 8 west to Gila Bend, adding additional lanes to increase capacity, as necessary.
4. Improve State Route 85 from Gila Bend to the I-10 T.I. to Interstate standards.
5. North of Interstate 10, follow the Orange Alternative to US 93 north of Wickenburg.
6. Improve US 93 to Interstate standards north to the Nevada state border.

Minimizing the need for new alignments and new rights-of-way will significantly lower the cost of this roadway and greatly reduce its environmental, social, and economic impacts throughout the corridor.

O-50-1

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ID	Topic	Response
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O-50-1

We urge you to adopt this wiser, more conservative approach in the long-term interest of our state and our nation.

Sincerely,

Mark W. Larson
 President
 MARICOPA AUDUBON SOCIETY
 Phoenix, Scottsdale, and Tempe, Arizona

*The Maricopa Audubon Society is an all-volunteer chapter of the National Audubon Society. We have been active throughout Arizona and the southwest since our inception in 1954. Our membership consists of approximately 2,000 member families in the Valley of the Sun and elsewhere. Not only do we actively recreate in portions of the I-11 corridor, but we also work to conserve our natural heritage to ensure that future generations can enjoy these environmentally sensitive places in Arizona.

ID	Comment Document
Tucson Public Hearing, May 8, 2019	

ID	Topic	Response
I-1324-1	Biologic Resources	GlobalTopic_2 and BR-4

I-1324-1

24	TICE SUPPLEE:
25	My name is Tice Supplee. I'm representing the

ID	Comment Document
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ID	Topic	Response
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1 National Audubon Society state office.

2 I missed your meeting in Buckeye. I'm here to

3 speak specifically about the proposed route that

4 parallels the Gila River.

5 I feel your analysis is lacking as it relates

6 to a federally endangered bird, the Yuma Ridgway's

7 Rail. That bird was on the original endangered species

8 list. It's still there. And because of that, critical

9 habitat was never designated for this bird.

10 I'm currently conducting a study to document

11 and model the likely location of this bird on the Gila

12 River corridor.

13 The return flows from Buckeye Irrigation

14 District, and the farming in that corridor are what

15 allows for that bird to exist.

16 Because the Gila River is diverted and highly

17 regulated, the farming matrix, in association with that

18 segment of the river, is critical to the survival of

19 this bird.

20 I would recommend that the routing ideally go

21 down 85 and tie into 10 further south. And I also

22 suggest that if you insist on your proposed routing so

23 that you can tie into the 303 and the State 30, that

24 the alignment be north of the delivery canal for the

25 Buckeye Irrigation District. Thank you.

I-1324-1

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ID	Topic	Response
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National Parks Conservation Association

April 18, 2019

I-11 Tier 1 EIS Study Team c/o ADOT Communications
 1655 W. Jackson Street Mail Drop 126F
 Phoenix, AZ 85007

Also submitted online and emailed to I-11ADOTStudy@hdrinc.com

Re: the I-11 Draft Tier 1 Environmental Impact Statement and Preliminary Section 4(f) Evaluation (Draft Tier 1 EIS) Nogales to Wickenburg

Request for extension of comment period

National Parks Conservation Association (NPCA) respectfully requests that the Federal Highway Administration (FHWA) and the Arizona Department of Transportation (ADOT) extend the public comment period for the above-referenced Draft Tier 1 EIS by a minimum of sixty-four days beyond the currently scheduled public comment deadline.

National Parks Conservation Association (NPCA) is a nonprofit organization that for 100 years has been the leading voice advocating for our National Parks. NPCA has more than 1.3 million members and supporters, including more than 24,000 in Arizona.

NPCA needs additional time to complete and submit a detailed review of the Draft Tier 1 EIS. Further, the public deserves more time to review and comment on this long and complex document.

Please consider:

- A 56-day comment period (April 5 through May 31) does not provide enough time to adequately review this document and prepare well-researched comments on concerns the document may raise.
- Volumes one and two of the Draft Tier 1 EIS (six chapters) total 762 pages, not including the additional twenty-six appendices.
- The public has shown great interest and concern about this planning process. In the previous two scoping periods, the public expressed specific opposition to the route alternative through the Avra Valley, which has been incorporated into the Draft Tier 1 EIS preferred alternative. This level of interest and concern merits more public scrutiny.
- A public works project that could cost as much as \$7 billion warrants as much transparency and public involvement as possible.
- The nationally-significant natural and cultural resources to be evaluated and, perhaps, significantly affected by the result of this process, are worthy of careful consideration. The agencies have taken a lot of time to develop a section 4F analysis, so it is fitting that a longer comment period would be required to gather quality input from the public, experts, and knowledgeable organizations in the preparation of this EIS.
- NPCA is especially concerned that enough time be taken to analyze a proposed freeway that would run one mile from Saguaro National Park and through protected mitigation lands that are important to wildlife which have a habitat that includes the park.

O-4-1	Comment Period Extension	GlobalTopic_9 and GlobalTopic_1
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O-4-1

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ID	Topic	Response
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0-4-1 The Draft Tier 1 EIS preferred alternative route overlooks previous input from citizens, experts, and land-managing agencies like the National Park Service. These groups deserve adequate time to comment on what has been proposed before the final decision-making process proceeds.

The development of this document has already taken three years and there is no immediate source of funding for Tier 2 documentation. Therefore, there does not appear to be any sort of urgency preventing extension of the public comment period to a total of 120 days.

We strongly urge that the comment period be extended to August 3.

Thank you.

Best wishes,

Kevin Dahl
Arizona Senior Program Manager

ID	Comment Document
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July 8, 2019

I-11 Tier 1 EIS Study Team c/o ADOT Communications
 1655 W. Jackson Street Mail Drop 126F
 Phoenix, AZ 85007

Sent via email: I-11ADOTStudy@hdrinc.com

Re: Comments on the Interstate 11 Tier 1 Draft Environmental Impact Statement, Nogales to Wickenburg

Dear Study Team members:

National Parks Conservation Association (NPCA) appreciates the opportunity to provide comments on the *Interstate 11 Tier 1 Draft Environmental Impact Statement, Nogales to Wickenburg (DEIS)*. Since 1919, NPCA has been the leading advocate for the National Park System, with 1.3 million members and supporters, including 30,000 in Arizona, who want to make sure our children and their children can enjoy the beauty, majesty, and cultural heritage provided by parks like Saguaro National Park.

NPCA strongly opposes the selection of the recommended route for I-11 through Pima County that would produce a new freeway at the doorstep of the highly visited west unit of Saguaro National Park, impacting park resources and the visitor experience. A more convenient, less expensive, and less destructive alternative – co-location along existing freeways through Tucson from between Sahuarita and Casa Grande – should be selected as the southern part of the preferred alternative.

Summary

NPCA provided comments during the first and second scoping periods for this project and was an active participant in the special stakeholders’ engagement meetings. We are surprised that the Federal Highway Administration (FHWA) has released a DEIS that recommends a route so thoroughly opposed in the majority of comments from cooperating agencies, local governing bodies, the public (and not just those living along the Avra Valley alternative routes), and nonprofit groups such as ours. Using a tiered approach to the normal National Environmental Policy Act (NEPA) process will not work for the route selection decision in the South part of this corridor, where there are two very different choices to be compared. Further, in preparing the DEIS, FHWA used a flawed section 4(f) analysis. We urge the FHWA/Arizona Department of Transportation (ADOT) team to carefully review the input they have received during this comment period and to select co-location along existing freeways I-19 and I-10 from Sahuarita to Casa Grande as the preferred alternative route in the Final Environmental Impact Statement. The co-location route better meets the purposes and need of I-11 because it serves the economic needs of Tucson, is less expensive, is easier to construct incrementally, avoids any

O-49-1

ID	Topic	Response
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O-49-1	Recommended Alternative	Thank you for your input and interest in the I-11 Corridor Tier 1 EIS. FHWA and ADOT value the feedback on the Draft Tier 1 EIS provided by your organization. GlobalTopic_4 and GlobalTopic_1
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ID	Comment Document
O-49-1	<p>impacts to important protected areas and several rural communities west of Tucson, would allow some multi-modal planning and co-location, and would provide an opportunity for transportation planners and the larger community of Tucson to be involved in 21st-century innovations to move people and freight.</p>
O-49-2	<p>Tiering of the DEIS violates NEPA for failing to fully identify and analyze environmental impacts at the project level, including adverse environmental impacts to Saguaro National Park and other resources</p> <p>NPCA has stated from the beginning of the public input process that the decision whether to route I-11 west of Tucson in the Avra Valley (routes labelled Purple, Green, or Recommended in this document, originally and still sometimes referred to as segments C, D, and F) or co-located along existing freeways (Orange, or segments B and G) is a major federal decision that requires and deserves a full NEPA process before a selection is made. The Tier 1 process does not provide the site-specific detailed information on costs, impacts, cumulative and synergistic impacts, mitigation details, etc. that are needed to make an informed and credible decision.</p> <p>Throughout the Tier 1 DEIS document, even where potential impacts are well-listed, the impacts are not quantified. The decision is therefore being made with no real plans of how to best avoid or mitigate those impacts. This major decision to either build a new freeway route or to co-locate along existing freeways is not such a case. The level of controversy, opposition, the high price differential, and the many instances of this DEIS punting the resolution of impact concerns to the Tier 2 process, supports our contention that you cannot route a new freeway in Avra Valley with only half a NEPA process.</p> <p>The DEIS sometimes lists potential mitigation strategies, but always with the promise that what will be done will be determined only after Tier 2 analysis. The conundrum is that an important decision – a ROD with the preferred alternative – is to be determined without certain knowledge of whether such mitigation is feasible or likely to be successful. For instance, the plan to bisect the Tucson Mitigation Corridor (TMC), discussed in more detail below, relies on the promise of future wildlife studies that would be needed to design (let alone prove) that a plan to do “net benefit” mitigation is possible. This relies on new studies that would provide information that goes opposite to current professional opinions of wildlife experts and agencies: that it is highly unlikely or even impossible to achieve such mitigation.</p> <p>Another clear example of how the Tier 1 process cannot review adequately potential impacts is this DEIS’s very poor coverage of how the location of the recommended alternative will impact the City of Tucson’s water operations in the Avra Valley, facilities that provide almost all of Tucson’s water supply. At a recent public meeting of the City Council a representative of ADOT was unable to answer Tucson’s concerns to the point that one city council member said during the meeting, “Over my dead body will ADOT build a freeway in Avra Valley!” – a sentiment he</p>

ID	Topic	Response
O-49-2	NEPA Process	GlobalTopic_8, GlobalTopic_11 and GlobalTopic_1

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ID	Topic	Response
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O-49-2 repeated in an article emailed to his constituents.¹ As is shown further on in these comments the DEIS discussion on this important point is remarkably shallow.

The decision to choose a recommended alternative for the route of I-11 between Sahuarita and Casa Grande seems much more a project-level conclusion than a programmatic one because the choices are so different and the impacts so many, so controversial, and so complex. The law permits tiering only if the first tier is a programmatic statement, and the second tier is site-specific. Thus, this project-level decision should be made only after a full EIS analysis as required by NEPA. In addition, our reading of the programmatic review in this DEIS is that it does not support the binding, site-specific conclusion that placing the freeway route in Avra Valley is better than co-locating it along existing freeways between Sahuarita and Casa Grande. In this case, tiering is being unlawfully used in violation of NEPA to avoid consideration of reasonable alternatives by deferring consideration of site-specific issues to a subsequent environmental impact statement (Tier 2).

Recommended Alternative has too many significant impacts to Saguaro National Park and other nearby protected areas, too many to be adequately addressed in a tiered EIS

O-49-1 The following specific concerns NPCA has about impacts a potential Avra Valley freeway would have on the park, directly and indirectly, lead us to support co-location. Collectively, our concerns about these impacts shows the Tier 1 DEIS does not adequately evaluate the project's direct, cumulative, and secondary effects under NEPA as required by law.

Visual

O-49-3 Many people who visit Saguaro National Park's West Unit, from across the country and around the world, are treated to a first-class introduction to the saguaro forests and the rich vegetation of the Sonoran Desert. Some visit briefly, stopping at the visitor center and taking a short walk in the desert to take a few photos while they marvel at the unusual plants, colorful birds, and other sights of this premier national park. Others take the time to visit all the scenic and informative stops, and some might take one of the longer hikes – up King's Canyon or one of several other trails to the top of Wasson Peak. Park Rangers and volunteers offer educational programs, including special overnight camps for young people. The dramatic petroglyphs of Signal Hill are a popular draw, where modern visitors can ponder what it was like for others before us to live in this unusual and special place.

For almost every visitor, the vistas across Avra Valley, largely unimpacted by the sparse development to be seen there, is a part of their experience of a trip to this part of Saguaro National Park. And almost every future visitor will have their experience at Saguaro National Park impaired if these vistas are bisected by a new freeway.

Visual representation of this impact, which is a prerequisite for any analysis of impact, was not done in this Tier 1 analysis. If an Avra Valley freeway route is to be considered, the freeway

¹ <https://www.tucsonaz.gov/ward-3/news/pauls-note-friday-june-21st-2019>

O-49-3	Visual	GlobalTopic_1 and V-1
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ID	Comment Document
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O-49-3
 superimposed on existing views should be done for every popular location in the park before locking in the decision for I-11 to be built so close to the park. Visual impact would be eliminated if the I-11 is co-located with I-19 and I-10 from Sahuarita to Casa Grande because adding a few lanes does not change the visual nature of what already exists on this route.

Visual impact to Saguaro National Park is one of the reasons that NPCA believes co-location is a better alternative.

O-49-4
Sound
 The Sonoran Desert derives its name from the Spanish word for sonorous in recognition that this place is remarkable for its beautiful sounds. Residents and visitors alike enjoy the early morning symphony of bird sound, among the chorus you might hear the je-je-jeeee of the black throated sparrow, the cascading notes of the canyon wren, or the amazingly wide repertoire of the mockingbird. On the trail you will hear rustlings of rodents and lizards in leaf litter, and you might be warned of danger by the iconic rattle of the Western Diamondback snake. Even the wind makes music, making dry tree branches become percussion instruments to accompany the flutter of leaves.

The decidedly urban sounds of cars and trucks on a nearby freeway will provide a completely different and unwelcome soundtrack. The annoying repetitive beeps of a truck backing up to deliver cases of soda and beer to the inevitable gas station at every freeway exit will compete with the lilting cries of a family of Gambel’s quail or the faraway yips of coyotes.

Adding freeway and new development noises to the acoustic ecosystem of Saguaro National Park will impact not just visitor enjoyment. It is well-documented that unnatural or introduced noise affects wildlife health and behavior.²

A quick review of standard decibel levels at various distances between the potential freeway route and the park is not an adequate environmental review. The park deserves real modelling and sound tests, ones that account for the varied topography of this area. All of the park is at higher elevation than the proposed freeway route, and some locations will have unobstructed line-of-sight views of the freeway. Sound carries far in the desert. The agencies proposing this new freeway must review the probable impacts of the noise it will generate and show how noise impacts will be avoided or mitigated as conventional NEPA practice would require.

To protect Saguaro National Park wildlife and visitors from the intrusive sounds of a new freeway is one of the reasons that NPCA believes co-location is a better alternative.

O-49-5
Air Pollution
 Saguaro National Park is a Class 1 area and is supposed to be making reasonable progress toward national visibility conditions. NPCA has serious concerns about how far off track the

ID	Topic	Response
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O-49-4	Noise	GlobalTopic_1 and N-2
O-49-5	Air Quality	GlobalTopic_1, GlobalTopic_8, AQ-1, AQ-2 and AQ-3

² See explanation and references at https://www.nps.gov/subjects/sound/effects_wildlife.htm

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ID	Topic	Response
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O-49-5

park is from clean air.³ Building a freeway next to the park, which would bring pollution from nearby car and truck emissions, additional emissions from resulting development, and dust from construction and traffic, will certainly not help.

To protect the park, and the lungs of residents and visitors, it is imperative that air models be run on all the alternatives – a qualitative as opposed to quantitative assessment does not suffice – to determine the best alternative. Modeling should be comprehensive and include as close to real time/actual background emissions.

In the DEIS a 2011 Arizona Department of Environmental Quality study is used to show this sector's emissions of nitrogen oxides and particulate matter. That 2011 study predicts that 2018 emissions of nitrogen oxides from vehicles contributed 23 percent of total statewide emissions. That contribution is not minor, and so it should be modeled to determine impacts on National Ambient Air Quality Standards (NAAQS, visibility, and other air quality related values at Class 1 areas). We also question whether this NEPA process should rely on the 2011 study as that study is likely outdated. Ecosystems at Saguaro are nitrogen limited and are especially impacted by nitrogen deposition from air pollution.⁴

Several NAAQS nonattainment areas are in the study footprint and would be impacted, so it is necessary to ensure conformity with all Clean Air Act requirements by providing a path forward to help bring the areas in nonattainment back into attainment.

At Saguaro National Park, particulate matter, ground level ozone, sulfur compounds, and nitrogen compounds are air pollutants of particular concern. Further studies on the impact of I-11 on the park should assess these items and be done in close coordination with the Park Service. Any projected impacts should be well mitigated with plans to monitor progress and accommodate or correct the course if the mitigation measures don't work or don't work as well as expected.

From the analysis done to date, co-location is the better build alternative in terms of air pollution, and especially in air quality impacts at Saguaro National Park. For this reason among others, NPCA supports co-location as the better choice.

Climate Change

The DEIS impact statement needs to do more than give four paragraphs of lip service to the production of greenhouse gasses in this proposed federal project. Our transportation sector adds a lot to the deadly serious problem of climate change, and we have an obligation to do all we can to prevent additional carbon emissions especially from large projects like the building of freeways. NPCA is particularly concerned because we know climate change is already impacting Saguaro National Park's natural resources and is likely to do considerably more damage before we get carbon emissions under control.

³ <https://www.npca.org/reports/air-climate-report>

⁴ <https://www.nps.gov/articles/airprofiles-sagu.htm>

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O-49-6	Biologic Resources	GlobalTopic_1, GlobalTopic_11, BR-1, BR-2 and BR-6
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O-49-5

Many millions of tons of extra carbon will be released should the recommended alternative route be chosen by FHWA and Interstate 11 constructed in Avra Valley. The DEIS does not do adequate analysis as required by law to determine ways to avoid or mitigate these emissions that are certain to occur. The ways this decision will add carbon and affect climate change in a negative way are:

1. Construction of the freeway, including raw material production, transportation of those materials, and onsite construction.
2. Maintenance of the freeway during its lifespan.
3. Vehicle emissions, with a new freeway encouraging more vehicle miles travelled.
4. Commercial development and residential sprawl spurred by the new freeway.

Co-location of I-11 with I-10 and I-19 from Sahuarita to Casa Grande will have smaller impacts in the first three categories. It will not contribute to suburban sprawl, the fourth category. The impacts will be less because there will be many fewer lane miles constructed. In addition, there would be more opportunities for freight traffic, travelers, and commuters to utilize other modes of transportation (rail, public transit, carpools, etc.) that contribute less carbon.

The Avra Valley freeway route's greater contribution to the release of carbon into the environment and subsequent promotion of climate change is one of the reasons that NPCA believes co-location is a better alternative.

Wildlife Connectivity

Last but not least of our concerns about direct impacts to the park is how a north-south freeway to the west of Saguaro National Park's west unit would cut off the park (and Tucson Mountain Park directly to the park's south) from wildlife in protected and wild areas across the Avra Valley. There are important wildlife linkages that connect the Park with places like Ironwood Forest National Monument and the mostly undisturbed open spaces on the Tohono O'odham Nation south of the monument. A freeway here would end almost all significant wildlife movement. Such a valley-long impediment cannot be mitigated by purchase of off-site comparable acreage. Wildlife crossings can be designed and built, and are useful, but we would want to see specific plans and costs for these for the Avra Valley route before we would begin to believe that such would solve the problem caused by a freeway in this location. The Tier 1 standard operating procedure of offering a promise of mitigation is not good enough and is inadequate under NEPA.

O-49-6

We are not convinced that your investigations into mitigating a freeway through the Tucson Mitigation Corridor will result in adequate wildlife connectivity to avoid impacts to Saguaro National Park. This DEIS and draft preliminary Section 4(f) evaluation proposes that it does, but does not make a scientific case that simply locating it along the CAP canal would avoid the massive impact to wildlife that a freeway in the TMC and throughout the Avra Valley would have.

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O-49-6 Without free flow of wildlife in and out of Saguaro National Park and the other protected areas affected, we would see devastating and irreversible consequences for wildlife diversity, genetic health, and overall ecosystem resilience.

O-49-6 There are wildlife connectivity problems with the existing I-19 and I-10 alignments, which ironically might be helped by co-locating I-11 along them. In adding new lanes, it would be possible to also add wildlife crossings at key points, including at the north end of the Tucson Mountains to provide a crossing into the Tortolita Mountains, which would aid Saguaro wildlife populations.

Recommended Alternative impacts to Tucson, Avra Valley, and nearby protected areas

Sprawl development and impacts to current residents

O-49-7 As you have heard rather loudly from Avra Valley residents, almost no one currently living there wants to sell their home to allow for a freeway or stay and find that their country lifestyle has been destroyed by having a freeway nearby. Not only will this unwanted freeway become part of the valley, the commercial development (gas stations, motels, strip malls, etc. that spring up at freeway interchanges) and increased housing construction associated with new transportation corridors will soon follow. Many of Saguaro National Park’s staff and volunteers live in current Avra Valley neighborhoods and have spoken up alongside their neighbors to oppose the recommended alternative.

The increased growth that will spring up at every interchange and beyond will also add to the other impacts to the Park noted earlier, including light, noise, impacts to wildlife, etc.

Increased traffic on roads into Tucson, including an important park road

O-49-8 Nowhere mentioned in the DEIS is how freeway traffic and regular traffic from the subsequent growth in residential development will increase traffic on existing roads that connect Avra Valley to Tucson. Through the Tucson Mountains there are only two routes – one through Gates Pass (internal to Tucson Mountain Park) and the Picture Rocks Road (internal to the Saguaro National Park, which is responsible for this road). In addition to tourist access, both these routes provide commuting between Avra Valley and Tucson. No one living or working in Avra Valley is likely to take the freeway north or south and then return to Tucson, though some in the south might access Ajo Boulevard and some in the north will take one of several roads into Marana. Increased traffic on Picture Rocks road, which can be very crowded during rush hour, and Gates Pass Road, need to be evaluated in this DEIS.

Gateway visitor experience

O-49-9 The authors of the DEIS seem to be hopeful that the recommended alternative would be helpful to the Tucson area’s important tourism economic sector, a sentiment that could not be included if a more thorough analysis had been done of each alternative’s impact to tourism.

O-49-7	Land Use	LU-3
O-49-8	Transportation	GlobalTopic_1, IC-1
O-49-9	Economics	GlobalTopic_1, E-2 and E-4

ID	Comment Document
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ID	Topic	Response
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O-49-9

From the DEIS, page 3.6-7. "The economic impact analysis qualitatively considers the impact on outdoor and wildlife-related recreation and national parks, such as Saguaro National Park (SNP). The Build Corridor Alternatives may have positive or negative effects on these resources. For example, the Build Corridor Alternatives may open access and make it easier for more people to visit the region and its parks." Also: "I-11 has the potential to provide better access and opportunities for appropriate gateway services, such as lodging, that enhance ecotourism. Carefully planned, I-11 can help further the growth of outdoor tourism as an anchor of the local economy." This sentiment is repeated in the summary on page 3.6-17.

This is not the way to do an environmental analysis, even at the programmatic, qualitative level. It is not acceptable under NEPA to simply identify an impact and say that it can have positive or negative effects.

As I have taken hundreds of visitors to Saguaro National Park, let me explain the current experience. We drive west into the Tucson Mountains, enjoying the transition from city to county park and the beautiful saguaro-covered hills. At the top of Gates Pass we often stop to marvel at the vista to the west, Avra Valley. We can see Old Tucson, and I explain how many western movies and TV shows have been filmed in this location. While some houses and other human features can be seen in the vast expanse of Avra Valley, the overarching view is one of open space and non-urbanity. Driving down into the valley, we pass the world-famous Arizona-Sonora Desert Museum and stops there will include the experience of seeing the unimpacted Avra Valley in the background – especially during the amazing free-flight program performed with rescue hawks and owls. Next stop is the park visitor center and we are then off to for a hike, enjoying the unusual desert vegetation and geology, soundscape and sights. We might also stop to see petroglyphs Signal Hill, and then take scenic Picture Rocks Road back into town.

There is no way that I could say with a straight face that a freeway in Avra Valley would enhance this eco-tourism experience. No one plans their trip because a new freeway near a natural attraction would allow them to get there minutes faster, stay in a nearby chain motel by a freeway, or have a meal in a chain restaurant. The Saguaro National Park and area ecotourism experience is currently being met much better by existing scenic roads, charming Bed and Breakfast opportunities, a great dude ranch on the north side of the park, and accommodations from inexpensive motels to five-star resorts not all that far away in Tucson and environs. Current Avra Valley restaurants like Coyote Pause, Ironwood Terraces Restaurant, and Ocotillo Cafe are in keeping with the quality and diversity of dining opportunities afforded by Tucson, as shown by its designation by the United Nations as the first "City of Gastronomy" in the United States.⁵

Finally, consider Grand Canyon National Park. Six million visitors annually to this premier ecotourism experience and the park is not within an hour's drive of a freeway.

⁵ <https://www.visittucson.org/become-a-tucson-foodie>

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O-49-9 The negative impact to the gateway experience of park visitors, their access to outdoor recreation, and tourism in general are some of the reasons NPCA supports an I-11 that would be co-located along I-19 and I-11 from Sahuarita to Casa Grande over any alternative that would be through Avra Valley.

Impacts to nearby protected areas

Saguaro National Park is surrounded by other protected public lands, connected by broad wildlife linkages. The health of these places is tied to the health of Saguaro’s ecosystem. The recommended alternative would have similar impacts to Tucson Mountain Park, Ironwood Forest National Monument, and other places.

Invasive species

O-49-10 The most dangerous invasive species in Pima County that this project needs to plan to prevent is buffelgrass. This explosively fire prone, fast-spreading import threatens to change the Sonoran Desert into a degraded African savannah as few plants except itself survives fires fed by stands of buffelgrass. Fire is not possible in healthy Sonoran Desert because there is plenty of open space between plants; when it invades buffelgrass fills in those spaces. In residential settings it can fuel deadly fires. It produces lots of seeds and spreads quickly in disturbed soils and along roadsides where it thrives on the extra water than runs off the roadbed. Saguaro National Park is using both staff and volunteer resources to reduce buffelgrass populations in the park, as are managers for other protected spaces in the area, but they are far from done with this difficult task.

While buffelgrass is also of concern along I-10 and I-19, the recommended alternative’s new freeway would produce a greater need for buffelgrass prevention and removal. This is one of the reasons NPCA supports co-location with I-19 and I-10 from Sahuarita to Casa Grande.

Tucson’s water supply

O-49-11 The preferred alternative’s impact to the two City of Tucson facilities in Avra Valley that recharge Central Arizona Project water and retrieves it to supply most of the city is surprisingly missing from the DEIS (including the technical appendix E13 which has a total of four references and all are of descriptive nature). The potential impact to this facility has enormous ramifications, yet is only mentioned briefly in the water section, which states in Table 3.13-3 that for both the Green and Purple alternatives “Edge of corridor is located within 1,000 feet of the CAVSARP and SAVSARP.” Also, on page 3.3-13 the DEIS states that using the CAP Design along Option C “would avoid impacting properties associated with the City of Tucson’s CAVSARP/SAVSARP facilities.” On page 3.3-23 the DEIS states that using the CAP Design along Option D “would avoid impacting properties associated with the City of Tucson’s SAVSARP facility.” Is it one or is it both? The City of Tucson has expressed their concerns for these all-important facilities, and we don’t believe those concerns have been answered in this DEIS.

As concerns all water resources, Table 3.13-2 Summary of Potential Impacts on Water Resources describes the Orange Alternative as determined at this Tier 1 level to have only low

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O-49-10	Biologic Resources	GlobalTopic_1 and BR-1
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O-49-11	Water Resources	WR-1 and GlobalTopic_1
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O-49-11	<p>to moderate impacts, while the recommended alternative is uniformly high as concerns surface water (sensitive resources), surface water (impaired waters), groundwater, potential waters of the U.S., wetlands, and floodplains.</p> <p>The impact to water is one of the reasons NPCA opposes any freeway in Avra Valley and urges that I-11 co-located along I-19 and I-10 between Sahuarita and Casa Grande become the preferred alternative.</p>
O-49-12	<p><u>Impacts to Riparian Areas</u></p> <p>The simplest way to avoid impacting existing riparian areas in the South Section, and there are important riparian corridors that the recommended alternative parallels or would have to cross, is to choose co-location. In the South Section this alternative only adds up to 120 feet of right of way along a six mile stretch of existing I-10 in downtown Tucson. Riparian impacts have already been dealt with, for better or worse, in this area.</p>
O-49-13	<p>This practicable alternative should be chosen if direction from Executive Order 11990 is to be followed, which is noted in the DEIS on page 3.12-2:</p> <p>“Each agency shall provide leadership and shall take action to minimize the destruction, loss or degradation of wetlands, and to preserve and enhance the natural and beneficial values of wetlands in carrying out the agency's responsibilities” and, per the National Environmental Policy Act of 1969 (NEPA), “shall avoid undertaking or providing assistance for new construction located in wetlands unless the head of the agency finds (1) that there is no practicable alternative to such construction, and (2) that the proposed action includes all practicable measures to minimize harm to wetlands which may result from such use.” (42 FR 26961)</p> <p>With such explicit direction, the FHWA seems compelled to select co-locating I-11 along I-19 and I-10 from Sahuarita to Casa Grande as part of the preferred alternative, which is what NPCA recommends.</p> <p><u>Flood prone areas</u></p> <p>Like riparian areas, the simplest way to avoid impacting flood prone areas, of which there are significant amounts along the recommended alternative in Avra Valley, is to choose co-locating I-11 with I-19 and I-10 from Sahuarita to Casa Grande.</p> <p>From page 3.12-2: Executive Order 11988: Floodplain management requires federal agencies “to avoid, to the extent possible, the long- and short-term adverse impacts associated with the occupancy and modification of floodplains, and to avoid direct and indirect support of floodplain development wherever there is a practicable alternative” (42 FR 26951)</p> <p>The co-location of I-11 along I-19 and I-10 from Sahuarita to Casa Grande is a practicable route, and so should be selected as NPCA recommends.</p>

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O-49-12	Biologic Resources	GlobalTopic_1
O-49-13	Water Resources	GlobalTopic_1 and WR-4

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O-49-14	<p><u>Endangered wildlife and species of concern</u> The DEIS does a fairly good job of listing the species that would be impacted by build alternatives, though it should be augmented by the species list provided by the Coalition for Sonoran Desert Protection July 2019 comments to the DEIS. Specifically, the Tucson shovel-nosed snake needs to be looked at closer as the recommended alternative route would have dire consequences on this snake both through road strikes and habitat fragmentation.</p> <p>The recommended alternative route through Avra Valley would have much greater impact to endangered and other species of concerns, another reason that NPCA co-locating I-11 with I-19 and I-10 from Sahuarita to Casa Grande.</p>
O-49-15	<p><u>U.S.-Mexico border issues</u> For a proposed freeway whose purpose is to improve commercial traffic between the United States, Canada, and Mexico, there is very little in this document about trade relations and other issues between the U.S. and Mexico. An additional route designed to provide for more traffic would certainly be impacted by and also affect these issues. The DEIS should address how each alternative would affect or be affected by border wall construction, port of entry operations, trade tariffs, efforts to stop drug and human trafficking originating in Mexico, and concerns about terrorists entering the United States.</p> <p>Some of these concerns at first might seem far-fetched, but in the past so did having a permanent Border Patrol security checkpoint on Interstate 19 (which reduces travel time of all traffic going north). They should at least be considered. For instance, if the recommended alternative is built, then how would that affect Border Patrol and other law enforcement operations in Avra Valley, efforts that work to interdict drug traffic and stop illegal immigration which we know currently travels in this area. How often would temporary checkpoints be utilized in Avra Valley, or would a permanent checkpoint be considered? Would faster travel time and additional traffic afforded by an Avra Valley freeway create more illegal activity in protected areas like Saguaro National Park and Ironwood Forest National Monument?</p>
O-49-16	<p><u>Timeline and Implementation</u> Implementation, which could be incremental if the co-location alternative is selected is not even mentioned in this DEIS. Co-location offers an incredible advantage as far as every additional improvement could be helpful. In contrast, any Avra Valley freeway would have to be completely constructed from one end to the other before it could be of use to commercial traffic.</p> <p>The timeline used in this DEIS needs to be updated. It is assumed in the DEIS that the freeway would be constructed in five years, from 2020 through 2024. We know that promised wildlife studies for TMC mitigation and the Tier 2 EIS process going forward will take at least three years from when the ROD on this DEIS is released, which we have been told would be middle of next year. As projected traffic need is based on the extension of local five-year plans and population</p>

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O-49-14	Biologic Resources	GlobalTopic_1 and BR-4
O-49-15	Economics	GlobalTopic_3 and PN-1
O-49-16	Recommended Alternative	GlobalTopic_1 and GlobalTopic_8

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O-49-16 projections, we ask that all this information be updated and compared to revised timelines in the Final Tier 1 EIS.
The preceding review of impacts, from visual to implementation, shows that the DEIS fails to adequately evaluate the project’s direct, cumulative, and secondary effects under NEPA.

The draft preliminary Section 4(f) analysis fails to demonstrate that there is no feasible or prudent alternative to avoid impacts to the Bureau of Reclamation’s Tucson Mitigation Corridor

NPCA contends that the draft preliminary Section 4(f) evaluation that was issued as an Errata to the DEIS is incomplete and flawed. It also comes to the opposite and wrong conclusion of much of the public input the team has received.

It concludes that it is impossible to avoid or mitigate impacts to seven small protected properties along I-10 in Tucson from right of way expansion of no more than 120 feet at some points along a six mile stretch through downtown, despite not doing the site-specific project level analysis to show this. Based on this unsubstantiated conclusion, the evaluation tries unsuccessfully to show that bisecting a Section 4(f) property in Avra Valley as part of 43 miles of new freeway, can be mitigated.

O-49-17 The Section 4(f) analysis fails to demonstrate that there are not feasible or prudent alternatives to the Avra Valley alternatives that would impact TMC, such as co-location. It also fails to adequately consider the impact on Saguaro National Park and other Section 4(f) properties and other protected properties in Avra Valley.

NPCA asks that this evaluation be redone to correct its flaws and provide a fair comparison between unavoidable impacts to the Tucson Mitigation Corridor and impacts to the two small parks, one yet-to-be completed urban trail, three historic districts and one historic building if the co-location alternative is chosen.

The Section 4(f) section does not show that a “net benefit” could be achieved for the TMC 4(f) property, to make up for building a freeway through it. The DEIS provides no information on the actual impacts that might be inflicted on the TMC, and very few specifics on the mitigation. It does not include information about the baseline conditions for wildlife and wildlife travel through the TMC. Without this information there is no way for the reviewer to understand what a “net benefit” means in this context. Because a net benefit determination is controversial and probably inappropriate, it is imperative that the DEIS provide actual information regarding potential impacts, such as what is provided for other potentially impacted 4(f) properties.

From the beginning, NPCA has argued and many have pointed out during the public involvement process that there is no way to achieve a net benefit to wildlife connectivity in the Avra Valley (the purpose of the TMC) when the plan is to put a freeway through this important mitigation area. The freeway and its impacts to wildlife movement extend north and south from

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O-49-17	Section 4(f)	<p>GlobalTopic_1, GlobalTopic_11</p> <p>In accordance with 23 CFR 774.3(2)(c), if the determination is made that there is no feasible and prudent avoidance alternative, FHWA may approve only the alternative that causes the least overall harm in light of the preservation purpose of Section 4(f). ADOT will undertake a least overall harm analysis during Tier 2 studies. At that time, more detailed study of each Section 4(f) property and the potential for impacts to such properties will be completed. ADOT will develop and evaluate roadway alignments at a project-level with the goals of avoiding or minimizing impacts on the natural and built environment, including Section 4(f) properties.</p> <p>During Tier 2, ADOT will examine the Preferred Alternative west and east options in detail and will coordinate with the officials with jurisdiction over potentially affected Section 4(f) properties during the studies and development of appropriate mitigation measures. These studies and coordination activities will enable completion of a Final Section 4(f) Evaluation that compares the relative impacts and mitigation effectiveness of the options prior to selection of the option with the least overall harm."</p>
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the TMC, impacting wildlife migration throughout Avra Valley. There is no possibility that offsite mitigation land could replace wildlife routes east and west when a freeway will bisect the entire valley and block off every route except where wildlife crossings over or under the freeway are provided.

To even begin the conversation that “net benefit” can be used to breach the TMC, the 4(f) analysis must make the inaccurate claim that the Orange Alternative is not an avoidance alternative because it would impact more Section 4(f) properties. The creation of the three build alternatives from the various segments studied seems a little arbitrary. A hybrid from among them might be the best solution, as long as that hybrid includes co-location from Sahuarita to Casa Grande. Farther north, for instance, the Orange Alternative could instead include segments that avoid going through the Sonoran Desert National Monument, another Section 4(f) property, further minimizing impacts to 4(f) properties. Thus, a better preferred alternative could possibly be created by combining the Orange route from Nogales to Casa Grande, and the Purple route for the rest of the way north.

The Green and Purple Alternatives cannot be an avoidance alternative because they would inevitably impact a more significant Section 4(f) property. It is easy to see how to achieve “net benefit” from the I-10 4(f) properties. We believe that with more detailed Tier 2 analysis, along with innovative planning that has been advocated from involved members of the Tucson community, the purpose and needs of I-11 can be achieved by the co-location through Tucson without needing much mitigation of the affected properties.

This was the conclusion that NPCA and others from your stakeholder process presented to you in an August 3, 2018, position paper. This paper was inexplicitly omitted from the original DEIS and in its place the cover email alone was included in the public comment appendix. In the table that summarizes public comments, it was listed as neutral, when in fact it supported co-location of I-11 with I-19 and I-10 and suggested some improvements be incorporated into its planning. Classifying all the comments as positive, negative, or neutral is somewhat of a simplistic and inaccurate way to describe them in the DEIS.

After the three facilitated stakeholder meetings and our requests that both stakeholder groups be allowed during the last meeting to meet as one group was denied, most of the active stakeholders met together several times to develop this proposal. This proposal would be a much more accurate representation of what came out of the stakeholder process than the few paragraphs at pages 4-84 and 4-85. Your 4(f) analysis states, “Stakeholders from the Avra Valley stakeholder group meetings proposed different strategies to mitigate these concerns, including co-locating with the CAP Canal.” I was in that group and I would not summarize the mitigation we proposed as co-location with the CAP; while it is possible that one person said that it seems more likely that this mitigation possibility is something the agencies came up with. The stakeholder process did produce a consensus recommendation, which is available in the Errata document in the back section without page numbers, identified as Reference #998. The fact that it was originally mis-identified as neutral, and despite being available to the study team for

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almost a year now, perhaps explains why the “qualitative” review of 4(f) fails to take into account its suggestions.

As a busy, well-used interstate freeway I-10 will continue to need improvements. Our hope is that co-locating I-11 along I-10 will not only achieve the purposes of the I-11, but will also allow us to adapt the existing freeway into a 21st-century transportation system that will avoid impacts to historic structures and communities (and thus all the section 4(f) properties and more), be less costly, and have fewer environmental impacts. This is a vision first put forth in *I-11 Supercorridor: a next generation infrastructure case study*, a 2014 publication prepared by students and faculty at the University of Nevada, Arizona State University, and University of Arizona, and reflects the community values that are inherent in resolutions against an Avra Valley freeway by both the Pima County Board of Supervisors and the City of Tucson.

All three build alternatives contain 4(f) properties, so the prescribed step is to do a Least Harm Analysis, which is attempted in section 4.6. The required analysis factors demonstrate why the Least harm Analysis falls short for the Sahuarita to Casa Grande alternatives:

Least Harm Analysis Factor 1 – Ability to mitigate adverse impacts on each Section 4(f) property.

When considering this factor, the list of potential strategies to mitigate and minimize impacts of Section 4(f) properties in downtown Tucson that are given on page 4-76 should be carefully considered. The innovative ways provided in the Stakeholder’s Position Paper that could reduce the need for the maximum number of lanes to meet transportation needs should be added. The DEIS list includes measures such as replacement of land, design modifications, restoration, preservation of impacted historic buildings, and compensation – standard means of mitigation for transportation projects. However, on p. 4-96 it states, “There is a low ability to mitigate the impacts of the Orange Alternative.” The summary on page 4-108 goes farther and states, “After careful consideration, FHWA and ADOT determined Orange Alternative impacts are unmitigatable...” Leaving aside the fact that these statements are clearly contradictory to one another, the document provides no meaningful information to support these declaratory statements. The DEIS fails to adequately identify and assess opportunities for mitigation under NEPA here and for all the impacts of concern to NPCA as described elsewhere in these comments.

Least harm analysis Factor 2: Relative severity of the remaining harm, after mitigation. The DEIS states on page 4-96: “As indicated in Table 4-7 (Summary of Potential Section 4(f) Uses by Build Corridor Alternative) and described for Factor 1, FHWA and ADOT will be required to provide specific mitigation in order to achieve the potential types of uses presented in the table. **By achieving the programmatic net benefit finding, the Purple, Green, and Recommended Alternatives would substantially reduce and possibly eliminate remaining harm to the TMC property.**” [emphasis added] This debatable declarative statement is not consistent with the need for future wildlife studies before the potential mitigation can even be evaluated for its ability to achieve net benefit, and flies in the face of agency and expert comment that putting a freeway through the TMC cannot adequately be mitigated.

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Least harm analysis Factor 3: Relative significance of each Section 4(f) property.

“FHWA considers each Section 4(f) property to be equally significant in this evaluation; none of the properties has been determined through this evaluation or through coordination with officials with jurisdiction to be of different value.” The agencies fail to assess relative significance of each property as required under 4(f) policies, Least Harm Analysis (23 CFR 774.3(2)(c)). The agencies ignore relative importance assessment and instead just assume all are equal when that is not the case. The TMC is not equal in value to part of the parking lot at the rear of the Manning House (which is the only part of this historic property required for I-10 expansion). This is not to say that protecting historic properties and community parks are not important. But they can be mitigated much like historic properties and community parks have been avoided or mitigated for highway projects across the country, and recently in Tucson during expansions for Broadway and Grant Roads.

We take issue with your conclusion that the Ironwood Forest National Monument is not a Section(f) property. While it does not have “park” or “wildlife refuge” in its name, it is a significant protected public property that serves both functions. It is popular for outdoor recreational pursuits, including hiking, camping, picnicking, photography, enjoyment of cultural and historical sites, etc. It provides habitat for wildlife, including protected species (including plants) and animals like deer and bighorn sheep which are known to migrate to Saguaro National Park, and is managed for the protection of this wildlife – so it does provide a refuge. The federal agency that manages it has recommended against routing I-11 in Avra Valley as a freeway so situated would impact recreational access and have other impacts. Leaving this monument out of Section 4(f) analysis shows the analysis is inadequate.

Least Harm Analysis Factor 4: Views of the officials with jurisdiction over each Section 4(f) property.

It is proper that the expert opinion and concerns of the State Historic Preservation Office provide information that informs the 4(f) analysis and DEIS, but the views of elected officials must also be taken into account. The City of Tucson and Pima County are on the record (see elsewhere in this comment) that least harm will occur if I-11 is co-located along I-10 through Tucson compared to any alternative in the Avra Valley.

Least Harm Analysis Factor 5: Degree to which each alternative meets the purpose and need for the project.

We can assume that all the build alternatives being reviewed by this DEIS meet the broad purposes and need of I-11. The differences are relatively miniscule compared to the difference in cost (see Factor 7, below).

Least Harm Analysis Factor 6: The EIS fails to consider magnitude of adverse impacts on properties not protected by Section 4(f)

For Purple and Green Alternatives: This must include the Ironwood Forest National Monument (which, as we note above, should be a 4(f) property but since excluded as such should be included here) and the Tucson Mountain Wildlife Area.

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O-49-17 Least Harm Analysis Factor 7: Substantial differences in costs among the alternatives.
 Most of the capital cost difference between the Orange Alternative and the recommended alternative (\$4.5 billion according to Table 4-8) occurs in the South Section, the area of focus for most of the 4(f) discussion and the area of most interest to NPCA. If the future I-11 is co-located along I-19 and I-10 from Sahuarita to Casa Grande, the cost savings is \$3.4 billion.

It would be callous to say that the seven 4(f) properties of concern in downtown Tucson is worth the money saved by co-location. Instead, we would encourage that some small portion of this cost savings be used to do the innovative planning and work that the community is requesting of the agencies to produce a plan for this area that most effectively avoids and mitigates these properties.

It appears that the agencies have worked hard to try to establish a net-benefit mitigation for their recommended alternative, while not doing a similar effort for the properties in Tucson. Our conclusion is that the alternative with the least harm for the southern section is an alternative that co-locates along I-19 and I-10 from Sahuarita to Casa Grande, in contrast to the DEIS that incorrectly assumes a net benefit achievement for TMC mitigation at its core. We urge a complete and more unbiased reworking of the Draft Preliminary Section 4(f) Evaluation.

Miscellaneous errors in the Tier 1 DEIS

A few things we noted in reviewing this document:

- O-49-18** • Table 3.4-5 doesn't include Saguaro National Park, Tucson Mountain Park, and Ironwood Forest National Monument as recreational areas impacted by the Purple and Green routes.
- O-49-19** • On page 3.5-28 the DEIS states, "Throughout the scoping and outreach process, the Project Team received input from the members of the public in Pima County expressing opposition to the I-11 Corridor." This is not accurate. The majority of input was opposition to Segments C and D, or any new freeway through Avra Valley. Lumping public input in a binary "support or oppose" the entire I-11 Corridor is an inaccurate way to summarize this information.
- O-49-20** • Table 3.6-8 on page 3.6-18 is missing the year labels in the yellow rows.
- Indirect and cumulative effects are shown in tables to be the same (labelled "similar") in all build alternatives for Impacts and Beneficial Effects to Communities (Table 3.5-6), Economic Effects (Table 3.6-9).

O-49-18	Recreation	The indirect effects to the listed recreational properties are discussed generally in Table 3.4-5. The properties indirectly effected are not listed individually in the Table. Indirect effects will be assessed quantitatively as part of the Tier 2 studies.
O-49-19	NEPA	The document needs to be representative of all input received from the members of the public. Most comments regarding the Environmental Justice analysis suggested general opposition to the I-11 Corridor, or did not identify specific segments for which they were in opposition. In cases where specific areas were identified in general opposition comments, various locations along the I-11 Corridor were identified. A detailed discussion of impacts for each Build Corridor Alternative along individual segments is included in the analysis.
O-49-20	Economics	Table 3.6-8 in the Draft Tier 1 EIS was fixed and the Table 3.6-1 in the Final Tier 1 EIS is the new version. The use of the word "similar" in Table 3.5-6 and Table 3.6-9 in the Draft Tier 1 EIS is accurate.

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O-49-21

The Interstate 11 Tier 1 DEIS fails to adequately identify and assess viable alternatives to the preferred project

Conventional NEPA process would suggest that viable alternatives to the preferred recommendation be clearly identified and given a thorough assessment. We have already commented above that the selection of segments for the Orange Alternative north of Casa Grande could have varied to produce a better comparison for it to the preferred recommendation. The DEIS does an inadequate job of fairly assessing the recommended alternative to co-locating I-11 with I-19 and I-10 from Sahuarita to Casa Grande, as detailed in the next section of these comments. We believe that NEPA requires a much better explanation for the selection of a widely opposed recommended alternative over one that is cheaper in the order of billions of dollars, would be faster to implement, and has been shown to have many fewer environmental impacts.

A paragraph by paragraph review of DEIS 6.2.2 shows that by failing to adequately assess the alternatives the wrong decision was made in selecting the recommended alternative that would build a new freeway in Avra Valley

The important decision to recommend a new freeway in Avra Valley to serve as the I-11 segment between Sahuarita and Marana, completely bypassing Tucson, is explained in the DEIS on pages 6-6 through 6-9. Here is our review, with the DEIS being quoted in italics, and followed by NPCA’s response.

6.2.2. [first paragraph]: *One of the decision points for the Recommended Alternative is to pursue the use of existing facilities (Orange Alternative, Option B) or a new corridor (Purple and Green Alternatives, Options C or D) between Sahuarita and Marana in Pima County. The Recommended Alternative uses new corridor Option D (Green Alternative) between Sahuarita and Marana. The new corridor provides an alternate regional route to facilitate efficient mobility for emergency evacuation and defense access compared to the congested I-19/I-10 corridor through Tucson. Option D is part of the end-to-end alternative that reduces travel time for long-distance traffic between Nogales and Wickenburg and achieves LOS C or better throughout the I-11 Corridor. It will serve planned growth areas and key economic centers as well as attract and divert traffic, including trucks, from existing roadways. The Orange Alternative would serve a higher number of economic activity centers.*

Comments on 6.2.2. first paragraph

The purpose and need item that promotes I-11 to provide emergency evacuation and better defense travel, a leftover from Eisenhower era freeway building, is by its very nature biased toward new freeway segments rather than using existing infrastructure. But it should be required for this argument to be justified in its application to specific situations such as this segment of I-11. Evacuation from a catastrophic emergency from Palo Verde Nuclear Station, located west of Buckeye, has been mentioned as an evacuation need. But there is no evidence that state authorities in charge of such an evacuation have planned for this area at all. In fact,

O-49-21	Recommended Alternative	GlobalTopic_1, GlobalTopic_8 and GlobalTopic_11
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the Arizona Emergency Information Network, a project of the Arizona Department of Emergency and Military Affairs, has plans for 10-mile and 50-mile evacuation planning zones, both far from this segment of I-11.⁶ One would think that a freeway to be built near Tucson would be situated to actually help evacuation of the citizens of Tucson, but this segment's north south route to the west of where most people in Pima County live, rules it out as an emergency route. As for it being important for defense mobilization, it seems like our armed forces are doing just fine with their travels needs without having to go north and south through Avra Valley.

It is likely that anyone traveling from Nogales, or even Tubac, Amado, or parts of Sahuarita (none of which are very populated towns), north to the western part of Maricopa county or eventually Wickenburg, would be able to save a few minutes of their travel time. Truck drivers from Nogales and Mexico might also take this alignment if their destination is further north. This is perhaps the only real advantage of the Purple, Green, and Recommended alternatives in this segment, an advantage for a few at a very high cost that will be borne by all American taxpayers.

An alternative that is co-located with I-19 and I-10 would not only serve more economic activity centers, it would serve the city of Tucson. This is the second largest city in Arizona, and is where most southern Arizona travelers reside and work, very few of whom would benefit from an Avra Valley freeway.

6.2.2. [second paragraph]: *All of the Build Corridor Alternatives considered in this Draft Tier 1 EIS would result in adverse impacts, so potential mitigation strategies were considered in identifying the recommendation for this Draft Tier 1 EIS. While use of existing corridors would minimize new disturbances to environmental resources, all of the Build Corridor Alternatives would still require additional capacity on I-10 to accommodate the I-11 facility. This would result in unmitigable impacts on historic districts, archaeological resources, and the communities in Downtown Tucson.*

This has not been shown to be true. I-10 elsewhere in Tucson has recently been expanded, and important archaeological resources found there were carefully dealt with. The potential impact to historic districts and a couple of Section 4(f) parks would occur when (or if) six miles of I-10 from I-19 interchange to Prince Road needed for potential additional lanes add up to 120 feet of right of way. That is less than 88 acres of land that **might** be needed (how much could be avoided is not certain until Tier 2 level analysis is undertaken). Stakeholders have urged that innovative methods of reducing traffic load at peak times on I-10 could be used to reduce the need for the maximum expansion that this DEIS projects being needed. Others have argued that the population and traffic growth models used to determine the need within the project timeline should be looked at more closely and with more up-to-date information.

⁶ <https://ein.az.gov/hazards/palo-verde-generating-station-pvgs>

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6.2.2. [third paragraph]: *The new Corridor Options provide an alternate route for emergency and incident management, but would further fragment wildlife habitat and impact the endangered Pima pineapple cactus (PPC) (Coryphantha scheeri var. robustispina) and several other protected species. The Purple and Green Alternatives also are located closer to Tucson Mountain Park, the Tucson Mitigation Corridor (TMC), and Saguaro National Park (SNP) –West and designated wilderness within the park). A new interstate in this area would result in varying degrees of change in noise, light, air quality, and visual character for SNP-West, Tucson Mountain Park, and the TMC. After careful consideration, FHWA and ADOT determined Orange Alternative impacts are unmitigable, whereas impacts under the Purple and Green Alternatives could be mitigated. This Draft Tier 1 EIS identifies effective mitigation strategies to avoid, minimize, and mitigate these impacts, and if a Build Corridor Alternative is selected, it will be included in the ROD for the Tier 1 EIS. As future projects move I-11 forward into more detailed design, those efforts would continue in a more detailed manner when the specific alignment of I-11 is developed.*

The new freeway in Avra Valley would be a place for emergency and incident management, but not for problems facing Tucson. It would be a place where first responders would have to gear up to take care of the sorts of accidents and incidents that occur on freeways everywhere, adding to the burden of those agencies in this rural part of Pima County. The “careful consideration” has identified potential mitigation strategies by listing possible actions, but the needed baseline information and actual plans for mitigation so that they can be reviewed and commented upon are missing with the excuse that this is just a Tier 1 analysis, and there is no specific alignment to mitigate. Land managing agencies, expert commenters, and NPCA do not believe that mitigation is possible no matter where the alignment ends up being in the corridor, and therefore support co-locating the I-11 with I-19 and I-10 from Sahuarita to Casa Grande.

6.2.2. [fourth paragraph]: *Community Impacts: Option D would avoid impacts in downtown Tucson, but would impact the rural communities of Avra Valley and Picture Rocks. downtown Tucson is an urban area with a high concentration of low-income and minority individuals, and the Orange Alternative would impact these communities. The adverse effects on the low-income and minority populations in Tucson have the potential to exceed those borne by non-environmental justice populations. By contrast, demographic data indicate that Avra Valley and Picture Rocks communities do not contain low-income or minority populations. While Option D is located in close proximity to the Tohono O’odham Nation, it is not located on Tribal land and would not require any relocations or displacements on Tribal land. Section 3.5 (Communities, Community Resources, and Environmental Justice) provides more detail on the effects to communities and environmental justice populations.*

It is recognized that the construction of I-10 through low-income and minority communities in Tucson are a historical example of those with privilege taking advantage of those without. The combined stakeholder group has made the point that co-locating the I-11 along I-10 through downtown Tucson could provide the opportunity to make up for these past injustices by providing transportation and other amenities to these communities. There may need to be some slight expansion of right of way (or maybe not), but the impact to communities is

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nowhere near as severe as the original impact of I-10 construction – or the impact of new construction of a freeway in Avra Valley to those disadvantaged residents who live in Avra Valley. The demographic data is misinterpreted in this paragraph. There are certainly minority populations in Avra Valley and low-income residents – just in a smaller percentage than in downtown Tucson. But compare the impact of adding a few lanes to an existing freeway to building a freeway where your home once was. Multiply that by all the Avra Valley residents to be displaced, and add in everyone else who will be impacted by living next to a new freeway. Even if the percentage of minority and low-income persons is lower than in downtown Tucson, the actual number of disadvantaged people impacted will be larger. This is speculative, of course, because Tier 1 has not done a quantitative review of these sorts of impacts.

6.2.2. [fifth paragraph]: *Historic Districts and Archaeological Resources: Option D through the Avra Valley area generally has a low potential for direct impacts on archaeological sites, historic structures, and historic districts and buildings; however, there are a few spot locations that have a moderate potential for direct impacts. Based on known surveys, Option B in Downtown Tucson has a high potential for direct impacts on archeological sites and historic districts and buildings due to the greater density of historic properties in downtown Tucson, and there are a few spot locations with low to moderate potential. FHWA anticipates, and the State Historic Preservation Office concurs, that the Orange Alternative would result in findings of adverse effect under Section 106 for multiple historic properties in downtown Tucson. These adverse effects would be unmitigable. Section 3.7 (Cultural Resources) provides more detail on the assessment of the potential to affect cultural resources.*

O-49-21

Again, while we prefer that innovative designs in downtown Tucson avoid or minimize these impacts by making fewer added lanes necessary, it is not true that this sort of impact cannot be mitigated. In fact, the DEIS lists a number of potential strategies for mitigating this impact. Tucsonans know from recent non-freeway road projects (Grant and Broadway Roads widening) that historic properties can be mitigated for transportation projects.

6.2.2. [sixth and seven paragraphs]: *Economic Development Benefits: The connection of Option D with I-19 in the Sahuarita area would serve key southern Arizona economic activity centers. This connection would serve the aerospace, defense, manufacturing, and logistics industries in the region’s two largest employment areas: Tucson International Airport and the University of Arizona Tech Park. Both are located within the Sonoran Corridor economic development zone. This zone, which stretches from I-19 to I-10 south of the Tucson metropolitan core, is expected to continue to evolve into a dense cluster of industrial uses. In past studies, ADOT identified this zone as a major freight focus area. As an import center, this is where products entering the country from Mexico are prepared for inland distribution. As freight-related industries continue to locate here, the volume of truck traffic leaving the area for points east or west on I-10 will continue to grow. Option D may attract some freight traffic to the new corridor, possibly improving travel time reliability due to less daily congestion.*

Option D also offers an opportunity for the Sonoran Corridor transportation study to evaluate alternatives that connect to an I-11 Build Corridor Alternative. The Sonoran Corridor is currently

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under analysis in a separate Tier 1 EIS study effort and is looking at alternatives that provide a high-capacity transportation facility connecting I-19 and I-10 through this economic activity area. A seamless connection of the Sonoran Corridor and I-11 would enhance regional mobility and the functionality of both transportation facilities. Option D is consistent with some of the Sonoran Corridor alternatives still under development. The Sonoran Corridor Tier 1 EIS is considering the I-11 connection as part of its process.

We believe it is important that economic benefits of a project are paired with the cost so that a reviewer looks at benefit-cost equation. The recommended segment here is projected in this DEIS to cost \$3.4 billion **more** than co-location (which achieves basically the same good). Improvement of I-19 and I-10 also serves Sahuarita area economic development, the Tucson International Airport, and the University of Arizona Tech park. It would also not be the next part of a bypass that is fed by the proposed Sonoran Corridor. Both the City of Tucson and Pima County elected bodies have opposed any bypass freeway, preferring that economic activity within the city, and not at its far edges, be encouraged.

It is instructive to read carefully the weasel words (“may attract” and “possibly improving”) in the last sentence of the sixth paragraph, which shows that the claim that the recommended alternative would reduce congestion on the I-10 is unsubstantiated in this DEIS, and is no more than a hopeful guess used to justify the construction of a new bypass freeway.

O-49-21

6.2.2. [eighth paragraph]: *Separation from Tribal Lands: Compared to Option B and Option C, Option D provides the largest separation between I-11 and Tribal lands. The need for I-11 to stay off Tribal lands is a key theme in the input from Tribal stakeholders, who have expressed a preference for Build Corridor Alternatives that stay as far as possible away from Tribal lands. Chapter 5 (Coordination and Outreach) documents Tribal input in more detail. Option B along I-19 extends through a permanent transportation easement within the San Xavier District of the Tohono O’odham Nation (see Appendix I (I-19 through San Xavier [Tohono O’odham Nation])). Option C of the Purple Alternative is located along the western boundary of the San Xavier District, putting I-11 immediately adjacent to Tribal lands. The Central Arizona Project (CAP) Design Option would provide a greater separation from the Schuk Toak District of the Tohono O’odham Nation than the original alignments of Options C and D along Sandario Road.*

The Tohono O’odham have not asked that the permanent ROW through San Xavier be changed, so it unfair to characterize Option D as providing the largest separation from tribal lands. The Purple, Green, and Recommended alternatives all impact tribal land by being close to the Garcia Strip, and they also traverse traditional O’odham land. The co-location of I-11 with I-19 and I-10 from Sahuarita to Casa Grande has the least impact to actual tribal concerns.

6.2.2. [ninth, tenth, and eleventh paragraphs]: *Section 4(f) Analysis – Tucson Mitigation Corridor: The purpose and function of the TMC is protection of wildlife movement. The TMC facilitates east-west wildlife movement between large habitat blocks to the east (SNP- West, Tucson Mountain Park) and west (Ironwood Forest National Monument). Option D would introduce a new linear facility onto the TMC. The Purple and Green Alternatives would directly*

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O-49-21

impact the TMC, which would be a permanent use under Section 4(f), and mitigation strategies to address the effects to wildlife connectivity will be incorporated into the Recommended Alternative. The mitigation strategies reflect and expand upon those outlined in input received from the Bureau of Reclamation (Reclamation), see Reclamation’s letter dated June 8, 2018, in Appendix F. FHWA and ADOT will continue coordination with Reclamation, with the goal of reaching a net benefit finding in which the existing function of the TMC is maintained and enhanced.

In order to design effective mitigation, studies to better understand wildlife movement needs in Avra Valley would be conducted. These studies will be developed and completed prior to the Tier 2 analysis to ensure adequate data are available for that process.

Section 4(f) Analysis – Downtown Tucson: Historic districts in downtown Tucson are partially or entirely within the 2,000-foot-wide Project Area for Option B, with buildings immediately abutting both sides of I-10. Option B will require construction of additional capacity on I-10, which will impact historic districts, historic structures, and parks. The adverse impacts to the historic districts and structures in downtown Tucson are unmitigable. The avoidance analysis considered alignment shifts and design changes (including an elevated structure and tunneling below I-10). No feasible and prudent avoidance alternative to the permanent use of these historic districts could be identified. See Chapter 4 (Preliminary Draft Section 4(f) Evaluation) for more detail on the Section 4(f) analysis.

We have commented above about the inadequacy of the Section 4(f) analysis, which shows clearly here. Net benefit has not been reached because mitigation to achieve has not been designed and awaits further wildlife studies. Once that fact is acknowledged, a Least Harm Analysis shows that it can be more easily and effectively achieved by an I-10 co-location design that avoids and reduces harm to the seven Section 4(f) properties there that might be impacted.

Recommended alternative route selection disregards the comments of the general public and elected officials

It is instructive that elected officials from three levels of government oppose the recommended alternative. It would also be useful to tally the number of comments to this DEIS, and those that came in during the prolonged scoping periods, as to who opposed, objected to, or expressed serious concerns about an Avra Valley route. Presenting them in tab form that lists negative, positive, or neutral as to the whole Interstate 11 obscures the real concern with the Avra Valley routing of the preferred alternative.

Congressman Grijalva, who represents most of the area of the Avra Valley preferred alternative, wrote on June 1, 2017:

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O-49-21

I am very concerned about options “C” and “D” on the South Section map, which goes through Avra Valley and close to Saguaro National Park, Ironwood Forest National Monument, as well as protected open space and wildlife corridors. This proposed route of the Interstate would bring in new developments, roads, traffic, and have a negative impact on darks skies, wilderness values, and quality of life for residents of that community. Residents of my district affected by this option have called my office expressing these same concerns. Pima County votes have consistently opposed opening up the far western areas of Pima County to development via this transportation corridor. At some point, our state officials must be responsive and support alternatives that provide economic opportunity in the existing metro region and not continue to promote routes that local voters have overwhelmingly opposed.

The Congressman reiterated these concerns in his comments submitted to this DEIS, adding:

Frankly, it troubles me that after two scoping periods and a stakeholder engagement process that resulted in widespread opposition to proceeding with any route through Avra Valley – and with serious concern expressed all along by cooperating land and wildlife managing agencies – your study has determined that the much more costly alternative with greater negative impacts and fewer benefits for Pima County is the preferred alternative.

The Pima County’s county resolution opposing any bypass freeway in Avra Valley was submitted to you by the two supervisors who represent the area where it would be built. Recently the City Council of Tucson voted unanimously to oppose it.

NPCA joins these elected officials and the majority of public commenters in opposing your selection of a preferred alternative that includes the controversial and impactful Avra Valley route, and ask that it be changed so that I-11 is co-located along I-19 and I-10 from Sahuarita to Casa Grande.

Thank you for this opportunity to comment on the Tier 1 DEIS.

Sincerely,

Kevin Dahl
 Arizona Senior Program Manager
 National Parks Conservation Association
 738 N. Fifth Ave. Suite 222
 Tucson, AZ 85705
kdahl@npca.org
 (520) 603-6430

ID	Comment Document
	Tucson Public Hearing, May 8, 2019

1 The following comments were made for the
 2 record by members of the public:

3
 4 KEVIN DAHL:

5 Hi, panelists, CT, court reporter, audience.
 6 I'm Kevin Dahl, senior Arizona program manager for
 7 National Parks Conversation Association, a nonprofit
 8 group that for 100 years has been the leading voice
 9 for America's national parks. We have more than 1.3
 10 members and supporters. I'm here because we have
 11 strong, strong concerns of the preferred alternative
 12 for I-11 will severely impact Saguaro National Park.

O-11-1

13 Placing a freeway route so close to Saguaro
 14 and to the Arizona-Sonora Desert Museum, kind of
 15 crazy, will subject visitors and the resources to air,
 16 light, noise and view shed pollution from the
 17 construction, use and the inevitable development that
 18 follows placement of freeways.

19 The development will also result in higher
 20 demand for use of the limited east-west roads that
 21 connect to Tucson to the Avra Valley. You're creating
 22 a transportation problem because there are really only
 23 two routes in the northern part of this area career,
 24 the scenic Gates Pass Road and the Painted Rock Road.
 25 Park manages and owns the Painted Rock Road, and that

O-11-2

ID	Topic	Response
O-11-1	Avra Valley	GlobalTopic_1, AQ-1, V-1, and N-1
O-11-2	Transportation	GlobalTopic_1 and GlobalTopic_8

ID	Comment Document
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1 was not addressed in the Stratton Environmental Impact
 2 Statement, much to my surprise.

3 This preferred alternative west of Tucson will
 4 completely disrupt wildlife corridors, isolating
 5 Saguaro and Tucson Mountain Parks. Your draft
 6 document makes the claim that this can be mitigated,
 7 and most of us think that that's just ridiculous. We
 8 will provide written comments from experts in this
 9 field that show you have not made the case at all in
 10 this area. You just can't say, We'll mitigate it,
 11 we'll put in 20 wildlife corridors. That won't work.

12 Likewise, the 4(f) evaluation is incomplete.
 13 It did not include Ironwood Forest National Monument.
 14 This community worked hard to protect that area. To
 15 think that you can place a freeway next to it, not
 16 considering the 4(f) implications, we've missed the
 17 mark.

18 We're concerned that the selected alternative
 19 routes seems very likely to be pre-decisional at this
 20 point. I say this from someone that's been involved
 21 in this scoping for three years. Take this, for
 22 example: The argument that this segment is better
 23 than improving existing freeways because it has better
 24 homeland security values, homeland defense.

25 One example is it provides evacuation route

O-11-2

O-11-3

O-11-6

O-11-1

O-11-5

ID	Topic	Response
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O-11-3	Biologic Resources	GlobalTopic_1 and BR-5
O-11-4	NA	No response needed
O-11-6	Section 4(f)	<p>The publicly owned portions of this property, which are managed by BLM, are accessible to the public. The property was designated in 2000 by Presidential Proclamation 7320 for the protection and management of "historic landmarks, historic and prehistoric structures, and other objects of historic or scientific interest." This formal designation serves as the definition of the primary purpose of the property as a whole. Within the BLM's Ironwood Forest National Monument, Record of Decision and Approved Resource Management Plan (BLM 2013), the agency states that other, secondary uses (recreation, timbering, and rangeland, for example) may be allowed under specific criteria so that the primary purpose of the property is supported. However, these other, secondary uses are not relevant to the Section 4(f) test of primary purpose.</p> <p>As explained in FHWA's 2012 Section 4(f) Policy Paper, Question 1A, to be protected under Section 4(f), land must be formally designated as a park, recreation area, wildlife and waterfowl refuge, or historic site (23 CFR 774.17). FHWA interprets formal designation as meaning that the land has been identified through an official process, such as a Presidential or legislative action, or is included in an adopted master plan by the official with jurisdiction over the property. As part of the formal designation, the primary purpose and function of the land is identified. Referring again to FHWA's 2012 Section 4(f) Policy Paper, Question 1A, primary purpose is related to the land's primary function and how it is intended to be managed. Incidental, secondary, occasional, or dispersed activities that are similar to park, recreational, or refuge activities do not constitute a primary purpose within the context of Section 4(f). Determining the primary purpose of land is also important because the criteria for assessing use of a Section 4(f) property differs depending on whether the land is formally designated as a park, recreation area, wildlife or waterfowl refuge, or historic site.</p> <p>On the basis of these Section 4(f) tests, FHWA assessed that, although IFNM contains publicly owned land that is open to the public, the primary purpose of the IFNM is not a park, recreation area, wildlife or waterfowl refuge, or historic site as defined by Section 4(f). Thus, FHWA preliminarily determined that IFNM is not protected under Section 4(f).</p>
O-11-5	Economics	GlobalTopic_4

ID	Comment Document
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ID	Topic	Response
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0-11-5

1 for Palo Verde Nuclear Generating Station, should an
 2 incident occur there. However, the comparison didn't
 3 include a cost comparison. The differential is \$3.4
 4 billion. So for the same amount of travel, it's going
 5 to cost \$3.4 billion to do that in a new freeway
 6 through this valley. That's a lot of money. We can
 7 shut down Palo Verde and get all of its users solar
 8 energy for free.

0-11-1

9 The incorrect conclusion that the impacts of
 10 existing of improvements to existing freeways cannot
 11 be mitigated. It is inadequately explored in this
 12 draft EIS. It's really just Tier I. We need Tier II
 13 to actually look at that, to see how it can be
 14 improved without severely impacting the historical and
 15 cultural values of the community along that freeway.
 16 And in fact, everybody in Tucson, the people who live
 17 by this freeway, are saying, Do it here, not out
 18 there. Thank you.

ID	Comment Document
	Marana Public Hearing, May 11, 2019

ID	Topic	Response
O-20-1	Avra Valley	GlobalTopic_1 and GlobalTopic_4 GlobalTopic_13

O-20-1

17 MR. KEVIN DAHL: I'm Kevin Dahl. I am
 18 Arizona's program manager for the National Parks &
 19 Conservation Association in Tucson. I'll read a statement
 20 for my organization. I'm reading a statement or a portion
 21 of it from the I-11 Joint Stakeholders Community Planning
 22 Group, which was submitted in the scoping process, and we
 23 think it's important to be heard for the hearing record
 24 here.
 25 At the invitation of the Arizona Department

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ID	Topic	Response
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O-20-1

1 of Transportation and the Federal Highway Administration,
 2 representatives of several stakeholder organizations
 3 recently participated -- this is last year -- in a process
 4 to explore two alternative routes for the proposed
 5 Interstate I-11 through Pima County.

6 The stakeholders were convened in two
 7 separate groups, corresponding to two alternatives being
 8 considered: One, a new bypass freeway through Avra
 9 Valley, and, two, expanding I-19/I-10 through the city
 10 center.

11 We appreciated being offered the opportunity
 12 to explore these routes and discuss the impacts and
 13 opportunities associated with each. As part of the
 14 federal NEPA scoping process, the two groups met
 15 separately in March and April for a total of nine hours.
 16 However, after the scoping meetings ended, members of both
 17 groups concluded that more meaningful input could be
 18 provided to the federal and state agencies if they
 19 continued to meet as a joint group to evaluate impacts and
 20 opportunities of both corridor alternatives. As such,
 21 members of these two stakeholder groups are now working
 22 together, and we have arrived at several important
 23 conclusions, which we highlight here.

24 The undersigned representatives of both
 25 groups of stakeholders have concluded that the expansion

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O-20-1

1 and reconfiguration of the existing I-10/I-19 corridor is
 2 the only acceptable route. A bypass through Avra Valley
 3 is not acceptable.

4 Any further consideration of the Avra Valley
 5 option must take into account not only the input from both
 6 stakeholder groups, but also the concerns of the Tohono
 7 O'odham Nation, whose land it impacts, and who were the
 8 original occupants of the entire valley.

9 There appear to be significant shortcomings
 10 associated with the federal review process that focuses on
 11 new highway construction. Nevertheless, we believe that
 12 there could be a significant opportunity to address some
 13 of the historic negative consequences that resulted from
 14 the construction of I-10, which physically divided our
 15 community and diminished the quality of life of our
 16 downtown and other neighborhoods along the highway.

O-20-2

17 Instead of simply adding new lanes to our
 18 existing highway, we should consider redesigning portions
 19 of it, either going underground or suspended, so that we
 20 can reconnect our city. Moreover, focusing on new highway
 21 construction overlooks other less costly options that
 22 would encourage the free flow of goods. These include
 23 changes to the management of the existing highway to
 24 reduce congestion, including pricing, scheduling and other
 25 programs; technologies that include traffic flows;

O-20-2	Transportation	GlobalTopic_1
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Page 6

O-20-2

1 enhancements to our rail system which exists in Avra
 2 Valley, including light rail and intermodal
 3 transportation; and other road improvements throughout
 4 Tucson that would divert traffic from I-10.

O-20-3

5 Assessing the cumulative impacts of these
 6 options on congestion should be considered before
 7 contemplating another bypass or extending I-10. In
 8 addition, the following studies must be completed, with
 9 the results communicated to the community stakeholders and
 10 incorporated into the decision process early on.

11 Thank you for this opportunity to be part of
 12 this.

O-20-3	Indirect and Cumulative	GlobalTopic_1 and IC-1
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ID	Comment Document
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June 11, 2019

The Honorable Elaine L. Chao
 Secretary of Transportation
 1200 New Jersey Ave, SE
 Washington, DC 20590

RE: I-11 Objections to Blue Route

Dear Madam Secretary:

As the educational board of Palo Verde Elementary School District, a school district that could be directly impacted by the construction of Interstate 11, we are voicing our strong objections to the Arizona Department of Transportation's and the Federal Highway Administration's preferred Blue corridor. We are concerned with the negative consequences that our school, students, and community would sustain if this route is designated, and we feel an alternative route would be more economically sound and safer for our children.

The preferred Blue route is shown to cut directly through thousands of acres of farmland and family homes. Besides dramatically decreasing our state's agricultural production, this route, then, has the potential to displace thousands of families and students in our community and in other rural communities near us.

The Blue route also shows the Interstate passing directly north of Palo Verde School. This raises serious concerns about the health and safety of our students. The EPA states that all those who live, work, or attend school near a major roadway – but especially children -- have an increased risk of serious conditions such as asthma, impaired lung development, cardiovascular disease, childhood leukemia, and even premature death. Choosing the Blue route, especially when other potential routes are available, would put our children at undue risk of great harm.

Recently, several studies have also been cited showing that students who move to areas higher in pollution exhibit a decline in test scores and an increase in both behavior problems and absenteeism. In the case of the Blue route currently preferred by the Department of Transportation, students would not be moving toward pollution; we would be moving the pollution to them! The majority of our students already qualify for free or reduced lunch – a criteria used by the Department of Education to flag at-risk students -- yet both they and our staff work tirelessly to meet state standards and outperform schools with similar low-income populations. When better options are available, why would the state choose to put our students at an even greater academic risk?

O-24-1

ID	Topic	Response
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O-24-1	Recommended Alternative	GlobalTopic_2, EJ-1 and AQ-1
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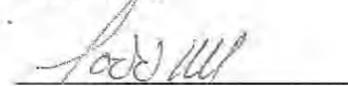
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O-24-2

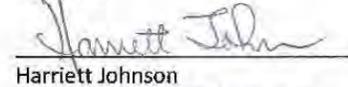
The proposed Blue route for the new Interstate 11 freeway would cost our community and our state too much economically. More importantly, it could cost our families, and especially our children, both physically and academically. In place of the Blue route, the alternative Orange route would save money, jobs, and stability, and it would ensure better health for our children and our community. The Orange route proposes that Interstate 11 follow existing freeways and highways instead of building new ones from scratch. Because the state would not have to build brand-new infrastructure, this has the potential to save millions of taxpayer dollars. Using the existing roadways indicated by the Orange route would also save countless family homes, eliminating the need for thousands to move and rebuild due to displacement. It would also prevent loss of income for family farmers and their workers, both of whom would lose homes and jobs were the proposed Blue route to be chosen. Finally, the alternative Orange route would stay many miles from our school campus, keeping our children safe and free from the potentially debilitating effects of roadway pollution. This will not happen with the Blue route.

We urge you to no longer consider the Blue route for Interstate 11 as a viable option. It is too costly and too damaging to our community and our children. Instead, please consider the Orange route as the preferred route.

Most sincerely,



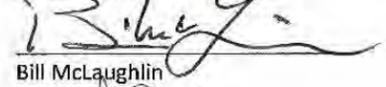
Todd Hall



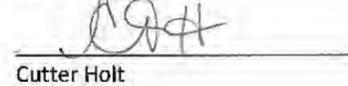
Harriett Johnson



Curtis Harris



Bill McLaughlin



Cutter Holt

<https://www.epa.gov/mobile-source-pollution/how-mobile-source-pollution-affects-your-health>
<https://www.citylab.com/environment/2019/02/air-pollution-kids-health-data-school-academic-test-scores/581929/>
<https://www.npr.org/2018/08/27/642321572/scientists-link-air-pollution-exposure-to-cognitive-decline>
<https://www.chalkbeat.org/posts/us/2019/02/25/pollution-harm-schools-research/>

ID	Topic	Response
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O-24-2	Orange Alternative	GlobalTopic_2
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Pinal County I-11 Coalition

O-5-1

On behalf of the Pinal County I-11 Coalition, please find the uploaded Resolution of Support and Exhibit A Map attachment in support of Option I2 (Barnes Road alignment) of the Recommended Alternative and restating support of Option I1 (Montgomery Road alignment).

ID	Topic	Response
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O-5-1	Support	GlobalResponse_4 The Preferred Alternative in the Final Tier 1 EIS was revised to co-locate with I-8 from the vicinity of Chuichu Road west to Montgomery Road then north along the Montgomery Road alignment to Option I2.
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ID Comment Document

RESOLUTION OF THE PINAL COUNTY I-11 COALITION DECLARING SUPPORT FOR THE FEDERAL HIGHWAY ADMINISTRATION AND ARIZONA DEPARTMENT OF TRANSPORTATION'S INTERSTATE 11 TIER 1 ENVIRONMENTAL IMPACT STATEMENT AND PRELIMINARY SECTION 4(F) EVALUATION.

WHEREAS, in November 2014, the Federal Highway Administration (FHWA), Arizona Department of Transportation (ADOT), Nevada Department of Transportation, Maricopa Association of Governments, Regional Transportation Commission of Southern Nevada, and other key stakeholders completed an initial two-year feasibility study known as the Interstate 11 (I-11) and Intermountain West Corridor Study; and,

WHEREAS, in May 2016, FHWA and ADOT issued a Notice of Intent to commence with a three year Tier 1 Environmental Impact Statement to select a corridor alternative for I-11 between Nogales and Wickenburg; and,

WHEREAS, the I-11 Corridor Study Area is 280 miles long and the environmental review process examines and evaluates the No Build Alternative and a 2,000-foot wide Project Area for three Build Corridor Alternatives in which the I-11 alignment could be located; and,

WHEREAS, the I-11 Corridor Study Area traverses the counties of Santa Cruz, Pima, Pinal, Maricopa, and Yavapai within central and southern Arizona; and,

WHEREAS, the Pinal County I-11 Coalition supports the environmental review process for the location of I-11 in accordance with the National Environmental Policy Act and other regulatory requirements; and,

WHEREAS, the Pinal County I-11 Coalition declares its support for Option I2 (Barnes Road alignment) of the recommended alternative in the Draft Tier 1 Environmental Impact Statement and Preliminary Section 4(f) Evaluation (Draft Tier 1 EIS) and Option I1 (Montgomery Road alignment) identified in the Alternative Selections Report dated December 2017 as they are consistent with the West Pinal Freeway programmed for right-of-way preservation in Phase II of the Pinal Regional Transportation Plan approved by Pinal County voters in 2017.

NOW THEREFORE, IT IS HEREBY RESOLVED that the Pinal County I-11 Coalition declares its support of the following:

- 1) The environmental review process for the location of I-11; and,
- 2) Option I2 (Barnes Road alignment) of the recommended alternative in the Draft Tier 1 EIS and Option I1 (Montgomery Road alignment) identified in the Alternative Selections Report dated December 2017 as these options are consistent with the West Pinal Freeway programmed for right-of-way preservation in Phase II of the Pinal Regional Transportation Plan approved by Pinal County voters in 2017; and,

- 3) Options I2 and I1 are in accordance with other local and county level plans and provide alternate, high capacity routes to serve planned growth and economic centers in western Pinal County while avoiding the planned development and expansion of the Lucid Motors and Tractor Supply Distribution Center in Casa Grande as depicted in Exhibit A; and,
- 4) Options I2 and I1 best meet the Purpose and Need of the Draft Tier 1 EIS as they promote freight movement, link communities, and strengthen economic development and job growth within Pinal County.

IT IS FURTHER RESOLVED that this Resolution is effective upon approval and execution of this Resolution.

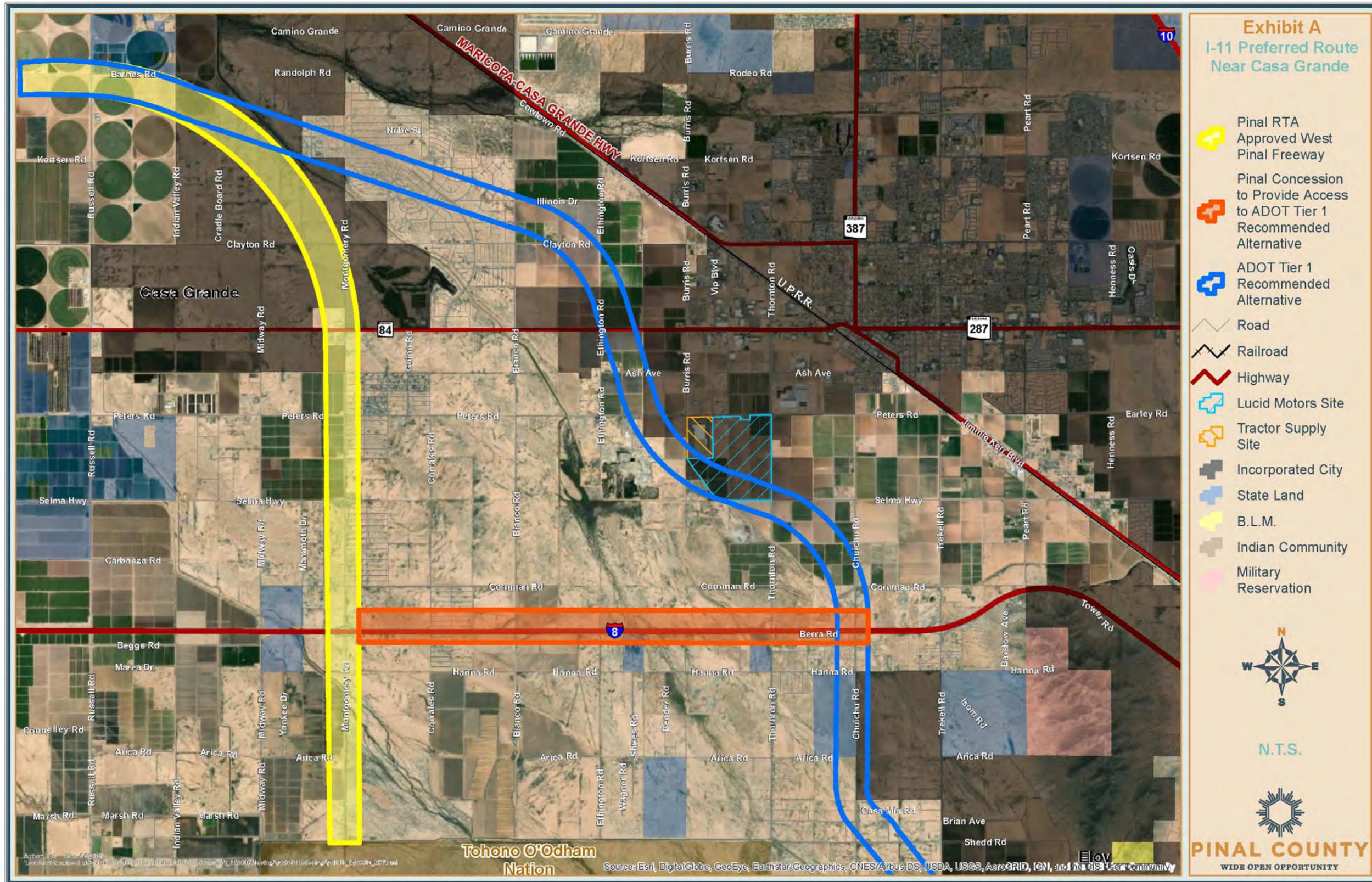
DATED this 13th day of May, 2019, by the PINAL COUNTY I-11 COALITION.


Anthony Smith, Chairman


Christian Price, Vice-Chairman

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Comment Document



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Pinal County I-11 Coalition

O-27-1

PLEASE NOTE THE REVISED RESOLUTION FROM THE PINAL COUNTY I-11 COALITION
 On behalf of the Pinal County I-11 Coalition, please find the uploaded, REVISED Resolution and map attachment.

ID	Topic	Response
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O-27-1	Support	GlobalTopic_4 The Preferred Alternative in the Final Tier 1 EIS was revised to co-locate with I-8 from the vicinity of Chuichu Road west to Montgomery Road then north along the Montgomery Road alignment to Option I2.
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ID Comment Document

RESOLUTION OF THE PINAL COUNTY I-11 COALITION DECLARING SUPPORT FOR THE FEDERAL HIGHWAY ADMINISTRATION AND ARIZONA DEPARTMENT OF TRANSPORTATION'S INTERSTATE 11 TIER 1 ENVIRONMENTAL IMPACT STATEMENT AND PRELIMINARY SECTION 4(F) EVALUATION.

WHEREAS, in November 2014, the Federal Highway Administration (FHWA), Arizona Department of Transportation (ADOT), Nevada Department of Transportation, Maricopa Association of Governments, Regional Transportation Commission of Southern Nevada, and other key stakeholders completed an initial two-year feasibility study known as the Interstate 11 (I-11) and Intermountain West Corridor Study; and,

WHEREAS, in May 2016, FHWA and ADOT issued a Notice of Intent to commence with a three year Tier 1 Environmental Impact Statement to select a corridor alternative for I-11 between Nogales and Wickenburg; and,

WHEREAS, the I-11 Corridor Study Area is 280 miles long and the environmental review process examines and evaluates the No Build Alternative and a 2,000-foot wide Project Area for three Build Corridor Alternatives in which the I-11 alignment could be located; and,

WHEREAS, the I-11 Corridor Study Area traverses the counties of Santa Cruz, Pima, Pinal, Maricopa, and Yavapai within central and southern Arizona; and,

WHEREAS, the Pinal County I-11 Coalition supports the environmental review process for the location of I-11 in accordance with the National Environmental Policy Act and other regulatory requirements; and,

WHEREAS, the Pinal County I-11 Coalition declares its support for Option I2 (Barnes Road alignment) of the recommended alternative in the Draft Tier 1 Environmental Impact Statement and Preliminary Section 4(f) Evaluation (Draft Tier 1 EIS) and Option I1 (Montgomery Road alignment) identified in the Alternative Selections Report dated December 2017 as they are consistent with the West Pinal Freeway programmed for right-of-way preservation in Phase II of the Pinal Regional Transportation Plan approved by Pinal County voters in 2017.

NOW THEREFORE, IT IS HEREBY RESOLVED that the Pinal County I-11 Coalition declares its support of the following:

- 1) The environmental review process for the location of I-11; and,
- 2) Option I2 (Barnes Road alignment) of the recommended alternative in the Draft Tier 1 EIS and Option I1 (Montgomery Road alignment) identified in the Alternative Selections Report dated December 2017 as these options are consistent with the West Pinal Freeway programmed for right-of-way preservation in Phase II of the Pinal Regional Transportation Plan approved by Pinal County voters in 2017; and,

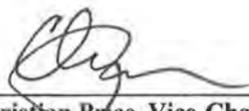
- 3) Options I2 and I1 are in accordance with other local and county level plans and provide alternate, high capacity routes to serve planned growth and economic centers in western Pinal County while avoiding the planned development and expansion of the Lucid Motors and Tractor Supply Distribution Center in Casa Grande as depicted in Exhibit A; and,
- 4) Options I2 and I1 best meet the Purpose and Need of the Draft Tier 1 EIS as they promote freight movement, link communities, and strengthen economic development and job growth within Pinal County.
- 5) Provided that caution is exercised so as to not negatively impact the existing Global Water multi-million dollar facility as it is essential to providing water utility service for the region.

IT IS FURTHER RESOLVED that this Resolution is effective upon approval and execution of this Resolution.

DATED this 13th day of June, 2019, by the PINAL COUNTY I-11 COALITION.



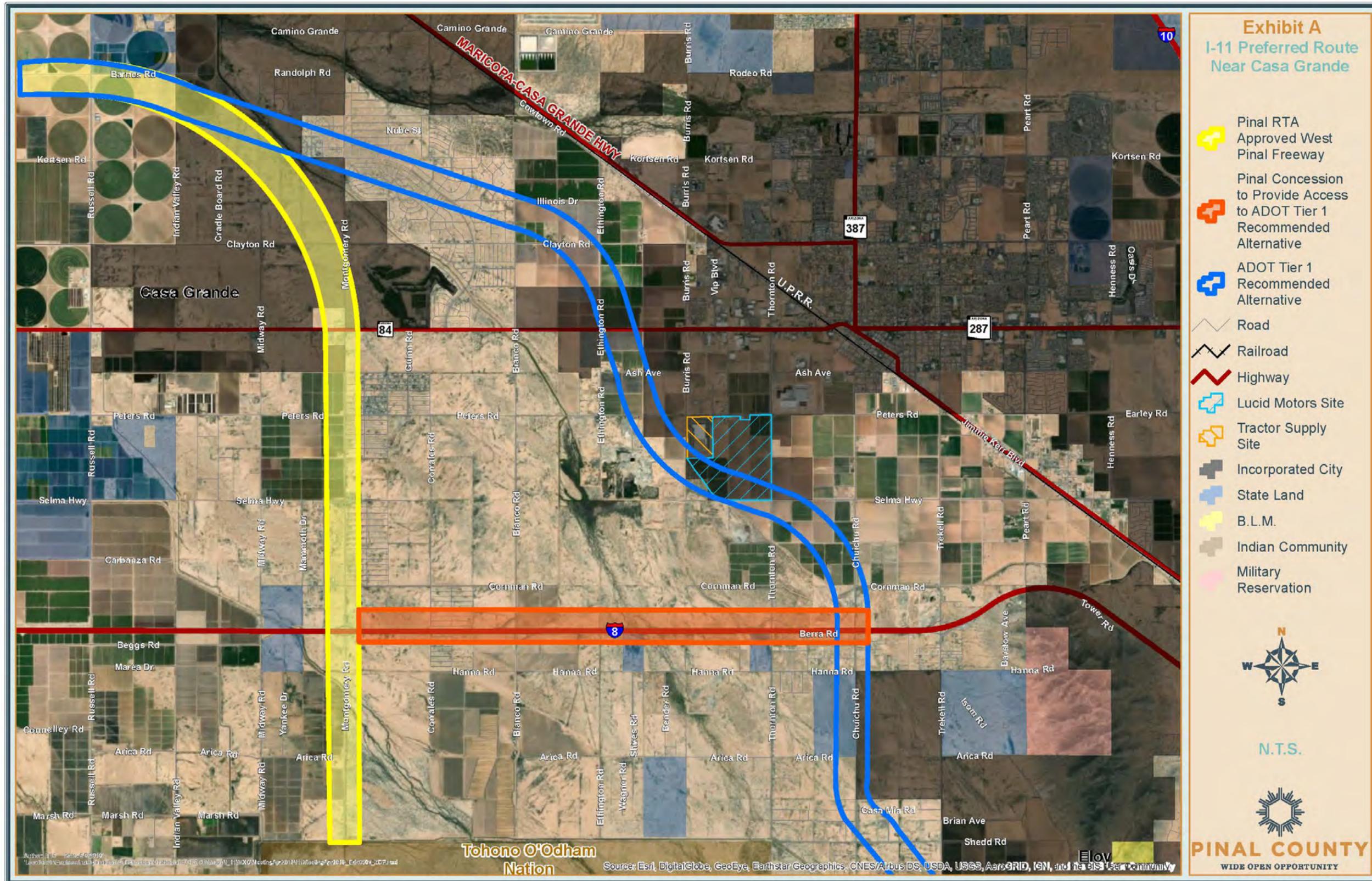
 Anthony Smith, Chairman



 Christian Price, Vice-Chairman

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Comment Document



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ID	Topic	Response
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O-36-1	General	GlobalTopic_4 and PN-3 and AQ-3 and N-1
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O-36-1

The Santa Cruz Valley Citizens Council (SCVCC), which represents more than 400 households in the northwest Santa Cruz County area, is taking this opportunity to comment on the I-11 Draft Tier 1 EIS and Preliminary Section 4(f) Evaluation – and to register its concerns about possible environmental impacts to our area.

Specifically, we hope that the following issues are fully addressed when the next iteration of the EIS is developed.

1. Increased auto and truck traffic and its impact on the communities along the I-19 corridor between Nogales and Amado.
2. Environmental air quality and noise abatement concerns due to increased backup of auto and truck traffic at the I-19 Border Patrol checkpoint near Exit 40. This will be particularly relevant should the I-19 corridor be widened. Also, if a parallel route is constructed, it can be expected – based, in part, on comments submitted in 2017 by the Border Patrol – that another BP checkpoint would be needed, further impacting the flow of traffic.
3. Detailed noise modeling will need to be conducted for the dense residential areas near Nogales, Rio Rico, Tubac, Green Valley and Tucson.
4. Concern that the traffic studies used as part of the EIS modeling are now outdated, which also impacts the existing projections out to the year 2040.
5. Noise mitigation efforts need to be better defined and mapped.

The geographic area covered by the SCVCC includes the communities of Tumacacori, Carmen, Tubac and Amado along Interstate 19 (east and west). Nearly 2,000 people live in our area including the homeowners associations and neighborhoods of the Palo Prado Estates, Empty Saddles Estates, Tubac Heights I and II, Cerro Pelon, Rusty Spur, Piedra Drive Subdivision, Tubac Vistas, Tubac Villas, Tubac Rio Cruz, TVCC Estates, Tubac Golf Resort residences, all HOAs within the TVCC Estates, Village of Tubac, Barrio de Tubac, Carmen, Tumacacori, Tubac Foothills, all HOAs and private owners within the boundaries east of the Santa Cruz River and East of I-19 (south of Clark's Crossing Rd.), Aliso Springs, the Ranch at Aliso Springs and all other private property owners west of I-19 and east of Coronado National Forest.

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ID	Topic	Response
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Grand Canyon Chapter • 514 W. Roosevelt St. • Phoenix, AZ 85003
 Phone: (602) 253-8633 • Email: grand.canyon.chapter@sierraclub.org

July 8, 2019

Interstate 11 Tier 1 EIS Study Team
 c/o ADOT Communications
 1655 W. Jackson St., Mail Drop 126F
 Phoenix, AZ 85007
 Sent via email: I-11ADOTStudy@hdrinc.com

Re: Comments on the Interstate 11 Tier 1 Draft Environmental Impact Statement, Nogales to Wickenburg

Dear Interstate 11 EIS Study Team:

Thank you for the opportunity to comment on the *Interstate 11 Tier 1 Draft Environmental Impact Statement, Nogales to Wickenburg*. Please accept these comments on behalf of Sierra Club’s Grand Canyon (Arizona) Chapter and our more than 60,000 members and supporters in Arizona.

O-51-1

Sierra Club’s mission is “to explore, enjoy, and protect the wild places of the earth; to practice and promote the responsible use of the earth’s ecosystems and resources; and to educate and enlist humanity to protect and restore the quality of the natural and human environments.” Sierra Club has long been committed to protecting public lands and public health and to ensuring that transportation and development accommodate ecological considerations. Our members have a significant interest in the proposed I-11 as many live in or use areas within and near these corridors and will be affected by the additional air pollution, destruction of wildlife habitat, significant noise, and other negative impacts of the proposed freeway and associated corridor.

Sierra Club opposes the proposed I-11 Freeway Corridor and the three “build” alternatives outlined in the Draft Environmental Impact Statement (DEIS) and remains concerned about the significant negative impacts of this proposed corridor, and strongly urges selection of a “no build” alternative. Note that a “no build” alternative need not be a “do nothing” alternative. The Arizona Department of Transportation (ADOT) could instead seriously consider and invest dollars in passenger rail transportation along the I-10 corridor and, as noted in the DEIS “Arizona freight rail corridors will have adequate rail capacity for the foreseeable future.” (DEIS at 2-11) In addition to these comments, Sierra Club supports and incorporates by reference the comments made by the Coalition for Sonoran Desert Protection et al. Sierra Club Grand Canyon Chapter is a co-signer on those comments.

O-51-2

Background

Our country annually invests more than \$200 billion of our taxes in transportation infrastructure, including freeways, bridges, airports, public transportation, and sidewalks associated with roads. In 2014, \$279 billion was spent on transportation infrastructure, 60 percent of which was allocated to

O-51-1	Alternatives	Thank you for your input and interest in the I-11 Corridor Tier 1 EIS. FHWA and ADOT value the feedback on the Draft Tier 1 EIS provided by your organization. GlobalTopic_4 and AC-9, LU-3
O-51-2	NEPA Process	GlobalTopic_4, GlobalTopic_10, AQ-2, PN-3, AC-7, and AC-9 Indirect and cumulative impacts were evaluated and documented in Chapter 3.17 of the Draft and Final Tier 1 EIS.



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O-51-2 highways.¹ These projects have by-and-large continued to promote our nation’s reliance on oil and gas and to exacerbate public health and safety issues and both directly and indirectly contribute to our climate crisis as most of our nation’s and Arizona’s greenhouse gas emissions come from vehicles².

The National Environmental Policy Act (NEPA) and the regulations promulgated to implement the act (42 U.S.C. § 4321, *et seq.*, 40 CFR § 1500.1, *et seq.*) mandate that the lead agency, the Federal Highway Administration (FHWA), assesses and evaluates the environmental impacts of the I-11 Corridor and that reasonable alternatives be considered (42 U.S.C. § 4332 102 C). NEPA requires the lead agency to “[r]igorously explore and objectively evaluate all reasonable alternatives,” including those that are “not within the jurisdiction of the lead agency” (40 CFR 1502.14(a) and (c)). The Study Area for the proposed I-11 was arbitrarily limited, as was the range of options, including the no-build option. FHWA must seriously consider addressing transportation issues via improving infrastructure outside the Study Area and how improved mass transit both in and outside the Study Area could improve transportation and reduce the need to construct new roadways. Further, it admits that rail freight capacity is adequate for the near future.

FHWA, as the lead agency for this project, must consider cumulative impacts as well as direct and indirect impacts of the proposed corridor. The potential impacts of this project are large and significant and are underestimated in the DEIS. As mandated by NEPA, the DEIS should have included all reasonable alternatives, an evaluation of those alternatives, and mitigation measures to minimize the disturbance and impact of the project. This DEIS does not include a transit/rail option and has missed many key impacts. As far as mitigation goes, it is clear that many of the impacts from this proposal simply cannot be mitigated.

The Recommended Alternative route identified in the DEIS would be destructive and have devastating and unmitigable impacts to public lands, wildlife, air quality, and human health.

Purpose and Need

We have expressed this previously but ask again that FHWA and the Arizona Department of Transportation (ADOT) evaluate and demonstrate the need for this corridor and why it is being proposed for these locations. Economics and congestion were the main factors considered in order to justify moving forward with this project. Although these are both important elements, many other issues should also be taken into account when justifying whether or not a project is needed and should proceed. Examples of other factors to consider include public needs and desires, environmental impacts, public health concerns, land use, and more. By only focusing on economics and congestion, the “justification” for this corridor is biased from the beginning and clearly swayed toward the need for it. If even one or a combination of the other factors were used without considering economics or congestion, the justification outcome would be quite different. In order to provide a complete picture and to truly understand whether or not this corridor is justified, all factors must be included in the analysis.

Furthermore, we question that this proposed freeway would even address the congestion issues – each time another freeway is built, we have another crowded freeway, due, at least in part, to induced demand, which FHWA and ADOT fail to consider and evaluate in the DEIS. That is a

¹ Congressional Budget Office. 2015. Public spending on transportation and water infrastructure, 1956 to 2014. Available online at <https://www.cbo.gov/sites/default/files/114th-congress-2015-2016/reports/49910-Infrastructure.pdf>.
² <https://www.epa.gov/ghgemissions/sources-greenhouse-gas-emissions>

ID	Topic	Response
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O-51-3	Purpose and Need	PN-3 For the additional factors used in the decision-making for the Preferred Alternative, see Draft and Final Tier 1 EIS Chapters 3-6.
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O-51-3 serious omission in evaluating the purpose and need, developing the alternatives, and evaluating the impacts of those alternatives.

Negative Impacts of Freeways

O-51-4 The construction of freeways can introduce or amplify various negative impacts to local economies, ecology, and public health, especially for vulnerable populations. Freeways create a bypass system, whereby travelers or even locals can reach their destinations without exposure to local markets and services. Although tax dollars contribute immensely to the building and long-term maintenance of freeways, this infrastructure presence does not pay back these funds and even potentially decreases cities' revenues as well the property values of taxpayers living near the freeway.³ Such effects should have been evaluated in the DEIS.

O-51-4 Focusing on interstates and freeways without providing adequate alternate transportation modes continues America's forced addiction to vehicles, in which people must have access to an automobile in order to commute or travel. This disproportionately affects low-income residents and is a huge burden to taxpayers. In addition, these roads frequently cut through low-income and predominantly minority neighbors, resulting in fragmentation of neighborhoods and displacement of people who do not have good housing alternatives.⁴

O-51-5 Local ecology suffers enormously. In fact, roads are a chief threat to both local and global biodiversity.^{5,6} Regarding wildlife, the leading cause of death for many animals and for reductions in local wildlife populations can be attributed to road mortality. More than one million vertebrates die on roads every day in the United States,⁷ but this number may be a significant underestimate of true mortality rates⁸ and also does not account for impacts on invertebrate species. Effects extend far beyond just direct mortality and the immediate roadway, however.⁹ The presence of a freeway fragments and alters species' habitats, which is the leading cause of species' declines and sensitivity.^{10,11} Chemical, light, and noise pollution associated with freeways act as a detriment to various species' breeding and migration patterns and can negatively affect normal behaviors.^{12,13} Lands cleared for roads can also foster invasive species, which substantially alter ecosystem composition and processes.¹⁴ In short, the

³ Mayors Innovation Project 2013
⁴ Dreier, P., J.H. Molenkopf, and T. Swanstrom. 2004. Place matters: metropolitics for the twenty-first century. University Press of Kansas.
⁵ Jackson, N.D., and L. Fahrig. 2011. Relative effects of road mortality and decreased connectivity on population genetic diversity. *Biological Conservation* 144:3143-3148.
⁶ Laurence, W.F., and A. Balmford. 2013. Land use: a global map for road building. *Nature* 495:308-309.
⁷ Environmental Science. 2016. The environmental impact of roads. Available online at <http://www.environmentalscience.org/roads>.
⁸ Zimmerman Teixeira, F., A.V. Pfeifer Coelho, I. Beraldi Esperandio, and A. Kindel. 2013. Vertebrate road mortality estimates: effects of sampling methods and carcass removal. *Biological Conservation* 157:317-323.
⁹ Holderegger, R., and M. Di Giulio. 2010. The genetic effects of roads: a review of empirical evidence. *Basic and Applied Ecology* 11(6):522-531.
¹⁰ Environmental Science 2016
¹¹ Jackson and Fahrig 2011.
¹² Environmental Science 2016
¹³ Summers, P.D., G.M. Cunnington, and L. Fahrig. 2011. Are the negative effects of roads on breeding birds caused by traffic noise? *Journal of Applied Ecology* 48:1527-1534.
¹⁴ Christen, D.C., and G.R. Matlack. 2009. The habitat and conduit functions of roads in the spread of three invasive plant species. *Biological Invasions* 11(2):453-465.

ID	Topic	Response
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O-51-4	Transportation	GlobalTopic_4 and EJ-1
O-51-5	Biologic Resources	GlobalTopic_4 and BR-2

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O-51-5 cumulative impacts of roads on the natural system are enormous and overwhelming.^{15,16} These are significant impacts, yet they are often overlooked or brushed aside in transportation planning.

O-51-6 Further, the implementation of road infrastructure threatens public health in multiple regards. Vehicle injuries are one of the leading causes of death in the world.¹⁷ Both motorists and non-motorists are affected. Freeways and interstates pose a risk to pedestrians and bicyclists, as these non-automobile users are exposed to hard-to-navigate areas near on and off ramps where vehicles are traveling at higher speeds in areas with restricted visibility.¹⁸ As with wildlife, effects are not limited to just direct mortality. Increased vehicle emissions from freeways can exacerbate numerous health conditions, including asthma, and can increase ground-level ozone production.^{19,20} Additionally, freeways contribute to elevated temperatures through the urban heat island effect, an issue with which many communities in Arizona struggle.^{21,22}

According to the Environmental Protection Agency, transportation—cars, trucks, airplanes, etc.—is the largest emitter of greenhouse gases and emits approximately 29 percent of our nation’s overall greenhouse gas emissions²³. A new freeway will simply further contribute to this problem and is one more reason that a non-freeway option should be considered.

Environmental Impacts of the Recommended Alternative
 The proposed corridor and associated infrastructure will negatively affect protected lands; wildlife, habitat, and wildlife-movement corridors; native vegetation and vegetation communities; endangered and special-status species (animals and plants); riparian areas and desert washes; air quality, including to Saguaro National Park (a Class I Area), non-attainment areas, and attainment areas that may be driven closer to non-attainment with the increased traffic associated with a freeway; and implications relative to climate change. These impacts will occur across the life of the project, including during surveying, construction, and implementation and maintenance.

O-51-7 Every attempt should have been made to avoid sensitive lands, riparian areas, important wildlife habitat and movement corridors, special status plants, and archaeological sites, but instead it is as if FHWA and ADOT are targeting some of our most critical and sensitive lands. Potential effects include, but are not limited to, soil disturbance and eradication of plant communities; soil erosion; disturbance of ground-dwelling species, including amphibians, reptiles, mammals, and ground-nesting birds; interference with species that prefer locations distant from roads; effects on species that do not cross open areas; interference with birds and bats, whether migrating or not; and potential for pollution or diversion of waterways.

¹⁵ Balkenhol, N., and L.P. Waits. 2009. Molecular road ecology: exploring the potential of genetics for investigating transportation impacts on wildlife. *Molecular Ecology* 18(20):4151–4164.
¹⁶ Trombulak, S.C., and C.A. Frissell. 2000. Review of ecological effects of roads on terrestrial and aquatic communities. *Conservation Biology* 14(1):18–30.
¹⁷ World Health Organization. 2016. Road traffic injuries. Available online at <http://www.who.int/mediacentre/factsheets/fs358/en>.
¹⁸ Mayors Innovation Project 2013
¹⁹ Frumkin, H., L. Frank, R. Jackson. 2004. *Urban sprawl and public health: designing, planning, and building for healthy communities*. Island Press.
²⁰ Van Vliet, P., M. Knape, J. de Hartog, N. Janssen, H. Harssema, and B. Brunekreef. 1997. Motor vehicle exhaust and chronic respiratory symptoms in children living near freeways. *Environmental Research* 74(2):122–132.
²¹ Hart, M.A., and D.J. Sailor. 2009. Quantifying the influence of land-use and surface characteristics on spatial variability in the urban heat island. *Theoretical and Applied Climatology* 95(3):397–406.
²² Mayors Innovation Project 2013
²³ <https://www.epa.gov/ghgemissions/sources-greenhouse-gas-emissions> . Accessed on July 6, 2019.

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O-51-6	Air Quality	AQ-1 and AQ-2
O-51-7	Air Quality	R-2, AQ-3, BR-1, and BR-2

ID	Comment Document
O-51-8	<p>Limiting and eliminating negative impacts to wildlife, vegetation, riparian areas, and cultural sites should be a top priority for FHWA and ADOT and cannot be mitigated relative to the Recommended Alternative. Significant efforts have been made within the proposed corridor to maintain large natural open spaces, to protect sensitive and common species, to provide wildlife movement corridors, to eradicate invasive species, and much more. Diverse groups from across the spectrum have collaborated on these efforts. The proposed I-11 corridor will reverse those efforts and negate decades of work among collaborative stakeholders.</p> <p>The proposed monitoring and mitigation in the DEIS is inadequate and quite frankly, the significant negative degradation of resources associated with the recommended alternative cannot be mitigated.</p>
O-51-9	<p>The DEIS promotes the economic benefits of the proposed I-11, but fails to adequately evaluate economic downside, including its contribution to an unsustainable economic structure and whether the proposed corridor could move the region further away from developing a more sustainable economy. In light of long-term drought, dwindling Colorado River water supplies and an impending shortage, more extreme heat, more extreme fires, and the various implications of climate change, assuming that business-as-usual can continue and that a new major interstate will help the economy, at least in the long-term, is unjustified.</p>
O-51-10	<p>The Recommended Alternative will harm Air Quality The National Ambient Air Quality Standards (NAAQS) set maximum allowable levels for six criteria air pollutants in order to protect human health and other secondary values, such as public safety. <i>See</i> 42 U.S.C. § 7409(b). Particulate matter with an aerodynamic diameter less than 10 microns (PM₁₀) is a pollutant subject to the NAAQS. <i>See</i> 40 C.F.R. § 50.6 (establishing the NAAQS for PM₁₀). Both short-term and long-term exposure to PM₁₀ can lead to increased premature mortality, increased hospital admissions and emergency room visits, and the development of chronic respiratory disease.</p> <p>Construction of and operation of a freeway in this region will exacerbate the already significant and unhealthy levels of PM₁₀ in both Maricopa and Pinal counties, which already have regular exceedances of the health-based standards, and will contribute to greater PM₁₀ issues in southern Arizona. There are also ongoing visibility issues associated with the particulates, which is a secondary consideration under the Clean Air Act. Furthermore, the freeway will contribute to higher ozone levels in the Phoenix-area, which already is in violation of the health-based standard and in Tucson which now appears to be in violation of the ozone standard after exceeding the standard four times in 2018. Each of the build alternatives would significantly increase the vehicle miles traveled. (DEIS at 2-29), and vehicles are the most significant source of pollutants that contribute to ozone formation.</p> <p>The DEIS should have given more attention to Saguaro National Park as a Class I Area and the special air quality protections under Section 162(a) of the federal Clean Air Act.²⁴ Unfortunately, it also neglected to adequately consider those impacts, which are also difficult to mitigate.</p>
O-51-11	<p>The Recommended Alternative will not advance Environmental Justice</p>

ID	Topic	Response
O-51-8	Biologic Resources	GlobalTopic_4, GlobalTopic_8 and BR-1
O-51-9	Air Quality	GlobalTopic_4 and E-3
O-51-10	Air Quality	AQ-3
O-51-11	Environmental Justice	EJ-1 and GlobalTopic_8

²⁴ Environmental Protection Agency. Air quality analysis: Arizona federal class I areas. Available online at https://www3.epa.gov/region9/air/maps/az_cls1.html.

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O-51-11

The DEIS does not adequately address environmental justice. It fails to recognize the disparate impact of the detrimental impacts on air quality of the build alternatives and specifically the Recommended Alternative on communities of color and low-income communities.

Communities of color have especially high asthma rates. African-American and Hispanic children visit emergency departments for asthma care more often than white children. Black Americans are 2 to 3 times more likely to die from asthma than any other racial or ethnic group. One in five Hispanic adults can't afford their asthma medicines, and adults who didn't finish high school are more likely to have asthma than adults who graduate high school or college²⁵. Asthma is exacerbated and triggered by pollutants associated with freeways, including particulates and those that will contribute to the formation of ozone.

The disparate impacts associated with climate change are also significant. Researchers at the University of Arizona "... found that the southwestern region is a hotspot both for physical climate change and for social vulnerability with a clear 'climate gap' between rich and poor. The Southwest is projected to become hotter and drier under future climate change, creating the potential for heightened vulnerability and increasing challenges to achieve [Environmental Justice]. The Southwest exhibits high social vulnerability, with rankings among the worst in the USA on a range of indicators, including poverty, health insurance, energy and food security, and childhood well-being."²⁶

O-51-12	Biologic Resources	LU-3, GlobalTopic_1, GlobalTopic_2, BR-9, R-1, and R-2
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O-51-12

The Recommended Alternative Will Exacerbate Urban Sprawl
 The Recommended Alternative will result in more development in currently undeveloped lands, promoting more urban sprawl and the negative impacts associated with it, including those outlined above. Routing the corridor in this area would itself cause irreparable damage to environmental resources; the subsequent growth spurred in these areas would further facilitate environmental destruction and degradation. Any time a new road is constructed in undisturbed areas, it causes direct wildlife mortality, fragments wildlife habitat, causes or exacerbates air and water pollution, and much more.

Impacts to At-Risk Species
 The DEIS fails to fully analyze the impacts to native plant and animal species present in the project area, especially those classified as federally "endangered" or "threatened," by the state of Arizona as a "species of concern," and by Pima County as "vulnerable" under the Sonoran Desert Conservation Plan as outlined in comments by the Coalition for Sonoran Desert Protection et al.

Impacts to Specific Areas
 The discussion below addresses some of the areas that will especially be affected by the Recommended Alternative. This is by no means a complete list.

South Section
 For detailed comments on the impacts to this area, please see the comments submitted by the Coalition for Sonoran Desert Protection and our previous scoping comments. There are a couple of issues we want to highlight, however.

²⁵ See <http://www.azdhs.gov/documents/prevention/tobacco-chronic-disease/az-asthma-burden-report.pdf>
²⁶ See http://www.climatejustice.arizona.edu/sites/default/files/Southwest_climate_gap_Wilder_etal_2016_published_version_1.pdf

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The Recommended Alternative would traverse the sensitive Avra Valley. Pima County's Sonoran Desert Conservation Plan (a multi-species habitat conservation plan [HCP] agreed to with U.S. Fish and Wildlife Service) requires that habitat values be protected in this area to off-set developments that occur in other areas. A freeway and associated developments would destroy these values and put the HCP in jeopardy. Avra Valley contains Critical Landscape Connections, Important Riparian Areas, Special Species Management Areas, Multiple Use Management Areas, and Agricultural In-Holdings.²⁷ All of these would be compromised, if not destroyed, if a freeway were built here. Furthermore, this route threatens Saguaro National Park, the Arizona-Sonora Desert Museum, and Tucson Mountain Park, including the Central Arizona Project (CAP) Wildlife Mitigation Corridor, which was protected as mitigation for the CAP canal decades ago. A freeway adjacent to these places would destroy their recognized values and have significant negative direct, indirect, and cumulative impacts on the resources they protect.

Central Section

Pinal County has a variety of state parks, designated wilderness areas, and national monuments that could be affected by this Recommended Alternative. This includes Ironwood Forest National Monument, portions of Sonoran Desert National Monument, Picacho Peak, and other protected areas. The two national monuments and their associated designated wilderness areas support abundant wildlife, including several sensitive species, cultural resources, and recreation opportunities. The Recommended Alternative and increased traffic are incompatible with the purposes of these monuments. FHWA and ADOT must carefully consider the direct, indirect, and cumulative impacts to these protected areas.

O-51-12

Sierra Club is concerned about the negative impacts of the Recommended Alternative on Picacho Peak State Park and strongly opposes any new highway alignments in the Picacho Peak area. The construction of a major transportation route west of the Picacho Peak State Park would be detrimental to the park and its visitors and would isolate this little gem from any connectivity to surrounding lands.

The state park is known for its unique geological significance, outstanding and varied desert plants and animals, and its historical importance. The hike/climb to the summit of this prominent landmark is a special accomplishment for all who undertake it. While climbing up the east side of the mountain, one hears the constant hum of truck and car traffic on I-10 and the occasional rattling and whistling of trains. It is impossible to ignore the sound, and the noise reduces the quality of this trek through protected desert. But once the trail crosses the saddle, the west side of Picacho Peak is quiet. A hiker can hear the birds, the wind through the cactus spines, and the natural quiet of the desert. Building a new freeway to the west of the state park (Option F) would destroy this ambiance. It would isolate the state park from all surrounding landscapes making it an island – biologically and culturally. There would be no place to escape the noise and influence of civilization in this formerly tranquil park.

Furthermore, this alternative route is not needed and would be an unnecessary expense. The eastern route (I-10, purple and green alternatives) is currently being upgraded to three lanes in each direction. Miles of new freeway construction west of Picacho Peak is simply unnecessary and ill-advised.

North Section

²⁷ See http://webcms.pima.gov/UserFiles/Servers/Server_6/File/Government/Office%20of%20Sustainability%20and%20Conservation/Conservation%20Science/The%20Sonoran%20Desert%20Conservation%20Plan/CLS_Bio_0211_LowRes.pdf.

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ID	Topic	Response
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O-51-12

The Recommended Alternative for the proposed I-11 freeway in the Phoenix area is not justifiable and will have significant negative impacts on the people, plants and animals of the region.

Maricopa County includes several regional parks, national monuments, and other public lands, wilderness areas, and protected lands that could be affected by this proposed corridor. Special consideration should be given to the Hassayampa River and other riparian and flood-prone areas relative to environmental impacts, as well as public safety. The Juan Bautista de Anza National Historic Trail runs through portions of Maricopa County and could be affected by this proposed corridor. Special consideration and avoidance of parks and wildlands is necessary, and impacts should be thoroughly evaluated, including to Buckeye Hills, White Tanks, and Estrella Mountain regional parks; Sonoran Desert National Monument; Sierra Estrella Wilderness; North and South Maricopa Wilderness, and others. This route will promote urban sprawl in Rainbow Valley and exacerbate the air quality problems for an area already plagued with high ozone and particulate concentrations.

The Recommended Alternative remains the most intrusive route in the Vulture Mountain Recreation Area (VMRA) located near Wickenburg, as the alignment appears to cut off about a quarter of the western end of this regional park. The park’s upper Sonoran Desert remains relatively pristine despite past impacts from mining and other uses and continues to hold much biological diversity and natural beauty. According to the 2012 Master Plan for the VMRA, the park is home to many species of wildlife including black tailed rattlesnakes, desert tortoise, Gila monsters, mule deer, javelina, mountain lion, and kit fox. In addition, the park contains an Area of Critical Environmental Concern (ACEC) to help protect several raptor species that utilize the cliffs of the Vulture Mountains. This past year, about 1,000 acres of the eastern part of the park was conveyed to Maricopa County under the Recreation and Public Purposes Act in part to provide additional protection to the perennial Hassayampa River and nearby corridor. The bulk of the park, about 70,000 acres, continues to be jointly managed by the Bureau of Land Management and the County.

Construction of I -11 through the park has further implications. If built, another plan exists for an extension of H 74 in the Morristown area westward across the Hassayampa through the southern part of the park and then connecting with I – 11. Dubbed the Lake Pleasant Freeway, such a scenario would have an end result of riddling the park with freeways, cutting it into sections and greatly blocking wildlife movement and degrading its scenic qualities. This is a significant cumulative and unmitigable impact.

Much time and effort has gone into the creation of this park; its primary purpose is to protect open space and scenic values for recreation. If I-11 is built as proposed, these values would be greatly impaired.

Interstate 11 would cross the Gila River near the community of Liberty, about midway between the Tres Rios Recreation Area and Robbins Butte Wildlife Area. There are remarkable birding and wildlife populations downstream of the 91st Ave. water treatment plant west to Tres Rios. Despite some urbanization, this Salt/Gila segment downstream to Robbins Butte remains a flyway and corridor for wildlife, and should not be unnecessarily interrupted by a busy freeway like I – 11.

The proposed route, once north of the proposed park, would curve to the east side of Black Mountain, bringing the freeway close to Wickenburg Airport where it would eventually join up with US 93. In addition to degrading and fragmenting a large BLM area, the freeway would encourage urban sprawl on the State Trust Lands to the west and north of the county park.

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ID	Topic	Response
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O-51-13	Transportation	AC-9
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A Rail Only Alternative Should Have Been Analyzed

Sierra Club has long supported a passenger rail line connecting Tucson to Phoenix with stations at key points in between. Such a line could be expanded to other communities along a route tracking the I-10 corridor. A high-capacity passenger rail line is essential for relieving congestion on highways and getting people to their destinations. Such a rail system can also help protect public health, benefit our economy, enhance the human environment, and reduce negative environmental effects by decreasing transportation-related pollution and energy use and by reducing the need to build additional roadways and other infrastructure.

Regarding passenger transport, ADOT’s own studies (i.e., passenger rail study) have found passenger rail from Phoenix through Tucson to Nogales in existing rail corridors to be viable. Passenger rail enjoys healthy success in California, Utah, and the Pacific Northwest, and there is no reason to believe it would not succeed in Arizona. In these times of global climate change, rail must be our transportation future – the sooner we begin developing it, the better.

By locating a rail line in an already-developed area, such as along the I-10 corridor, which is already fragmented by the freeway, the needs of I-11 could be met while providing opportunities for safer and more efficient travel. A thorough EIS and evaluation of alternatives is needed to determine the full impacts, however. I-10 is the most commonly traveled route between Tucson and Phoenix and is used by travelers from most of the Phoenix area. Similarly, this route would provide a more direct connection between the Phoenix and Tucson population centers. Following the route that is most commonly traveled could promote ridership as the rail would act as both an introduction and a reminder to users of I-10 that alternative transportation options are available. It also provides more of what is needed to make this successful – mass transit on each end of the line. There is still work to do in these communities, but Tucson and Phoenix have the most developed transit. By placing the rail line through more remote areas, including areas that are not as heavily traveled or through a new corridor, ridership may not be as high. Similarly, by concentrating on areas that are already disturbed, such as along existing freeways or rail lines, damage to environmental resources could be greatly diminished and less infrastructure may be needed.

The DEIS is dismissive of considering rail, inferring that it is already handled. “The Selected Corridor Alternative would parallel I-10 to Eloy and then divert north, entering Phoenix from the east (ADOT 2016). With local and regional transit systems in place within the Study Area, additional passenger rail capacity is not warranted at this time.” (DEIS at 2-11) That is just not true. Additional passenger rail is warranted and needs to be funded. We ask that ADOT drop this I-11 proposal and concentrate on the needed rail between Phoenix and Tucson.

Summary

Thank you again for the opportunity to provide comments on the DEIS developed for this project. FHWA and ADOT appear to be stuck in the past with transportation planning. Sierra Club encourages you to look forward and move beyond outdated transportation solutions that destroy habitat, harm communities, and continue to give us unhealthy air quality. FHWA and ADOT must seriously consider whether this project is necessary and appropriate or whether it is being pushed forward based on outdated and inaccurate data and needs. Negative impacts to our state’s diverse natural resources are unavoidable with a project of this magnitude, and mitigation efforts will not adequately offset the direct, indirect, and cumulative negative effects. We expected a thorough analysis of the impacts and a hard look at the full range of reasonable alternatives, including those

O-51-13

O-51-14

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O-51-14

that do not envision a freeway and its associated infrastructure. Unfortunately, FHWA and ADOT did not provide that. We encourage you to withdraw this proposal and go back and evaluate non-freeway alternatives.

FHWA and ADOT should break with tradition and offer fresh alternatives that focus on some of the real issues facing the 21st century such as retention of large important open space areas and reduction of fossil fuel consumption to improve air quality and limit climate change. To this end, I-11 is a monumental distraction, encouraging the very things we need to put to rest. We recommend that FHWA, ADOT, and their partners instead study other methods of moving people and freight from Nogales north across Arizona to our neighboring states.

Sincerely,



Sandy Bahr
Chapter Director
Sierra Club – Grand Canyon Chapter

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O-51-14	Alternatives	GlobalTopic_4
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ID	Comment Document
	Tucson Public Hearing, May 8, 2019

ID	Topic	Response
O-17-1	Air Quality	GlobalTopic_1, AQ-2, and AQ-3

O-17-1

15 RUSSELL LOWES:
 16 Hello. My name is Russell Lowes. I'm the
 17 energy chairman for the Sierra Club Rincon Group. The
 18 Sierra Club Rincon Group has a membership of about
 19 5,000, or a little more than 5,000 people. And the
 20 Sierra Club Rincon Group and chapter opposes the
 21 recommended alternative route described in the Tier I
 22 DEIS for Interstate 11.
 23 This would create a brand-new freeway, a
 24 large part of it through Avra Valley. It would
 25 completely bypass existing infrastructure in the

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O-17-1

1 Tucson metropolitan area. It would go against the
 2 concept of living within our means, a concept that at
 3 the age of global warming, it's teaching us anew.
 4 This new freeway would destroy large strips
 5 of pristine desert, disrupting thousands of the
 6 ephemeral streams. It would cause irreparable damage
 7 to wildlife corridors. And due to the CO2 problem of
 8 suburban sprawl and urban sprawl, it will cause more
 9 global warming, which is what I will focus on here. T
 10 The global warming increase from this freeway
 11 stretch is barely covered in the draft EIS. It's
 12 really a joke. In the section titled 3.10.1.4,
 13 Greenhouse Gases, it has exactly four paragraphs in
 14 the entire EIS that are dedicated to the problem of
 15 greenhouse gas generation. The remainder of the
 16 section deals with, ironically, the global warming
 17 impact on the highway itself.
 18 This route would add many millions of tons of
 19 extra carbon into the air; by one, construction of the
 20 freeway, including raw-material production,
 21 transportation of those materials and on-site
 22 construction. Two, maintenance over the 50-year span
 23 of the freeway, which is generally considered. Three,
 24 auto emissions from a new freeway which would be
 25 higher than the emissions from an existing expanded

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0-17-1

1 freeway, with higher vehicle miles traveled. And
 2 four, desert sprawl around the new freeway would cause
 3 a much higher CO2 total than expanding the existing
 4 infrastructure, including through Tucson.

5 The impacts of the additional CO2 emissions
 6 need to be fully studied, not just given lip service
 7 in four paragraphs. Two studies to look at, among
 8 others, are one, Estimation of Carbon Dioxide Emission
 9 of Highway Construction, by Xianwei Wang, et al.; and
 10 two, Greenhouse Gas Emissions from Asphalt Pavement
 11 Construction: A Case Study in China, Feng Ma, et al.

12 If a scientific study is performed, then the
 13 freeway route will be shown to be much more harmful to
 14 our climate than expanding the existing route. This
 15 favored route is one of much more environmental
 16 destruction, including worsening the impact of global
 17 warming. Thank you.

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I-1328-1	Biologic Resources	GlobalTopic_4, BR-1, and AQ-1
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I-1328-1

13 REVEREND KENNETH BROWN:
 14 Good afternoon. My name is Reverend Kenneth
 15 Brown. I'm here representing the Sierra Club Rincon
 16 Chapter and also the Presbyterian Church of Southern
 17 Arizona.
 18 I am definitely speaking in opposition to the
 19 proposed Highway 11 corridor. It is a direct threat to
 20 the environment which is being threatened in many, many
 21 ways now.
 22 And the gentleman that just spoke referenced
 23 the inner-governmental panel ecosystem diversity of the
 24 UN that says within 20 years we are on track to kill at
 25 least 500,000 to a million different species of plants

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I-1328-1

1 and animals and threatening the entire global
 2 ecosystem.

3 It is a shocking report. I'm going through it
 4 carefully and studying it and trying to understand it
 5 more myself and the impact that it can have on the
 6 future.

7 This proposed I-11 will increase that
 8 possibility of destruction many, many, many times, as
 9 Dr. Warren just mentioned as well.

10 The emissions from carbon monoxide from cars
 11 trucks and motorcycles is anywhere from 30 percent up
 12 to 40 percent of the total carbon emissions now, and
 13 that's an EPA estimate which is usually quite low that
 14 I've seen from other sources.

15 And we need to start looking at that aspect of
 16 it rather than increasing of traffic vehicles along our
 17 whole southern border up into Wickenburg area and then
 18 all the way to Canada.

I-1328-2

19 I -- since it's like redoing what was undone
 20 over the last 75 years, when we had the best railway
 21 system in the world, until automobiles and the highway
 22 system just wrecked the whole thing, and now we have
 23 nothing, just a few lines.

24 I think that we need to be putting our
 25 resources into light rail from Tucson to Phoenix and

I-1328-2	Transportation	AC-9 and GlobalTopic_4
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I-1328-2

1 north, further west, and Las Vegas, and on to LA, so
 2 that we're putting our resources to fund public
 3 transportation that includes many, many more people
 4 until it gets vehicles off the road instead of putting
 5 more on the road.

I-1328-1

6 I am also concerned about the future
 7 generations that are going to be suffering. Our
 8 children, grandchildren, in particular, are not going
 9 to have a future if we continue this kind of pace right
 10 now.

11 Thank you very much.

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Sonoran Audubon Society

O-54-1

Sonoran Audubon Society is the National Audubon chapter in the West Valley communities in the Phoenix Metro Area. Our 600 members watch birds for fun and, as volunteers, count birds for scientific monitoring of bird populations. We see no reason to build a road in areas that are prime habitat for wildlife and birds, both those that are year round in AZ and those many species who fly through on yearly long distance migrations. These areas and their denizens attract birding enthusiasts from all over the world to the Phoenix area. These folks buy things contributing to the economic well-being of our state millions of dollars per year. Do we really want to jeopardize this by building intrusive infrastructure on sensitive lands and not on already-existing ROWs? Sonoran Audubon opposes the recommended "Purple" route for Route #11 because it would bisect farmlands, it is too close to the Gila River flood plain and because its placement on this alignment increases the danger of losing Yuma Ridgeway's Rail occupied habitat, as demonstrated by Audubon Arizona.

ID	Topic	Response
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O-54-1	Recommended Alternative	GlobalTopic_4 and GlobalTopic_2
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The Nature Conservancy in Arizona
 Phoenix Conservation Center
 7600 N. 15th Street, Suite 100
 Phoenix, Arizona 85020-4330
 Tel (602) 712-0048 nature.org/arizona
 Fax (602) 712-0059

July 8, 2019

Arizona Department of Transportation
 4000 N. Central Ave., Suite 1500
 Phoenix, AZ 85012

Submitted Via:
 i11study.commentinput.com

Re: Comments on the I-11 Draft Tier 1 EIS

On behalf of The Nature Conservancy in Arizona (Conservancy), thank you for the opportunity to provide comments on the proposed Interstate 11 (I-11) Draft Tier I Environmental Impact Statement (EIS).

In 2013, as part of the Level 2 Planning and Environment Linkage review, the Conservancy submitted a systematic analysis of 61 possible alignments for I-11 in northern and central Arizona. The Conservancy provided significant analysis on impacts to wildlife movement and habitat fragmentation that we revisit here to evaluate the preferred alternative.

While segment-specific comments on the EIS are provided below, the Conservancy has one specific overarching concern with the EIS related to overall mitigation assessment and approach.

Utilization of a single 2,000-foot wide corridor has landscape level implications for habitat fragmentation, habitat loss, wildlife movement, and broad impacts to Sonoran Desert tortoise habitat. While a 400-foot right-of-way will be identified during a future analysis, neither analysis can fully evaluate the direct and indirect impacts of development. In many segments, cumulative loss and degradation of habitat will occur on a landscape scale, particularly in corridors with new construction.

In some cases, the degradation and complete loss of habitat is significant. Incremental and localized mitigation does not serve many of the priority wildlife species. The Conservancy prefers the application of a Programmatic Mitigation Plan (PMP) that identifies key areas and strategies to focus habitat mitigation efforts that are likely to provide greater mitigation benefits.

Alongside traditional mitigation approaches and the outright acquisition and preservation of lands for nature conservation, the PMP should focus on benefits to major wildlife corridors where these protected and restored lands ensure connectivity is maintained between large intact habitat blocks.

Preferred Alternative Segment Comments

The Conservancy sees the potential to reduce or avoid adverse impacts, both direct and indirect impacts, with a hybrid alignment that includes a combination of corridor options from both the build and no-build alternatives.

O-52-1

ID	Topic	Response
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O-52-1	Biologic Resources	Thank you for your input and interest in the I-11 Corridor Tier 1 EIS. FHWA and ADOT value the feedback on the Draft Tier 1 EIS provided by your organization. GlobalTopic_8, GlobalTopic_2, GlobalTopic_1, BR-1, BR-2, BR-4, BR-6, and BR-10
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The Nature Conservancy
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Table 1. 2013 TNC Planning for Environmental Linkages Analysis with relevant 2019 Tier I EIS route labels indicated. Green boxes indicate direct impacts found; cross-hatching indicates indirect impacts.

Tier 1 EIS Route	Segment #	Segment Name	Segment Type	ESA Species	BLM Desert Tortoise Lands	Conservation Managed Area	Core/Limited Wildlife Habitat	Perennial Surface Waters	Riparian/Xero-Riparian Habitat	Sonoran Desert Habitat	Mojave Desert Habitat	Linkage/Unfrag. Habitat	Options to Offset
Q3	21	I-10	Existing										Impacts Limited
R	16	Hassayampa Fwy	New										Impacts Limited
N	87	SR 303	Expand										Wildlife Linkages
Q1	19	SR85	Expand										Wildlife Linkages
I2	14	Hassayampa Fwy	New										Wildlife Linkages
K	83	I-8	Existing										Wildlife Linkages
H	10	I-8	Existing										Wildlife Linkages
S,U,X	18	Hassayampa Fwy	New										Minimize & Offset
Q2	20	SR85	Expand										Minimize & Offset
N	85	SR 30	Expand										Minimize & Offset
M	15	Hassayampa Fwy	New										Minimize & Offset
L	84	Hassayampa Fwy	New										Minimize & Offset
U,X	17	Hassayampa Fwy	New										Avoid

O-52-1

Segment U and X - VMRA and Wildlife Linkages

In our 2013 analyses, we recommended that the construction of an interstate along this segment should be avoided because of the direct and indirect impacts to the resources in this area cannot adequately be mitigated. We evaluated alternative parallel alignments 3 miles to west and 3 miles to east of segment 17 and found similar impacts. These alternatives are roughly comparable to current segments S, U, and X. If, however, these impacts are unavoidable, measures should be taken to minimize or offset loss or degradation, including conducting studies to improve wildlife linkages. Opportunities exist to offset impacts to Sonoran Desert Tortoise habitat through existing BLM Desert Tortoise Mitigation Policy.

Segment M, L, I2 -

Use of existing routes through State Highway 85 and Interstate 8 (Routes H, K, Q1) offer transportation connectivity with substantially lower costs and significantly less impact to wildlife connectivity than new routes proposed in segments N, L, and I2. Those segments, located north and east of Sonoran Desert

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National Monument are critical wildlife corridors for many species that are challenging to adequately mitigate. The level of new construction required to establish an interstate along these segments would result in habitat loss or degradation to native habitat, in particular xero-riparian and Sonoran Desert habitats, to Sonoran Desert Tortoise and Desert Bighorn Sheep.

While opportunities exist to offset impacts to Sonoran Desert Tortoise habitat through existing Bureau of Land Management’s Desert Tortoise Mitigation Policy, construction of I-11 along this route would have the effect of isolating wildlife populations in the northern portion of the Sonoran Desert National Monument from critical native habitats in the Buckeye Hills and Sierra Estrella. This preferred corridor, in particular, would have significant indirect impacts associated with the development of interstate exits to provide vehicle services and future development.

Segments C, D – Avra Valley

We did not study the southern routes during our 2013 analysis, but have concerns about Segments C and D. Those would have adverse impacts on wildlife and the previously established Tucson Mitigation Corridor. That is a 4.25 sq. mile block connecting Tucson Mountain Park and Saguaro National Park with Tohono O’odham lands. It was acquired by the Bureau of Reclamation to mitigate the substantial wildlife impacts from another piece of linear infrastructure, the Central Arizona Project. As such, it serves an important function and should not be treated as a convenient parcel of vacant land.

Specifically with regards to the mitigation associated with Avra Valley that includes existing Tucson Mitigation Corridor lands, ADOT proposes to acquire “property (at a 1:1 ratio) to support additional wildlife connectivity corridors within Avra Valley for the number of acres of the TMC that will be impacted by I-11.” The construction of I-11 across the Tucson Mitigation Corridor, which was set aside as mitigation for the CAP’s impacts to wildlife movement, would eliminate the function for which it was designed. In order to achieve a no-net-loss of both acreage and ecological function, substantial preservation of new habitat would be required. The location of the habitat preservation must be strategic, allowing for connectivity between the Tucson Mountains and the Roskrige and Silverbell Mountains. This will likely require habitat preservation of far more than a 2:1 or 3:1 ratio.

Cumulative Impacts on Desert Tortoise Habitat and Listing

The cumulative impacts of the Preferred Alternative on Sonoran Desert Tortoise (SDT) are a significant concern. The tortoise was recently considered for listing under the Endangered Species Act because of habitat loss, fragmentation, and other impacts across its range. A significant factor in the federal decision not to list the species was the creation of a Candidate Conservation Agreement in 2015 in which ten federal and state agencies agreed to a series of conservation actions to “minimize stressors and maintain or improve the status” of the species. Arizona Department of Transportation was a signatory to that agreement, which included commitments to:

- Avoid when practicable or minimize or mitigate unavoidable adverse effects on SDT populations and habitat during deployment of land management activities.
- Avoid, where practicable, or otherwise minimize or mitigate adverse effects of actions that could result in isolation of known SDT populations and/or landscape-level fragmentation of SDT habitat.

The preferred alternative impinges on SDT habitat in Vekol Valley, Rainbow Valley, and Hassayampa River Valley. It would fragment tortoise habitat in those areas and along Avra Valley, creating isolated populations in the mountains to either side of each valley. As with many transportation corridors, communities and lands along the route are prone to increased development pressures. These secondary

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The Nature Conservancy
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impacts could result in the conversion of each valley to more intensive land uses, with significant and widespread loss of tortoise habitat.

With the development of I-11, it is considerably more likely federal agencies would need to revisit the question of listing the Sonoran Desert Tortoise, based on the changed status of the species. Listing of this species could have real impact on future development proposals and growth in Arizona. Thus, a decision to route I-11 through currently undeveloped valleys could, long-term, have a magnitude of economic costs to communities along the I-11 corridor.

Conclusion

The Conservancy wants to emphasize the need to evaluate and mitigate for the cumulative ecological impacts of a project at this scale, particularly with regards to wildlife corridors. There is great potential to reduce or avoid adverse impacts, both direct and indirect, with the use and expansion of existing transportation routes. The Conservancy appreciates the opportunity to comment, and we look forward to continuing to work with ADOT to develop critical infrastructure routes while protecting local communities and our shared natural resources of public land, water, and wildlife.

Sincerely,



Nicole Hill
Arizona Lands Program Director

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O-33-1	Avra Valley	GlobalTopic_1, GlobalTopic_4 and BR-9
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The Trust for Public Land

The Trust for Public Land, with a mission of protecting land for people, opposes the recommended alternative route through Altar and Avra Valleys as described in the Tier 1 DEIS for Interstate 11. This route is located west of Tucson and passes through a very sensitive area of the Sonoran Desert. It would impair important wildlife habitat for federally listed species, including include mitigation lands for Pima County's Section 10 Habitat Conservation Plan. It would have a negative impact on important public lands including Saguaro National Park and Ironwood Forest National Monument where the recommended alternative route pass very close to these remarkable units of the National Park Service and Bureau of Land Management. We would recommend that the route from Sahuarita to Marana instead follow the existing route of Interstate 10, as preferred by City of Tucson and many other stakeholders, in order to reduce the negative impacts of the proposed new interstate on the important natural resources of Pima County and the associated economic tourist benefits from the area.

O-33-1

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Tucson Audubon inspires people to enjoy and protect birds through recreation, education, conservation, and restoration of the environment upon which we all depend.

July 8, 2019
 Interstate 11 Tier 1 EIS Study Team
 c/o ADOT Communications
 1655 W. Jackson St., MD 126F
 Phoenix, AZ 85007

Comments submitted electronically to I-11ADOTStudy@hdrinc.com

RE: Comments on the Interstate 11 Tier 1 Draft Environmental Impact Statement, Nogales to Wickenburg

To whom it may concern,

Thank you for this opportunity to provide comments on the Interstate 11 Tier 1 Draft Environmental Impact Statement (DEIS), Nogales to Wickenburg. Founded in 1949, Tucson Audubon is southeast Arizona's leading non-profit engaging people in the conservation of birds and their habitats. We submit these comments on the behalf of our 3,000 members and our organization. These comments are in addition to our joint comments submitted by the Coalition for Sonoran Desert Protection and oral comments provided at the May 8, 2019 public meeting in Tucson.

Tucson Audubon has been involved in the scoping and stakeholder process for the proposed I-11 interstate for many years. Most recently, we joined the I-11 Joint Stakeholder Community Planning Group convened by the Federal Highways Administration and the Arizona Department of Transportation. Despite the process being broken up into two groups, the process resulted in both groups coming together to author our Joint I-11 Position which was sent to the FHA and ADOT. The Joint Position was firmly against any new build option through the Avra Valley and supported an innovative transportation option on existing highways.

Tucson Audubon DOES NOT support any proposed highway option through the Avra Valley. We are highly concerned with the potential negative impacts to irreplaceable Sonoran Desert habitat and do not consider this Tier 1 Environmental Impact Statement to be at all sufficient to 1) demonstrate the Avra Valley has the preferred location for I-11, or 2) fully document or explain the multitude of possible damages a highway through this region would cause.

In 2001, Tucson Audubon, in coordination with the National Audubon Society and BirdLife International, founded the Arizona State Important Bird Areas (IBA) program. Tucson Audubon has since partnered with Audubon Arizona to continue to identify and protect a network of sites that provide critical habitat for common and threatened birds living within or migrating through habitats in Arizona. Arizona's IBA program partners with the Arizona Game and Fish Department (AZGFD) through the Arizona Bird Conservation Initiative (ABCI), the Sonoran Joint Venture, the Intermountain West

300 E. University Blvd., #120 - Tucson, AZ 85705 · TEL 520-209-1814 · FAX 520-623-3476

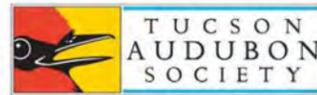
TUCSONAUDUBON.ORG

ID	Topic	Response
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O-59-1	Biologic Resources	Thank you for your input and interest in the I-11 Corridor Tier 1 EIS. FHWA and ADOT value the feedback on the Draft Tier 1 EIS provided by your organization GlobalTopic_1, BR-1, BR-5, BR-7, BR-8, and BR-10
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O-59-1

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Tucson Audubon inspires people to enjoy and protect birds through recreation, education, conservation, and restoration of the environment upon which we all depend.

Joint Venture, Arizona State Parks, U.S. Fish and Wildlife Service, U.S. Forest Service, BLM, and various other governmental and non-governmental organizations, colleges, and universities. Tucson Audubon Arizona now has 45 recognized IBAs, and the program continues to grow. Conservation Biologist Jennie MacFarland maintains the Arizona IBA database and co-administrates the Program with Arizona Audubon's Director of Bird Conservation, Tice Supplee.

Avra Valley, including Saguaro Park West, is part of the designated Tucson Mountains Important Bird Area. This IBA consists of the following public lands: Saguaro National Park (Tucson Mountain District), Tucson Mountain Park (Pima County), and Arizona Sonora Desert Museum. This IBA centers on the Tucson Mountains and adjacent Upland Sonoran Desert habitat.

O-59-1

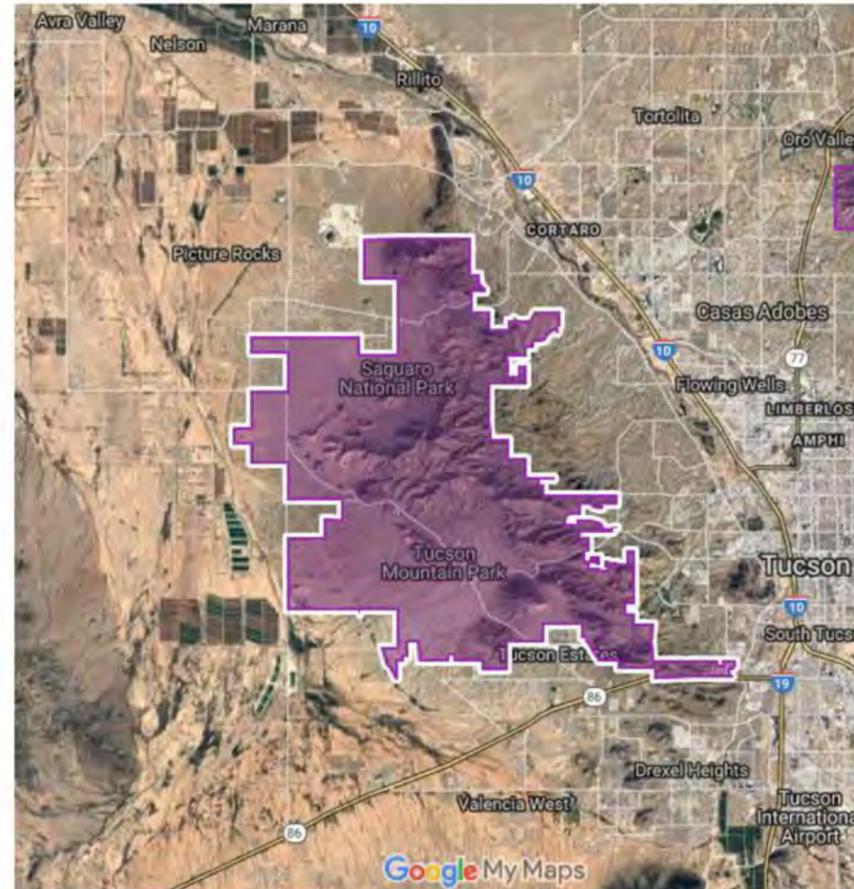


Figure 1: The Tucson Mountains Important Bird Area. More information at http://aziba.org/?page_id=38

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ID	Topic	Response
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Tucson Audubon inspires people to enjoy and protect birds through recreation, education, conservation, and restoration of the environment upon which we all depend.

The Sonoran Desert has a greater diversity of life forms and plant communities than other North American deserts. The Tucson Mountains are a small, isolated desert range west of Tucson in southern Arizona. Some of the densest stands of saguaro to be found anywhere on earth are within this IBA. The Tucson Mountains are a floristically rich area due to several factors, especially geographic location, elevation range, and habitat diversity. This IBA was specially designated as a “Rare, Unique, or Exceptional Representative Habitat/Ecological Community – Upland Sonoran Desert” and for several bird species including Gilded Flicker, Elf Owl and Costa’s Hummingbird. There are many other species of special interest. Any fragmentation of this complex and delicate ecosystem would be highly detrimental to the quality and continued existence of this unique habitat.

Already it is estimated we have lost over 60% of native plant coverage in the Sonoran Desert. The spread of invasive species, urban habitat fragmentation and human-induced fires have all contributed to this loss. The proposed I- 11 highway route through the Avra Valley would drastically increase the negative impact of all these hazards – invasive species, fragmentation and fire. Highways are known corridors for buffelgrass and other rapidly spreading invasive species. Highways also become impassible barriers to migratory land species, distractions to migratory bird species, and, of course, fragment and destroy habitat for all living creatures. Fire may, in the end, be the biggest threat of this proposed highway. Highways are known fire starting points for many reasons including the dragging chains of tow vehicles. Combined with invasive species, the Sonoran Desert is highly threatened by changes to the fire regime.

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Figure 2: Saguaro National Park and the Avra Valley.

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Tucson Audubon inspires people to enjoy and protect birds through recreation, education, conservation, and restoration of the environment upon which we all depend.

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Tucson Audubon has also invested time and resources into partner restoration projects at the edge of the Avra Valley, along the Santa Cruz River. Significant investments are being made not only by Tucson Water, Pima County and the Town of Marana in this region, but also partner organization like Tucson Audubon, in restoring this precious landscape and improving the recreation and habitat value of the lands surrounding urban centers. These urban centers recognize the importance of protecting, conserving and restoring the natural environments and open space for scenic value, clean water, clean air and fire and flood protections. A new highway through the Avra Valley would threaten all of these conditions and counter the progressive steps taken by these regional governments to protect existing urban centers.

The Pima County Multi-Species Conservation Plan, as part of the Sonoran Desert Conservation Plan, calls for a certain amount of mitigation as part of the program. Tucson Audubon manages two Army Corps of Engineers (ACE) Section 404 Clean Water Act In Lieu Fee (ILF) Mitigation Fund parcels that would be impacted by the preferred I-11 corridor and wipe out years of investment by the county and jurisdictions to restore this landscape.

The proposed corridor currently bisects and encompasses the majority of the Martin Farm, between West Valles Lane and West Treatment Plant Road. The City of Tucson/Tucson Water owns Martin Farm, and Tucson Audubon Society has a Right of Way for the ILF site since 2004. This ROW runs in perpetuity consisting of the creation of habitat by the restoration and the long-term maintenance of plants and habitat for wildlife. Tucson Audubon also manages the ILF mitigation site at Simpson Farm, owned by the City of Tucson (COT) and managed by Tucson Water, located in Avra Valley along both banks of the effluent and storm water dominated Santa Cruz River. Tucson Audubon has a 99-year Right of Entry Agreement starting in November 19th, 2001 until November 19th, 2100 to the 1,700 acre property known as the Santa Cruz River Habitat Project. Simpson Farm is home to several pairs of relocated Burrowing Owls.

Any actions, including the construction of a new highway, would need to take into account 1) the work and compensation required for the outright destruction of ILF sites and 2) the need to mitigate for the noise, light, odors and other factors will adversely impact these ACE ILF projects. The preferred route for the proposed I-11 would essentially require mitigation for existing mitigation sites – clear sign that this project would cause irreparable damage, destroy existing investments and be unnecessarily costly.

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Figure 3 Martin Farm area and Trico-Marana Bridge, Kendall Krosen

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Figure 4 A young burrowing owl at the Simpson Farm reintroduction site with Avra Valley in the background. Dan Weisz.

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Tucson Audubon inspires people to enjoy and protect birds through recreation, education, conservation, and restoration of the environment upon which we all depend.

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Tucson Audubon welcomes the innovation and creativity the co-location along existing I-19 and I-10 could bring to our community. The studies prompting the consideration for a new highway route are outdated and fail to take into account new technologies and improved public transit options. Tucson Audubon would be interested in continuing to be involved in future public and stakeholder processes. We look forward to future discussions on building a more sustainable and public driven transportation plan for this region.

Respectfully,

Jonathan Lutz
Executive Director, Tucson Audubon Society

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O-15-1	Avra Valley	GlobalTopic_1, BR-1, BR-5, BR-7, BR-8, and BR-10

O-15-1

8 JONATHAN LUTZ:

9 Good afternoon. My name is Jonathan Lutz.

10 I'm the executive director for the Tucson Audubon

11 Society. I have over 10 years experience in leading

12 audubon entities in three states. My comments today

13 are on behalf of the 70-year-old Tucson Audubon

14 Society and its over 3,000 member households.

15 To begin, Tucson Audubon does not

16 support any proposed highway option through the Avra

17 Valley. Tucson Audubon has participated in the

18 stakeholder engagement process for the proposed

19 highway for many years, including, most recently, the

20 invitation-only 2018 series of meetings hosted by the

21 Arizona Department of Transportation and the Federal

22 Highway Administration. We remain highly concerned of

23 the potential negative impacts to the irreplaceable

24 Sonoran Desert habitat, and do not consider this Tier

25 I Environmental Impact Statement to be sufficient.

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1 Specifically, we believe it fails to do the
 2 following: Justify the purpose and need, let alone
 3 demonstrate why the Avra Valley is the preferred
 4 location for I-11, or to fully document or explain the
 5 multitude of possibly unintended consequences and
 6 damage a highway through this region would cause.

7 The Avra Valley, including Saguaro
 8 National Part West, is part of the designated Tucson
 9 Mountains Important Bird Area, or IBA. This IBA
 10 consists of the following national treasures: Saguaro
 11 National Park, Tucson Mountain District, Tucson
 12 Mountain Park, Pima County and the Arizona Sonoran
 13 Desert Museum. The IBA centers on the Tucson
 14 Mountains in the adjacent upland Sonoran Desert
 15 habitat.

16 The Sonoran Desert has a greater diversity of
 17 life forms and plant communities than the other North
 18 American deserts. The Tucson mountains are a small
 19 semi-isolated desert range west of Tucson in southern
 20 Arizona. Some of the densest stands of Saguaro to be
 21 found anywhere on Earth are within this IBA. The
 22 Tucson mountains are a floristically rich area due to
 23 several factors, especially geographic location,
 24 elevational range and habitat diversity.

25 This IBA was designated specifically as a

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1 rare, unique or exceptional representative habitat and
 2 ecological community representing the Upland Sonoran
 3 Desert, and for several bird species, including Gilded
 4 Flicker, the Elf Owl and the Costas Hummingbird. To
 5 remind you, in Arizona, bird-watching is a \$1.4
 6 billion-a-year activity. Any further fragmentation of
 7 this complex and delicate ecosystem would be highly
 8 detrimental to the quality and continued existence of
 9 this unique habitat.

10 Tucson Audubon, along with other groups,
 11 many of whom you're hearing from today, engaged in
 12 this stakeholder process and cosigned a letter dated
 13 August 3rd, 2018, to ADOT and the Federal Highway
 14 Administration highlighting these concerns and others.
 15 We also welcome the further discussion on the I-19 and
 16 I-10 co-location option. We would be eager to engage
 17 in a process which focuses on innovative
 18 transportation solutions and supporting the local
 19 Tucson economy. Thank you.

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O-38-1	Biologic Resources	GlobalTopic_1, AC-9, BR-6, BR-7 and BR-9
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The Tucson Herpetological Society
 P.O. Box 709
 Tucson Arizona 85702-0709
<https://tucsonherpsociety.org>
 6 July 2019

I-11 Tier 1 EIS Study Team c/o ADOT Communications
 1655 W. Jackson Street
 Mail Drop 126F
 Phoenix, AZ 85007

Subject: Interstate 11 Tier 1 Draft Environmental Impact Statement (DEIS), Nogales to Wickenburg.

Also sent by email to: I-11ADOTStudy@hdrinc.com

The Tucson Herpetological Society (THS) was founded in 1988; its purpose:

- To promote the discovery and dissemination of knowledge concerning the biology of amphibians and reptiles in general and the herpetofauna of the Sonoran Desert and the State of Arizona in particular.
- To encourage conservation of wildlife in general and of amphibians and reptiles in particular.
- To promote public awareness and appreciation of amphibians and reptiles through education.
- To facilitate fellowship among persons of southern Arizona and Mexico with a common interest in herpetology.

The Society, with approximately 200 members, issues a quarterly professional publication, The Sonoran Herpetologist, and is proud to include several active and retired herpetologists with expertise on the reptiles and amphibians (herpetofauna) of southern Arizona and northern Mexico.

In this letter we provide our concerns about the potential impacts of construction of a new freeway through the Avra Valley on amphibian and reptile species (the herpetofauna) and their habitats. We also provide information about special areas of concern along with the currently recommended alternative for an I-11 through the Avra Valley (known in the I-11 Corridor Draft Tier 1 EIS, especially including reference to Section 3.14. Biological Resources as the Green option).

We support the broad and strong concerns about I-11 indicated by the Coalition for Sonoran Desert Protection, notably including connectivity issues between mountain-centered desert preserves. Here we focus primarily on concerns about our special area of interest:

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- Avra Valley and Santa Cruz Flats support high biodiversity of amphibians and reptiles and other desert species, contributing to quality-of-life there and in Tucson generally.
- The “preferred” I-11 route uses mostly natural open space, much of it publicly owned.
- I-11 will therefore cause large-scale destruction and fragmentation of valley habitat.
- This will lead to widespread local population and species extinctions in these valleys.

Details and related concerns are explained below. We attach an annotated list of the species of amphibians and reptiles that are known to inhabit the Avra Valley (Table 1). We have indicated the occurrence of each species as known to us, the predicted impacts of the proposed route of the I-11, and the kind and level of impact expected for each species.

Our position is that to ensure the sustainability of populations of native species and their habitats in the Avra Valley and associated mountains, the I-11 must not be built there. We are most concerned that a freeway, through currently intact habitat, natural open space, publicly owned natural open space, and privately owned natural open space, will not only eliminate a measurable amount of existing habitat but will also fragment populations and their habitats for most of the extant species, not only of amphibians and reptiles but also mammals and invertebrates. Such effects are likely to result in multiple species population losses over large areas, and the overall degradation of species richness and biodiversity.

We have examined the preferred alternative route through the Avra Valley and we see that it is following existing natural open spaces. Thus, it appears that this route, in the Avra Valley region, will result in taking existing native habitat lands while avoiding parcels that have already been partially urbanized. This configuration will diminish the value of the remaining highest quality lands as native species habitat. It will also inhibit successful restoration and ongoing natural ecosystem recovery and regeneration of the numerous and extensive retired agricultural parcels that already are providing habitat for numerous native species.

In examining the maps available we note that the proposed I-11 is shown to pass through a parcel of Bureau of Reclamation land that was established as a mitigation corridor for the Central Arizona Project (CAP). We are firmly opposed to the increased degradation of this parcel as it now exists as a corridor connecting the Tucson Mountain Park with other habitat lands in the Avra Valley and Ironwood Forest National Monument to the west. We realize that some disruption of it already exists. We also recognize that some mitigation can be provided by constructing overpasses and underpasses along a freeway. However even the best designed and deployed set of crossings cannot mitigate against the loss of connection for many species, especially those too small or local in their movements, to travel or disperse over great distances. Only by allowing reasonably large and undisturbed, intact natural habitat to connect larger parcels can we say we have protected the sustainability of our native species and prevented many local extinctions that would result from increased fragmentation. We believe these needs may vastly exceed the scope of mitigation currently under consideration.

We can identify some areas that are most important for protecting the sustainable future of our native species. The central area of Brawley Wash extending north as far as Trico Road is overall a large open space with many species that should be protected. The sand ridge extending

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northwest from Sanders Road along Silverbell Road with much intact Sonoran Desert scrub, supports many desert specialist species that should be protected. The region immediately north of the sand ridge is an affected area that includes the Oro Blanco wash bottom and the margins of Ironwood Forest National Monument extending northward to the Santa Cruz Flats. Development here would create a major barrier to wildlife connectivity between Ironwood Forest (and “points west”) and Picacho Peak State Park, Picacho Mountains, and points north and east. The connectivity is essential to the sustainability of native species. Similarly, we are concerned that much intact Sonoran Desert Scrub will be severely impacted between the cutoff from I-19 west and north into the southern Avra Valley.

The land in the Avra Valley already has been beleaguered by intensive land uses. We expect additional development, but we know that development can be sited in such a way as to maintain habitat and connecting corridors for our native wildlife. What is most concerning from our point of view is that the preferred alternative for I-11 in the Avra Valley region relies almost exclusively on existing natural open space, notably impacting the currently publicly owned natural open space that provides the essential conservation framework for both local species conservation and wildlife corridors.

We believe that no amount or type of mitigation as proposed in the section on Biological Resources can come as close to the habitat protection and species sustainability as co-locating the I-11 along the Tucson corridor of the I-10.

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Even without considering the more extensive impacts we outline here, the Draft Tier 1 EIS repeatedly admits that the route through the Avra Valley, known previously as the Green Option, will cause much more habitat loss, disruption of migrations corridors, and habitat degradation than a route along the I-10 corridor. To select this alternative in spite of all of the clear predictions about species and habitat loss is not in the best interests of a future that includes our native species and their habitats within and near the great metropolitan area of eastern Pima County and southern Pinal County. The future of reconciling urban or suburban development with natural amenities is at stake.

The alternative of enlarging the I-10, through Tucson, is a more viable alternative, a less expensive alternative, and a more appropriate alternative that will keep traffic on routes that are already developed and leave more space to accommodate native habitats and species. This would assure that Arizona will maintain the natural lands that not only protect native species but also provide extensive opportunities for recreation and tourism as economic benefits to the Tucson region

We are concerned as to how the final documents satisfy the existing Pima County Multi-Species Conservation Plan that has been approved by the U. S. Fish and Wildlife Service and the Pima County Board of Supervisors. Please address this.

We are concerned that the I-11 Tier 1 EIS Study Team has not been allowed to consider the use of alternative transportation systems, such as railroad transport, to move goods north and south through this area before deciding on a preferred alternative. Will any entity assess that potential alternative? We think that, before settling on the construction of additional freeways, such an

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choice must be considered. We note that such consideration seems likely to dovetail with consideration of passenger rail service in the Tucson-Phoenix corridor that may have other socially and environmentally significant benefits.

We expect that the Arizona Department of Game and Fish, in possession of a database concerning the current, known distribution of native species, not accessible to the public, will provide a thorough review of the predictable impacts of the I-11 on the native species, natural habitats, and habitat corridors that currently exist in the Avra Valley and in other areas along any proposed new freeway construction. We want to be informed of the results of that analysis.

We thank you for your consideration of these identified issues and we expect that your next report will respond to each of them. In addition to this letter we have also signed the letter from the Coalition for Sonoran Desert Protection, of which we are a member organization.

Sincerely,



Robert A Villa, President

Cc:
 The Coalition for Sonoran Desert Protection: admin@sonorandesert.org
 Avra Valley Coalition: avralleycoalition@gmail.com
 Arizona Sonora Desert Museum, Craig Ivanyi, Director: civanyi@desertmuseum.org
 Richard Spotts, 255 North 2790 East, Saint George UT 84790, raspotts2@gmail.com
 Tucson City Council: jonathan.rothschild@tucsonaz.gov, regina.romero@tucsonaz.gov,
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 Sierra Club Rincon Group Transportation Chair, kbagwell50@gmail.com
 Center for Biological Diversity CBradley@biologicaldiversity.org
 Friends of Ironwood Forest, info@ironwoodforest.org
 BLM Tucson Field Office, Ironwood Forest National Monument, TFOWEB_AZ@blm.gov
 Marana Town Manager's Office, townmanager@maranaAZ.gov

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Table 1. Amphibians and reptiles (herpetofauna, total of 52 species known) of Avra Valley (Robles Junction to Redrock Road), Pima and Pinal counties, Arizona. Coding of threats is: F = Habitat Fragmentation, M = direct road mortality, L-t F = long-term fragmentation of mountain habitat leading to genetic isolation based on small population sizes. Coding of current Status is: A = abundant, C = common, U = uncommon, R = rare, ((Mts) = primarily in desert mountain habitat, Ext = extinct in Avra Valley, NN = non-native.

Group (English Name)	Scientific Name	Threats from Proposed I-11	Current Status in Avra Valley	Urbanization Threats *
Lizards (17 species)				
Sonoran Spotted Whiptail	<i>Aspidoscelis sonorae</i>		U (Mts)	
Tiger (Western) Whiptail	<i>Aspidoscelis tigris</i>		A	
Common Zebra-tailed Lizard	<i>Callisaurus draconoides</i>		A	Fragmentation
Western Banded Gecko	<i>Coleonyx variegatus</i>	F, M	A	Fragmentation
Desert Iguana	<i>Dipsosaurus dorsalis</i>	F	C	Fragmentation
Long-nosed Leopard Lizard	<i>Gambelia wislizenii</i>	F	U	Fragmentation
Gila Monster	<i>Heloderma suspectum</i>	F, M	U (Mts)	Fragmentation
Mediterranean Gecko	<i>Hemidactylus turcicus</i>		NN	
Elegant Earless Lizard	<i>Holbrookia elegans</i>	L-t F	R (Mts)	
Goode's Desert Horned Lizard	<i>Phrynosoma (platyrhinos) goodei</i>	F	Ext?	Fragmentation
Regal Horned Lizard	<i>Phrynosoma solare</i>		C	
Common Chuckwalla	<i>Sauromalus ater</i>	L-t F	R (Mts)	
Clark's Spiny Lizard	<i>Sceloporus clarkii</i>	L-t F	C (Mts)	
Desert Spiny Lizard	<i>Sceloporus magister</i>		A	
Long-tailed Brush Lizard	<i>Urosaurus graciosus</i>	F	R	Fragmentation
Northern Tree Lizard	<i>Urosaurus ornatus</i>		A	
Common Side-blotched Lizard	<i>Uta stansburiana</i>		A	Fragmentation

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Group (English Name)	Scientific Name	Threats from Proposed I-11	Current Status in Avra Valley	Urbanization Threats *
Snakes (23 species)				
Glossy Snake	<i>Arizona elegans</i>	F, M	U	Fragmentation
Banded Sand Snake	<i>Chilomeniscus cinctus</i>	F, M	C	Fragmentation
Tucson Shovel-nosed Snake	<i>Chionactis annulata klauberi</i>	F, M	Ext?	Fragmentation
Western Diamondback	<i>Crotalus atrox</i>		A	
Sidewinder	<i>Crotalus cerastes</i>	F	C	Fragmentation
Black-tailed Rattlesnake	<i>Crotalus molossus</i>	L-t F	C (Mts)	
Mojave Rattlesnake	<i>Crotalus scutulatus</i>	F, M	U	Fragmentation
Tiger Rattlesnake	<i>Crotalus tigris</i>	L-t F	C (Mts)	
Desert Nightsnake	<i>Hypsiglena chlorophaea</i>		C	Fragmentation
Common Kingsnake	<i>Lampropeltis getula</i>		C	Fragmentation
Sonoran Whipsnake	<i>Masticophis bilineatus</i>	L-t F	C (Mts)	
Coachwhip	<i>Masticophis flagellum</i>		A	Fragmentation
Sonoran Coralsnake	<i>Micruroides euryxanthus</i>	F, M	R	Fragmentation
Saddled Leaf-nosed Snake	<i>Phyllorhynchus browni</i>	F, M	U	Fragmentation
Spotted Leaf-nosed Snake	<i>Phyllorhynchus decurtatus</i>	F, M	U	Fragmentation
Sonoran Gopher Snake	<i>Pituophis catenifer</i>		C	Fragmentation
Western Threadsnake (Blindsnake)	<i>Rena humilis</i>		C	Fragmentation
Long-nosed Snake	<i>Rhinocheilus lecontei</i>	F, M	C	Fragmentation
Western Patch-nosed Snake	<i>Salvadora hexalepis</i>		C	Fragmentation
Ground Snake	<i>Sonora semiannulata</i>	F, M	R	Fragmentation
Southwestern (Smith's) Black-headed Snake	<i>Tantilla hobartsmithi</i>		R	Fragmentation
Checkered Gartersnake	<i>Thamnophis marcianus</i>		U	Fragmentation
Sonoran Lyre Snake	<i>Trimorphodon lambda</i>	L-t F	C	Fragmentation
Turtles (2 species)				
Sonoran Desert Tortoise	<i>Gopherus morafkai</i>	L-t F	C (Mts)	Multiple
Sonoran Mud Turtle	<i>Kinosternon sonoriense</i>		U	Desiccation

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Group (English Name)	Scientific Name	Threats from Proposed I-11	Current Status in Avra Valley	Urbanization Threats *
Amphibians (10 species)				
Great Plains Toad	<i>Bufo (Anaxyrus) cognatus</i>		C	Fragmentation
Red-spotted Toad	<i>Bufo (Anaxyrus) punctatus</i>	L-t F	C (Mts)	
Sonoran Green Toad	<i>Bufo (Anaxyrus) retiformis</i>	F, M	Ext?	Fragmentation
Woodhouse's Toad	<i>Bufo (Anaxyrus) woodhousii</i>	M	Ext?	Desiccation
Sonoran Desert (Colorado River) Toad	<i>Bufo (Incilius) alvarius</i>	M	C	Fragmentation
Western Narrow-mouthed Toad	<i>Gastrophryne olivacea</i>	F, M	Ext?	Fragmentation
American Bullfrog	<i>Rana (Lithobates) catesbeiana</i>		NN	
Lowland Leopard Frog	<i>Rana (Lithobates) yavapaiensis</i>		Ext	Desiccation
Couch's Spadefoot	<i>Scaphiopus couchii</i>		A	
Mexican Spadefoot	<i>Spea multiplicata</i>	F, M	R	Desiccation

* Fragmentation threat includes highway barrier and road mortality in all cases

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PETER CHESSON:

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1 Hello. My name is Peter Chesson. I'm the
 2 president of the Tucson Mountains Association, and I
 3 also have credentials as an ecologist. I'm widely
 4 published, with around 120 publications in top-quality
 5 journals, and I'm a professor at the U of A. But I'm
 6 representing the Tucson Mountains Association here.

7 So I hope you've been paying attention
 8 to the press. So what we have seen this last week is
 9 just a continuation of what we've been seeing
 10 recently. That is, the continuing fix of human beings
 11 on nature, the mass extinction that we're causing.

12 So the UN summary, the report of the --
 13 the summary of UN Corps, which was released over the
 14 weekend, indicating a million species at risk. This
 15 is an extraordinary number of species at risk. And
 16 it's not just elsewhere, it's right here in the USA
 17 too.

18 Now, what is it due to? It's primarily due
 19 to human intensification of land use that we've ramped
 20 up over the last several decades. And what we are
 21 doing is, we're taking away habitat, we're degrading
 22 habitat, fragmenting habitat and isolating habitat.
 23 Now, there have been some very rigorous scientific
 24 studies of what happens when you isolate habitat.
 25 Species get lost. Species are lost, some really quite

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1 rapidly, some taking longer times. And it's hard
2 turning back from that.

3 So here we are, talking about putting a route
4 I-11 through the Avra Valley and cutting off the
5 Tucson Mountains. The Tucson Mountains is an
6 extraordinary region here. It has some of the key
7 natural gems of the Tucson region. It has on the
8 order of 700 species of plants and I'm told hundreds
9 of an animals. It's a biological resource that will
10 be seriously harmed by this road. Many species would
11 not be able to move between and in out of areas, and
12 invasive species would become worse.

0-12-1

13 Buffelgrass thrives in certain areas. Let
14 there be no mistake, this corridor, this I-11 freeway
15 would cause massive disturbance. There's no two ways
16 about it, it would do that. And this would provide an
17 extraordinary threat to this gem. So I ask you, you
18 know, how can ADOT and the Federal Highway
19 Administration continue to ignore everything they've
20 been hearing?

21 We don't want the Tucson Mountains isolated.
22 The people of this region don't. We do do want to see
23 the Avra Valley destroyed. ADOT has strong
24 alternatives to the Avra Valley. It doesn't need to
25 go through there. There's no need for more

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1 destruction of nature, no need to spoil the beautiful
 2 valley, and no need to harm the Saguaro National Park
 3 and the Tucson Mountain Park. These are gems of
 4 Tucson, these wonderful parks for citizens.

5 THE MODERATOR: Mr. Chesson, you need
 6 to finish up.

7 MR. CHESSON: These extraordinary
 8 biological resources need to remain extraordinary. So
 9 I ask you, what's the moral case for doing this?
 10 There isn't one. You have no moral case for doing
 11 this. Why must ADOT and the FIT administration
 12 continue to contribute to the massive extinction of
 13 life on Earth? Let there be no mistake, that's what
 14 you would be doing. It does not have to go through
 15 the Avra Valley. There are other alternatives. Your
 16 little mitigations by having wildlife --

17 THE MODERATOR: Thank you. We have
 18 others who are waiting to speak.

19 MR. CHESSON: Okay.

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The Tucson Mountains Association

- O-42-1

Human intensification of land use is causing a mass extinction worldwide. This is the message of the UN report on Biodiversity and Ecosystem Services. Wherever, we look, whether overseas or in the USA, ever more species are in decline and are threatened with extinction. Let there be no mistake, the primary cause is us. We are taking away habitat, degrading habitat, fragmenting habitat, and isolating habitat.

And here we are talking about freeway through the Avra Valley. It would be a huge mistake, because of the habitat destruction that it would cause, the land use changes in a beautiful natural valley, and the isolation of habitats that it would cause.

Habitats that become isolated lose species. They lose some species quickly, but others take a long time. This proposed I-11 route through the Avra Valley would cut off the Tucson Mountains. They would be totally surrounded by roads and development. This is where some key natural gems of the Tucson region are. The Tucson Mountains are an extraordinary biologically rich mountain range. They have the order of 700 species of plants. And untold numbers of animals live there too. This biological resource would be seriously harmed by this road. Many species would not be able to move between it and other places. Invasive species would become worse. Buffel grass thrives in disturbed areas. How would we ever deal with this extraordinary threat to this gem of an ecosystem?

How is it that ADOT and FHWA can ignore what they have been hearing in the all the various meetings on I-11? The people here do not want it to go through the Avra Valley. We do not want the Tucson Mountains isolated. We do not want to see the Valley destroyed.
- O-42-2

ADOT and FHWA have some strong alternatives to the Avra Valley, including not building this freeway, or building it along the existing I-10 and I-19. There is no need for more destruction of nature. No need to spoil the beautiful Avra valley, no need to harm the National Park and the Tucson Mountain Park. Let these gems of Tucson, these wonderful parks for the citizens, these extraordinary tourist attractions, and their extraordinary biological resources, remain extraordinary.
- O-42-1

What is the moral case for continuing to destroy nature? There is none. In fact, there is a strong moral case against it.

Why must ADOT and Fed highway admin contribute to the mass extinction of life on Earth? Why must it put this freeway through the Avra Valley. It does not have to, and if we are not going to have a much impoverished earth, the place to start is by not deliberately choosing to destroy nature, to destroy habitat, when it is so easy to make a different choice as it is here. If I-11 is to be built, it does not have to go through the Avra Valley. Putting it through there is wanton destruction.

What is the response of ADOT and FHWA? Some wildlife crossings and some stretches of highway with no off ramps. These are just tokens. Better than nothing, but much worse than not having this highway. If you want to keep the area for free movement of wildlife, elevate the whole freeway, and stop development following it by having no off ramps between major cities. But even these measures do not get rid of the disturbance from its construction, do not get rid of noise, light pollution, and air pollution from this highway. And the Valley remains visually scarred. The case is clear, do not build it in the Avra Valley or any other natural area.

O-42-1	Biologic Resources	GlobalTopic_1 and BR-7
O-42-2	No Build Alternative	GlobalTopic_4 and GlobalTopic_1

ID	Comment Document
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ID	Topic	Response
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O-8-1	Recreation	GlobalTopic_4 and GlobalTopic_1, LU-3
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University of Arizona Cycling

O-8-1

We're writing to oppose the I-11 options (all of them) for not only the environmental impact they would bring on the Sonoran Desert, Saguaro National Park, and Ironwood National Forest but also the impact on cycling in our region. While we are deeply concerned about the effects of I-11 on the natural environment, which would largely sever wildlife connectivity to the west of the aforementioned resources, it would have a drastic impact on the quality of cycling in the region. The Tucson region is one of the top cycling destinations in the country, bringing in millions of dollars annually due to visiting recreational and professional riders. I-11 would ruin riding to the west and south of Tucson. Numerous routes utilize Sandario, Manville, Amway, and Avra Valley roads-many of which would become inaccessible with the freeway.

Additionally, the proposed route crosses Mission road south of Helmet Peak- this road is utilized by hundreds of riders each Saturday on the nationally known Shootout ride. The loss of these routes, especially the Shootout, would have a dramatic impact on the quality of riding in Tucson and our ability to attract cyclists to our region. Additionally, we are well aware that sprawl development follows freeway construction- especially in flat areas such as the Avra Valley and west of Mission Road. This sprawl would put an end to cycling to the west and south of Tucson. Tucson is known for quiet desert roads, stunning vistas, and pristine desert- let's keep it that way. Cosign I-11 on the 8, 10, and 19. Research shows millennial, and generation Z are driving less and value transit more- so let's invest in those technologies to make our region more efficient!

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ID	Topic	Response
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WESTMARC



6751 N. Sunset Blvd., Suite 210
Glendale, AZ 85305

Tax ID: 86-0666418
(623) 435-0485
westmarc.org

July 8, 2019

Arizona Department of Transportation
1655 W Jackson Street
Phoenix, AZ 85007

I-11 Tier 1 EIS Study Team:

O-48-1

I am writing on behalf of WESTMARC, the Western Maricopa Coalition, representing the 15 communities in the West Valley of Metro Phoenix. WESTMARC is focused on enhancing economic development and job creation in the West Valley to provide a high quality of life for our residents.

Significant infrastructure investments in this region over the past 20 years has allowed the West Valley grow with quality homes, jobs and entertainment options. This will be true of the I-11 project area and therefore WESTMARC encourages further advancement in planning and ultimately construction of this project.

West Valley municipalities plan transportation infrastructure to connect and accommodate projected population and commerce centers to both serve residents and grow the local economy. Therefore, over the past several years, West Valley municipalities, MAG, MCDOT, ADOT and local landowners have been highly and consistently engaged in regional and statewide discussions on the I-11 project to ensure planning and financial decisions were made accordingly. Many decisions were made in accordance the Hassayampa Framework study, further driving municipal General Plan adoption.

O-48-2

In reviewing the Draft Tier 1 Environmental Impact Statement and Preliminary Section 4(f) Evaluation, the Purple Alignment inclusive of Option X will provide a high-priority, high-capacity, access-controlled transportation corridor to serve the planned 300,000 residents in Douglas Ranch alone and over 1,000,000 in the surrounding area. Infrastructure investments in close proximity to future resident and job centers will not only increase economic vitality in this region but will also result in pavement preservation in the region by keeping job commutes to a minimal.

For this reason, WESTMARC urges ADOT to continue to the planning process with the inclusion of Option X toward the Final Environmental Impact Statement.

Sincerely,

Sintra Hoffman
President & CEO, WESTMARC

O-48-1	Support	GlobalTopic_4
O-48-2	Land Use	GlobalTopic_4

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Wild Arizona

July 8, 2019

To Whom it May Concern:

Thank you for the opportunity to comment on the I-11 Draft Tier 1 EIS, Nogales to Wickenburg.

We submit these comments on behalf of Wild Arizona and its members. Wild Arizona fully supports and incorporates here by reference the extensive comments submitted on July 4, 2019 by the Coalition for Sonoran Desert Protection, strongly opposing the Recommended Alternative route in the Draft Tier 1 EIS. Our organization and its members are especially concerned about the damage to wild lands, natural waters, and riparian areas that serve as important core and connectivity habitat for Southwest wildlife, as well as wild landscapes and open space for human-powered outdoor recreation, outdoor education, and ecological research. Many such areas would be unnecessarily and directly damaged, including being further fragmented by the Recommended Alternative route.

O-55-1

As a statewide conservation organization we are additionally strongly opposed to the Recommended Alternative route through Maricopa County to Wickenburg, north of Pima County. We participated in and contributed to the multi-stakeholder (see list of partners here: <http://mymountainparks.org/about-us/alliance-partners/>) Regional Open Space Strategy for Maricopa County (ROSS) and the Natural Infrastructure Viewer (the Greenprint) maps. An analysis based on overlaying the Recommended Alternative route with the Ensure Habitat Integrity map demonstrates extensive negative impacts to areas identified in the mapping and planning as important wild lands and connectivity habitat, vital to open space conservation values and therefore to the residents of and visitors to Maricopa County. The Ensure Habitat Integrity map is also included by reference in our comments and uploaded here as a pdf.

We appreciate the opportunity to comment, and to advise inclusion and thorough analysis of the many detailed regional conservation plans developed through extensive public engagement along the Recommended Alternative route. In summation, we strongly oppose the Recommended Alternative.

Sincerely,

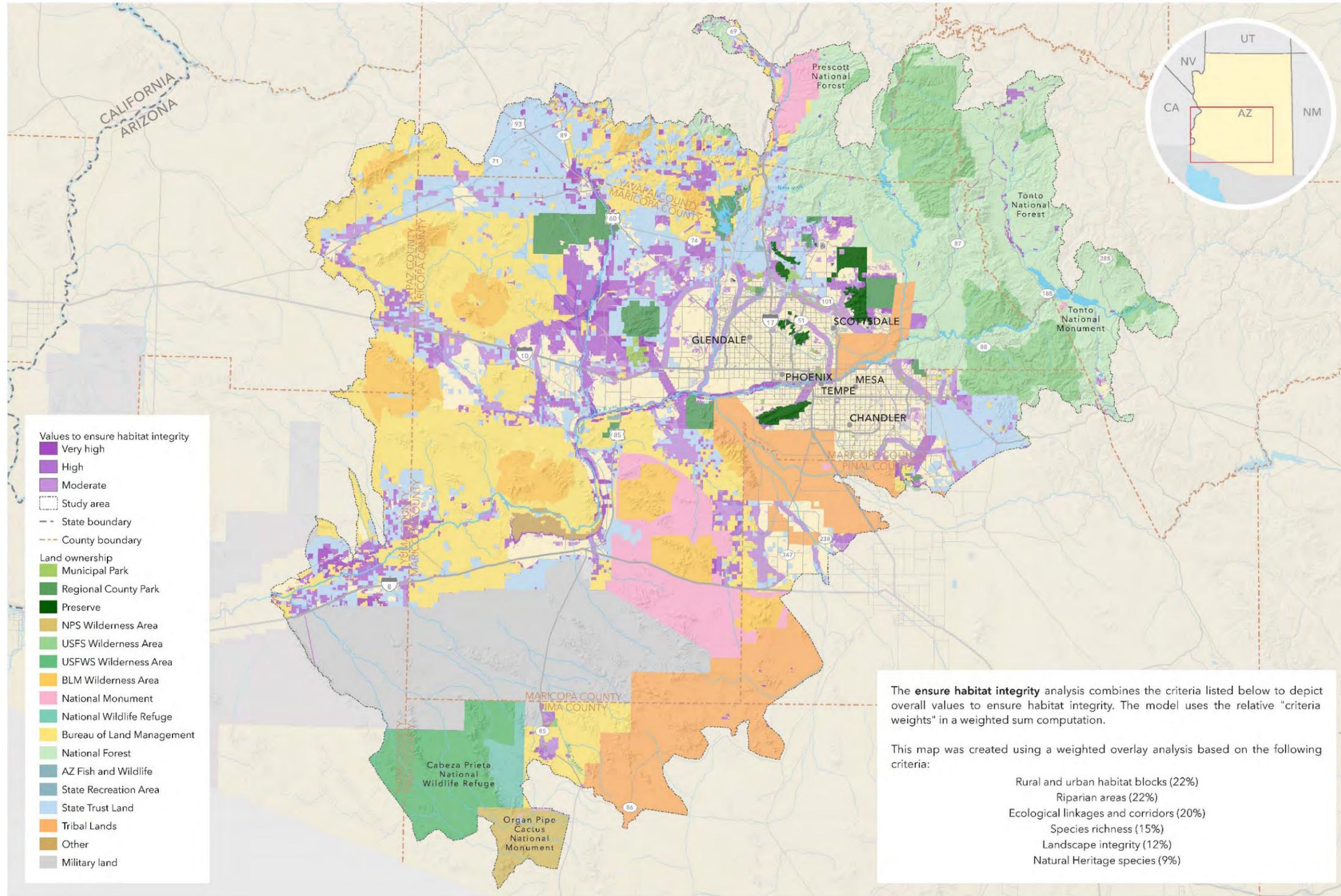
Kelly Burke
Executive Director, Wild Arizona

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O-55-1	Recommended Alternative	Thank you for your input and interest in the I-11 Corridor Tier 1 EIS. FHWA and ADOT value the feedback on the Draft Tier 1 EIS provided by your organization. GlobalTopic_4, GlobalTopic_1 and BR-2
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Comment Document



Ensure habitat integrity

CENTRAL ARIZONA CONSERVATION ALLIANCE (CAZCA)

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Wildlands Network
300 East University Blvd Suite 264
Tucson, AZ 85705

Interstate 11 Tier 1 EIS Study Team
c/o ADOT Communications
1655 W. Jackson St., MD 126F
Phoenix, AZ 85007

RE: Comments on the Interstate 11 Tier 1 Draft Environmental Impact Statement, Nogales to Wickenburg

O-41-1 **Wildlands Network opposes the Recommended Alternative route identified in the I-11 Tier 1 DEIS.** The Recommended Alternative for I-11 would have significant environmental impacts to the region. The route would severely fragment protected lands and conservation areas and impact existing wildlife corridors between Ironwood Forest National Monument, Saguaro National Park and Tucson Mountain Park. Additionally, from a fiscal and transportation perspective, Recommended Alternative is 7 miles longer than using the existing I-10 and I-19 routes (see Figure 1).

O-41-3 The Recommended Alternative for I-11 would have significant environmental impacts to the region.

- Impacts to federal lands such as Saguaro National Park, Ironwood Forest National Monument, and the Bureau of Reclamation’s Central Arizona Project Mitigation Corridor.
- Impacts to local conservation lands such as Tucson Mountain Park and the Pima County Conservation Lands System.
- Impacts to planned mitigation lands for Pima County’s Incidental Take Permit and Multi-Species Habitat Conservation Plan, which was finalized in October 2016 and is now being actively implemented, along with planned mitigation lands for an Incidental Take Permit submitted by the City of Tucson to the U.S. Fish and Wildlife Service in 2014 (currently under review).

O-41-4 • Impacts to critical wildlife linkages and connectivity between large wildland blocks as described in the 2006 Arizona’s Wildlife Linkages Assessment (completed by a diverse group of statewide stakeholders) and the 2012 Pima County Wildlife Connectivity Assessment (conducted by the Arizona Game and Fish Department (AGFD)), including the Coyote-Ironwood-Tucson Wildlife Linkage and the Ironwood-Picacho Wildlife Linkage.

- O-41-5 • Impacts to increasingly rare riparian habitat.
- O-41-6 • Impacts to an unknown number of rare archaeological sites.
- Impacts to Tucson Water’s CAP water recharge facilities in Avra Valley, groundwater, and surface water, including inevitable spills from trucks carrying gases, dangerous chemicals, petroleum products and other toxins that will contaminate the regional

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O-41-1	Recommended Alternative	GlobalTopic_1, BR-4, BR-9, BR-10
O-41-2	NA	No response needed
O-41-3	Recreation	GlobalTopic_1 and BR-9
O-41-4	Biologic Resources	GlobalTopic_1 and BR-10
O-41-5	Cultural Resources	GlobalTopic_1 and CR-1
O-41-6	Water Resources	GlobalTopic_1, WR-1, WR-2 and WR-3

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- O-41-6 aquifer serving drinking water to a major metropolitan area, including water banked by Metro Water, Marana, Tucson, Oro Valley, and Phoenix.
- O-41-7
 - Impacts to Tucson’s businesses and economy and its position as an international port and center for commerce and logistics, including impacts to tourism powerhouses such as Saguaro National Park and the Arizona-Sonora Desert Museum.
 - Impacts to established and long-standing rural communities and private property owners in Avra Valley and surrounding areas.
 - Increasing the risk of devastating wildfires, given the extensive buffelgrass infestation present in Avra Valley.
- O-41-8

Impacts to Wildlife Linkages

The Recommended Alternative route would sever critical wildlife linkages that have been identified for protection by state and local agencies through various planning processes. Pima County’s Sonoran Desert Conservation Plan, a nationally recognized regional conservation plan developed and implemented over the last 19 years, identifies a Critical Landscape Connection across the Central Arizona Project canal in Avra Valley. The Arizona Wildlife Linkages Workgroup identified three wildlife linkage corridors that fall within the I-11 Recommended Alternative. More recently, AGFD’s 2012 Pima County Wildlife Connectivity Assessment identified and modeled the Coyote-Ironwood-Tucson Wildlife Linkage Design, included Avra Valley. The Recommended Alternative route would also sever the Ironwood-Picacho wildlife linkage.¹ The three linkages of specific interest to this section of the route are listed below.

O-41-9 In general, severed wildland blocks create isolated wildlife populations, which then become more susceptible to extinction than connected populations. Connectivity is also necessary for wildlife to move across the landscape as they attempt to adapt to rapidly changing habitat conditions driven by climate change. The impact of a massive linear feature, such as a new highway severing important movement areas, valley wide, for wildlife, cannot be adequately mitigated off-site. This is especially true in the Tucson Mountains, home to Saguaro National Park and Tucson Mountain Park. Scientists are becoming increasingly concerned about the isolation of this wildland block as development pressures increase from the east and north. The Recommended Alternative route would only further cement the total isolation of wildlife that live in the Tucson Mountains. This would result in devastating and irreversible consequences for wildlife diversity, genetic health, and overall ecosystem resilience in this area.

¹ Arizona Wildlife Linkages Assessment: <https://www.azdot.gov/business/environmental-planning/programs/wildlife-linkages>

Pima County Wildlife Connectivity Assessment: http://conservationcorridor.org/cpb/Arizona_Game_and_Fish_Department_2012-Pima.pdf

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O-41-7	Economics	GlobalTopic_1 and E-1
O-41-8	Biologic Resources	GlobalTopic_1 and BR-1
O-41-9	Biologic Resources	GlobalTopic_1, BR-4, BR-6, BR-7 and BR-9

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Arizona Wildlife Linkages Affected by the Recommended Alternative.

L25. Brawley Wash/Avra Valley across CAP Canal Wash Siphon to Saguaro National Park (West)

Area Connected: Brawley Wash Riparian Movement Area – Saguaro National Park (West) Species Identified: None listed Current Threats/Barriers: Canal (Central Arizona Project canal); Land ownership Notes: This linkage uses an official wildlife crossing per Central Arizona Project operations and maintenance agreement (C3). This linkage travels mostly through State Trust and private lands.

L26. Saguaro National Park (West) across buried CAP Canal Pipeline to Avra Valley

Area Connected: Saguaro National Park (West) – Avra Valley Species Identified: Mountain lion Current Threats/Barriers: Low density residential development; High density residential development; Wind energy development Notes: Though the area within this linkage is developed, it is the only area adjacent to the park where the Central Arizona Project canal is underground (C2) and an ideal place for a wildlife crossing. Numerous organization/agencies support this linkage. This linkage is largely within private land.

L27. CAP Wildlife Mitigation Corridor: Roskrige Mountains to Tucson Mountains

Area Connected: Roskrige Mountains Wildland Block & Tohono O’odham Nation (Garcia Strip) – Saguaro National Park (West) Species Identified: Bobcat; Mountain lion Current Threats/Barriers: Powerline (proposed SunZia); Paved road (ADOT proposed I-10 Bypass) Notes: This linkage was digitized based on land ownership and is completely within U.S. Bureau of Reclamation Central Arizona Project wildlife mitigation corridor. U.S. Bureau of Reclamation owns the corridor and Pima County Natural Resources, Parks and Recreation. This linkage contains numerous unofficial wildlife crossings per Central Arizona Project operations and maintenance agreement (C3).

Impacts to at-risk species

The Recommended Alternative route would negatively impact a range of specific wildlife species and especially those classified as federally “endangered” or “threatened,” those identified by the state of Arizona HabiMap (www.habimap.org) as “species of conservation concern or species of economic and recreational importance,” and those identified by Pima County and FWS as “vulnerable” under the SDCP and ITP. Some of these species include, but are not limited to:

- Aberts towhee
- Bell’s vireo
- Western burrowing owl
- Cactus ferruginous pygmy-owl

O-41-9

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O-41-9

Western yellow-billed cuckoo
 Swainson's hawk
 Rufous-winged sparrow
 Giant spotted whiptail
 Tuson shovel-nosed snake
 Pima pineapple cactus
 Nichol turk's head cactus
 California leaf-nosed bat
 Mexican long-tailed bat
 Pale Townsend's big-eared bat
 Lesser long-nosed bat
 Merriam's mouse
 Jaguar
 Ocelot

Due to the above impacts described, Wildlands Network strongly opposes the construction of a new Interstate Highway 11 through the Avra Valley. The environmental impacts will be severe and contribute to habitat fragmentation and have an adverse effect upon wildlife populations. The fact that Recommended Alternative is 7 miles longer than existing highway routes raises serious questions about the perceived efficiency of such a project.

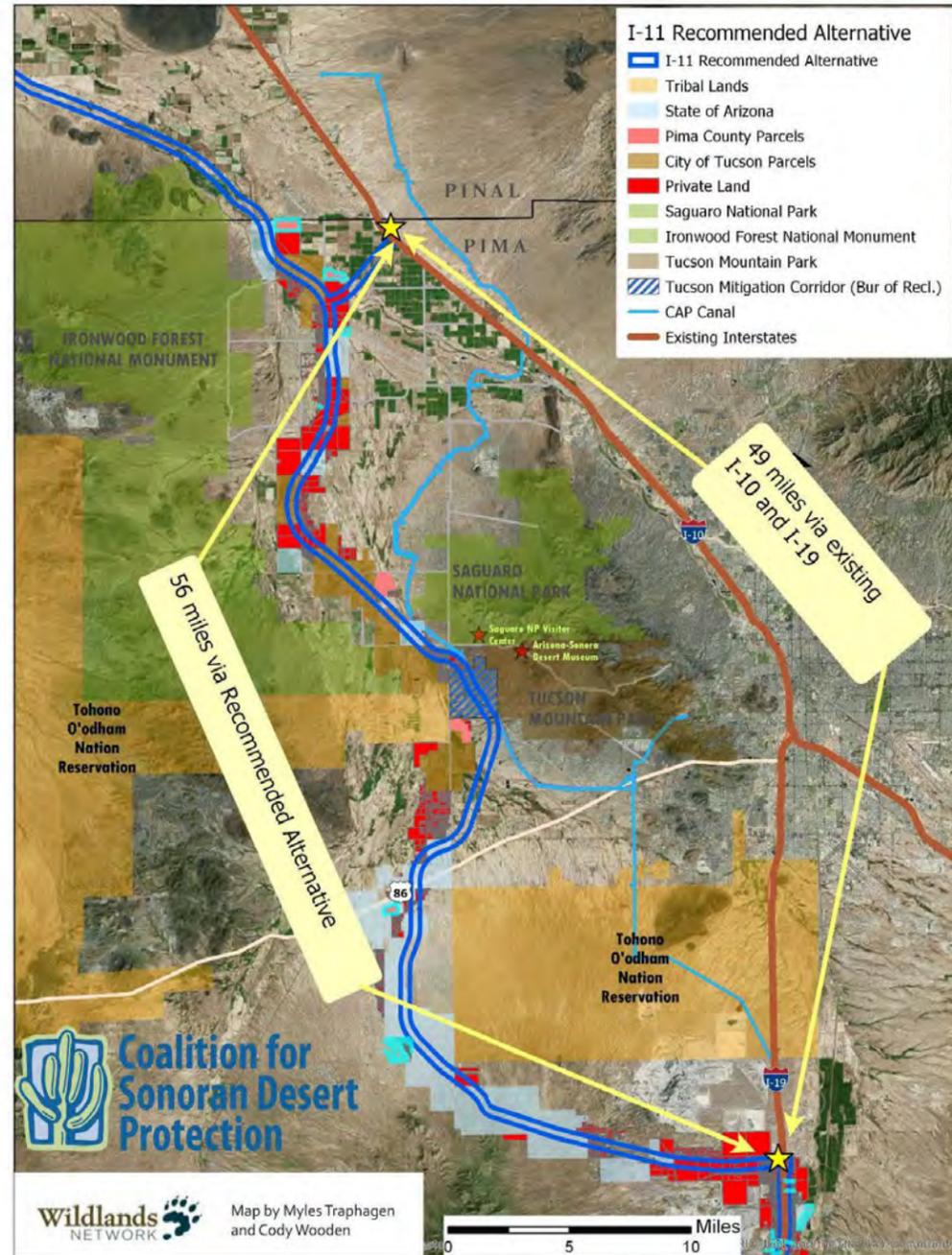
Sincerely,

Myles Traphagen
 Borderlands Program Coordinator
 Wildlands Network

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Figure 1. Increased Mileage of Recommended Alternative



ID	Comment Document
	Tucson Public Hearing, May 8, 2019

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O-18-1	Biologic Resources	GlobalTopic_1, GlobalTopic_4 and BR-2

O-18-1

3 MILES TRAPHAGEN:
 4 Thank you for the opportunity here. My name
 5 is Miles Traphagen. I'm the Borderlands program
 6 coordinator for Wildlife Network. This is a
 7 nongovernmental organization that advocates for
 8 wildlife corridors and productivity all throughout
 9 North America.
 10 Wildlife Network is firmly opposed to the
 11 project, and this includes the purple alternative and
 12 the green alternative, which is anything but green,
 13 and I'll go through why we're opposed to this.
 14 A lot of people have talked about the
 15 fragmentation that would occur between a lot of
 16 protected areas, such as Saguaro National Park,
 17 Ironwood National Monument, the Tucson Mountains and
 18 many other lands owned by the county.
 19 Once you fragment an area with a highway --
 20 and highways are notorious for being one of the
 21 largest killers of wildlife on the planet -- there's
 22 really not much going back. You can't put in wildlife
 23 ad hoc. You can't really undue the damage of a
 24 highway. And with 200 million kilometers of highway
 25 being projected to be built over the next century

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1 across Earth, we simply can't afford a major land-use
 2 project like this, especially when it's really not
 3 needed.

4 Several people have mentioned the effects of
 5 buffelgrass, and this is real. I was a rangiologist
 6 for ten years. I worked throughout the grapevines in
 7 Mexico, the borderlands, and I've seen the invasive
 8 species. Buffelgrass is real. I worked a lot Sonora.
 9 Just last week I was down there, and there was a huge
 10 wildfire, with flames that I couldn't believe. There
 11 was a house, or structure on fire, and it turns out
 12 that was just a field of buffelgrass.

O-18-1

13 So you know, this is a threat to our Sonoran
 14 Desert ecosystem, which Tucson and this area prizes
 15 and loves. It's iconic. The entire world, when they
 16 see the Saguaro cactus, they know it's Arizona. And
 17 this contributes a lot to what we love about this
 18 landscape.

19 But I'd like to just talk about the practical
 20 side of things. I advocate for nature every day. So
 21 I'm going to get off my nature soap box, and I'm going
 22 to talk about the practical values. If you look at
 23 the preferred alternative, from the Pima County line
 24 or Marana or the Pinal County line, it's 55 miles of
 25 new freeway at \$3 million.

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O-18-1

1 If you look at the orange alternative, it's 45
 2 miles to where it connects at the same point in
 3 Sahuarita. Now, I'm not a mathematician, but 45
 4 versus 55 is a pretty big difference. So I'm just
 5 wondering, how are we saving on this? If you go north
 6 from the Pima and Pinal County lines to Arizona City,
 7 we will pave over 10,000 acres of agricultural land.
 8 I really don't see the net gain for this. Thank you.

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