Neal, D I-3510

7-3-2019 How many year's, How many meeting's, How many time's do we have to tell you we do not want I-II in our back yard's or our Home's being taken ! So let me pat it this way, how much money from Tax paying family's are you going to lose, when you distroy there Home's? How much money are the School's going to lose when the family's have to move? How much money are you going to lose from the tourist that come here to see the Arizona-Sonora Desert Museum, Old Tucson, / WIDE OPEN SPACES, Not a Highway I have lived here when you could ride a horse from the Tucson Mountain's to the Silverbell's, put up with the Noise + Construction of the C.A.P. west of my house, I pay tay's on but do not use. What happen to the equestrian trail's that was to be built beside it? or the lake that was to be put in the west side of the C.A.P.? More lies to get thing's clone There is a Bronze Plack at Red Hill's Visitor Center? The Land is something Worth of Respect Something to be Treated Gently Some thing to be Cared For Morris Udall - U.S. Congress 1961-1991 you all could learn something from his Word's Jonna M. Noel 6991 N. Calvin Rel



Nogales to Wickenburg

COMMENT FORM

Thank you for participating in the I-11 Draft Tier 1 Environmental Impact Statement public comment process.

The Arizona Department of Transportation (ADOT) and the Federal Highway Administration (FHWA) encourage all interested parties to submit comments on any aspect of the Draft Tier 1 EIS. ADOT and FHWA will consider all comments in preparing the Final Tier 1 EIS, which will include responses to all comments received during the Draft Tier 1 EIS comment period, and will identify a Preferred Alternative (either a Build Alternative or the No Build Alternative).

When submitting comments, please be as specific as possible and provide details on your concerns and recommendations.

It is helpful to ADOT and FHWA to receive comments on:

- Any alternative or mitigation measure you support or oppose and why
- The analysis of environmental impacts and performance of alternatives
- Information you believe is incomplete
 or incorrect

Please print your comments below	Comments must be received	or postmarked by July 8, 2019.
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THIS IS A	GREAT DEAL
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not discriminate on the basis of race, color, national origin, sex	ans with Disabilities Act (ADA) and other nondiscrimination laws and authorities, ADOT does x, age, or disability. Persons who require a reasonable accommodation based on language or lations Project Manager, at 602.712.7683 or Idouglas@azdot.gov. Requests should be made as dress the accommodation.
有关中文信息,请致电 1-844-544-8049.	
	CONTACT
	mmunications • 1655 W. Jackson Street, Mail Drop 126F • Phoenix, AZ 85007 IE: 1-844-544-8049 (Toll-free/bilingüe) WEBSITE: i11study.com/Arizona
U.S. Department of transportation	ADOT Project No. 999 SW 0M5180 01P Federal Aid No. 999-M(161)S

July 8, 2019

To whom it may concern,

Please do not use the recommended alter native route described in the TherI DEIS for interstate II. Not only is this an abuse of power over the use of public lands but will have far reaching impacts to the local economy.

The encroachment on the rights of those who own property in the area will have a negative offect not only on property values but also to tourism and research conducted in the area on wildlife and at the observatory.

Jor I-11. As a public servant, it is your job to listen to constituents in your district. Please do your job and listen to our concerns.

> Sincerly, Heather Numic

Pastmarked 7-18-19

April 18, 2019

2609 E. Waverly St.

Tucson AZ 85716

I-11 Tier 1 EIS Study Team

c/o ADOT Communications

1655 W. Jackson Street, Mail Drop 126F

Phoenix, AZ 85007

Dear Study Team,

I am writing concerning the proposed I-11 Corridors. While I do not see the need to construct, nor even contemplate this new freeway, I would like to share comments on the recently Recommended Alternative.

IF a new 'truck route' is developed, it should definitely be the ORANGE Build. This option follows existing freeway routes. In using existing routes it disturbs open land less. Arizona already suffers from expansive growth of cities and suburbs, at the cost of rural lifestyles and natural areas for wildlife. New construction amplifies the spread of fire-vector invasive grasses, which the Arizona Department of Transportation is already spending millions of dollars on along the right-of-ways.

In addition to the fact that no one in southern and central Arizona that I have spoken with favors routes through San Pedro or Avra Valley, as these are relatively undisturbed rural areas, we are perplexed by the fact that ADOT has selected a preferred route - through Avra Valley - which according to your study would cost 3 billion more than the Orange route. As a taxpayer, we do not comprehend: the route that no one wants, that cost more, is the preferred route.

Would it be possible to respond to this letter with an explanation?

Thank you for your attention,

Jorega Maesman

Sonya Norman

Sonya Norman 2609 E Waverly St Tucson, AZ 85716

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PHOENIX AZ 852

20 APR 2019 PM 10 L



85007-327999

Nol

Laura Olivas 22811 W Solano Dr. Buckeye, AZ 85326

May 31, 2019

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

Dear Study Team:

I am humbly writing in response to the call for comments regarding the I-11 DRAFT TIER 1 EIS. As a private citizen and Arizona native I would like to voice my concerns regarding this proposed project. I have many concerns that seem to be similar to the Arizona Game and Fish agency, who are in opposition to the I-11 project. The concerns are apparent it seems, the destruction of miles of wilderness areas would further stress the extremely delicate eco-system and wildlife of the desert. The Saguaro National Park and the Sonoran Desert National Monument east of Gila Bend are areas that may be impacted. Another major concern is the human displacement, from small communities on the proposed route. The impact on Native American reservation and traditional lands may be considered a form of encroachment due to the close proximity of I-11. The Avra Valley water rights and water supply to Tucson is an additional consideration.

I recently began traveling monthly from Buckeye to Tucson. The I-10 alternates dangerously from 2 to 3 lanes, several times on the route from metro Phoenix to Tucson. It is *dangerously* congested at times (a family member was in a near fatal accident where the I-10 narrows abruptly to 2 lanes south of Phoenix last year). This route is being widened incrementally and this is long overdue. Until the full funding and completion of an optimal I-10 Phoenix to Tucson route is made, the consideration of I-11 should be postponed and then re-evaluated.

To avoid heavy Phoenix metro traffic rush hours, I also choose to take state Route 87 from Buckeye to Gila Bend/I-8, connecting to the I-10/Casa Grande, to Tucson. In my experience, this is a good alternate route with normally less traffic. This existing route could be developed for higher capacity and undoubtedly less cost, than creating new freeway that further divides and disrupts the Sonoran desert ecosystem and wildlife corridors.

Thank you for your consideration.

Sincerely,

Laura Olivas



I-11 DRAFT TIER 1 ENVIRONMENTAL IMPACT STATEMENT AND PRELIMINARY SECTION 4(f) EVALUATION (DRAFT TIER 1 EIS)

Nogales to Wickenburg

COMMENT FORM

Thank you for participating in the I-11 Draft Tier 1 Environmental Impact Statement public comment process.

The Arizona Department of Transportation (ADOT) and the Federal Highway Administration (FHWA) encourage all interested parties to submit comments on any aspect of the Draft Tier 1 EIS. ADOT and FHWA will consider all comments in preparing the Final Tier 1 EIS, which will include responses to all comments received during the Draft Tier 1 EIS comment period, and will identify a Preferred Alternative (either a Build Alternative or the No Build Alternative).

When submitting comments, please be as specific as possible and provide details on your concerns and recommendations.

It is helpful to ADOT and FHWA to receive comments on:

- Any alternative or mitigation measure you support or oppose and why
- The analysis of environmental impacts and performance of alternatives
- Information you believe is incomplete
 or incorrect

Please print your comments below. Comments must be received or postmarked by July 8, 2019.

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Pursuant to Title VI of the Civil Rights Act of 1964, the Americans with Disabilities Act (ADA) and other nondiscrimination laws and authorities, ADOT does not discriminate on the basis of race, color, national origin, sex, age, or disability. Persons who require a reasonable accommodation based on language or disability should contact Laura Douglas, ADOT Community Relations Project Manager, at 602.712.7683 or Idouglas@azdot.gov. Requests should be made as early as possible to ensure the State has an opportunity to address the accommodation.

State 🏼

有关中文信息,请致电 1-844-544-8049.

City V

CONTACT

MAIL: I-11 Tier 1 EIS Study Team • c/o ADOT Communications • 1655 W. Jackson Street, Mail Drop 126F • Phoenix, AZ 85007 EMAIL: i-11ADOTStudy@hdrinc.com | PHONE: 1-844-544-8049 (Toll-free/bilingüe) | WEBSITE: i11study.com/Arizona



ZIP

Dear ADOT,

OlsenMikitowicz, V I-3518

As a resident of Turson and active voter, hiker, and Tucson enthusiast, I oppose the recommended alternative route described in the Tier I DEIS for Interstate II. The Recommended Alternative route would cause irreversible damage to the natural resources of the surrounding area - public lands that other a unique and aire inspiring landscope That is the very beating heart of Tucson. No one comes to Tucson without wanting to wave at a great and towering saguaro. And if opposing the Recommended Alterative route for the Sale of the Saguaro's own intrinsic value is not enough of a Motivator, shame on you, but there are economic incentives as well. Downtown Tucson, the AZ-Sonora Descrit Messeum and Saguaro National park would see reduced revenue and negative economic impact. The recommended Alturnatione route would course significant noise, air and Cight pollution Cin on orea reknown for dorksky) and Cight pollution Cin on orea reknown for dorksky) and encourage urban sprawl. As a society we hold value to this area tha transiend the stricture hold value to this area tha transiend the stricture of the market. Stand Strong to protect this area,

it is precious, an inestimable treasure Mikitowicz, N provides essential assets - at micro and macro scale.

As a public servant, stand against the Recommended Alternative route. Do what is right for our City, environment and all thet Moral for the greater good.

Sincerely, Victoria Obsen-Mikitowicz 1628 TE. Coppur St. Tucson, AZ 85719

Estrella Mountain Ranch Developers, LLC 5090 N. 40th Street, Suite 210 Phoenix, Arizona 85018

July 8, 2019

Sent Via: U.S. Mail and Electronic Mail I-11ADOTStudy@hdrinc.com

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

Re: Estrella Mountain Ranch Developers, LLC (Estrella) - Comments on I-11 Draft Tier 1 Environmental Impact Statement and Preliminary Section 4 (f) Evaluation (Draft Tier 1 EIS) Nogales to Wickenburg dated March 2019

Dear Interstate 11 Tier I EIS Study Team:

Newland Real Estate Group, LLC, as Development Manager for Estrella Mountain Ranch Developers, LLC, would like to put on record its preference for the Recommended Corridor Alternative for Interstate 11 alignment, as reflected in attached **Appendix A** Figure 6-4 Recommended Alternative, which is attached hereto and made a part hereof by this reference, which generally has the same alignment with the proposed SR303L, subject to specific clarifications below.

- First, that Interstate 11 alignment will be situated upon or further west of the westernmost four hundred feet of the 2000 foot corridor near the Willis Road and Rainbow Valley Road intersection alignment per attached Appendix A2 to allow adequate buffer between Interstate 11 and the numerous residential developments along Estrella's west and south boundary including of CantaMia (~1,700 total dwelling units) and Montecito Phase 3 (~2,200 total dwelling units) in the Estrella master planned community.
- Second, that the I-11 should follow the alignment of the SR303L corridor as included in The Goodyear General Plan which was approved by the Goodyear voters in November 2003 and has been identified in numerous transportations studies conducted by the Maricopa Association of Governments. The city Land Use and Transportation Plan is attached as **Appendix C**).
- 3. Third, we ask that ADOT recognize that the Estrella master planned community, initiated development in 1985, constitutes roughly 32 square miles or nearly 20% of the City of Goodyear's land area at ~22,000 acres of combined land just west of the Estrella Mountains and has worked hand-in-glove over the years with the city of Goodyear, ADOT, MAG and other stakeholders on the SR303L and the I-11 Corridors to support Goodyear's growth plans for expansion into the southern area of the city.

- 4. Fourth, please recognize that Estrella is expected to provide a total of approximately 51,000 residential units (approximately 144,000 residents [using an average household size of 2.82; Estrella Strategic Plan December 31, 2006] and is anticipated to create 51,644 jobs. At present, Estrella is home to approximately 16,000 residents. Estrella is anticipated to help in realizing the city's vision for a resilient and diversified economy by providing an opportunity for locally based employment and economic opportunity, and serve as a home to an educated and healthy workforce. Estrella master planned community provides a well-connected roadway network, and aims to provide an efficient multimodal transit system and options for other modes of travel. The development potential of the Estrella community is directly linked to the future SR 303L South Extension and Interstate 11 Trade Corridor going through this area.
- 5. Fifth, the master land plan for Estrella (Appendix B Land Use Plan) was developed in the early 2,000's with the assumption that the future SR 303L South would cross the Gila River and remain west of the Estrella community and then traverse to the east through Estrella between the Germann Road and Queen Creek Road alignments as shown in Appendix B. The key theme of the strategic development plan for the community identified four activity centers within the community, with the future freeway corridor providing access to these centers of business and commerce. The freeway corridor would provide opportunities for local and regional economic development. This plan for Estrella was developed in coordination with the city of Goodyear, and the city agreed with the importance of connected activity centers when it adopted the Estrella master plan into its General Plan document.

In conclusion, the city of Goodyear and Estrella Mountain Ranch Developers, LLC have made significant investments in our community's future by planning for development around a future Interstate Highway/State Route freeway corridor. The four existing and proposed economic activity and employment centers within the Estrella master planned community would be strongly supported and enhanced by the access and substantial mobility capacity provided by a future SR 303L South extension/I-11 trade corridor as identified herein without bifurcation of the Estrella community. The appropriate placement of these freeway corridors are the backbone of regional economic development envisioned within Estrella and city of Goodyear.

Please feel free to contact me at (602) 468-0800 if you have any questions or concerns regarding Newland Real Estate Group, LLC and Estrella Mountain Ranch Developers, LLCs position on this very important project.

Thank you.

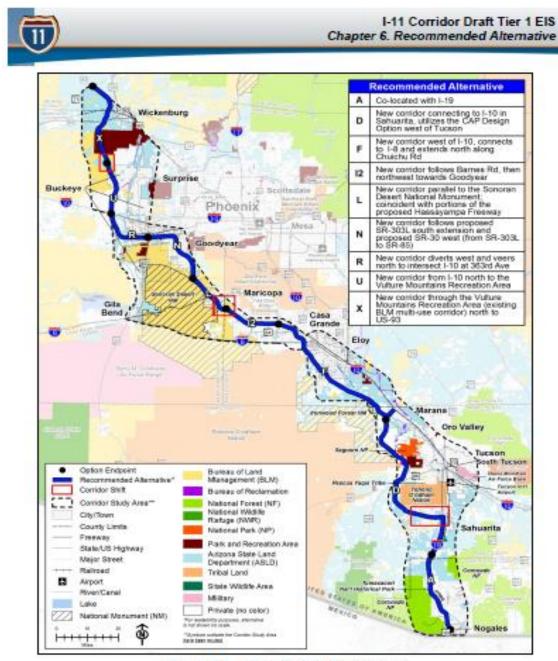
Bill

William Olson Senior Vice President

- Olson, W Estrella Mountain Ranch Developers, LLC (Estrella) - Comments on I-11 Draft Tier^{B-20} 1 Environmental Impact Statement and Preliminary Section 4 (f) Evaluation (Draft Tier 1 EIS) Nogales to Wickenburg dated March 2019
- cc: Interstate 11 Tier I EIS Study Team c/o ADOT Communications 1655 W. Jackson St., Mail drop 126F Phoenix, AZ 85007

Julie Arendall City Manager City of Goodyear 190 North Litchfield Road Goodyear, AZ 85338

Rebecca Zook City Engineer City of Goodyear 190 North Litchfield Road Goodyear, AZ 85338



Appendix A: Figure 6-4 Recommended Alternative [ADOT]

Figure 6-4 Recommended Alternative

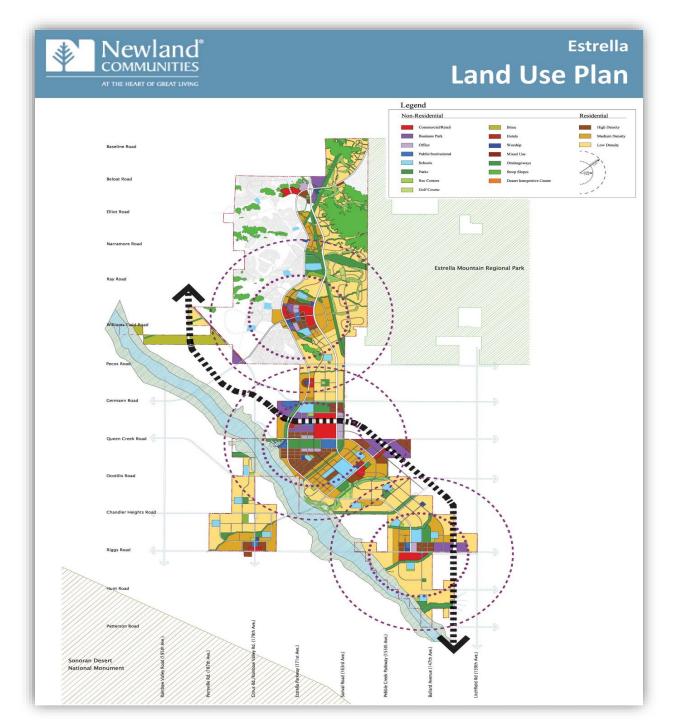
Project No. M5150 01P / Federal Ald No. 990-M(161)S

March 2019 Page 6-19

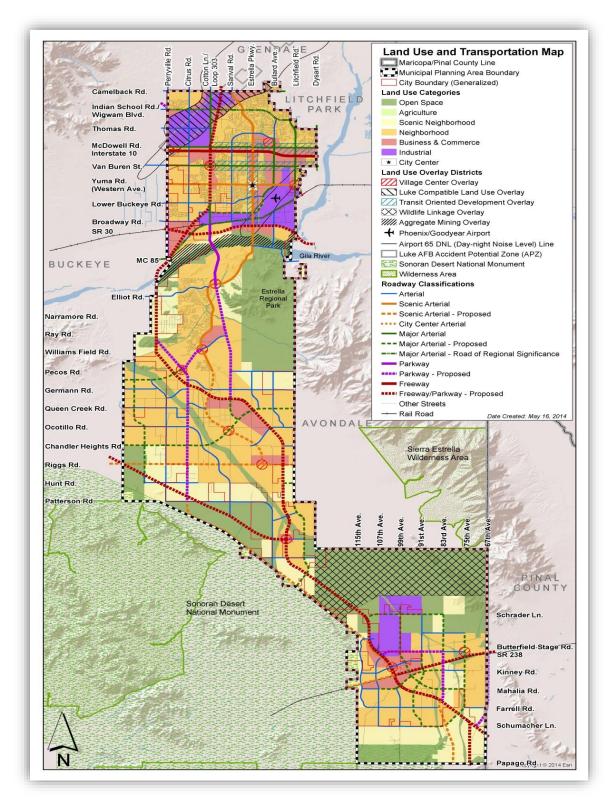
Appendix A2: Figure 6-4 Recommended Alternative [ADOT] – location at westernmost 400' of the 2000 foot corridor (represented by the left hand smooth gray radius arc depicted below)



Appendix B: Estrella Land Use Plan



Appendix C: City of Goodyear 2025 General Plan - Land Use and Transportation Plan



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Estrella Mountain Ranch Developers, LLC ("EMRD") 5090 N. 40th Street, Suite 210 Phoenix, Arizona 85018

July 11, 2019

Via U.S. Mail and Hand Delivery

Mr. Jay Van Echo Project Manager Interstate 11 Alternatives Analysis / Tier I EIS Arizona Department of Transportation ("ADOT") 1655 W Jackson St., Mail Drop 126F Phoenix, AZ 85007

Re: Newland Real Estate Group, LLC ("Newland") and EMRD Clarifications to Comments on the Interstate 11 Recommended Alignment in the Draft Environmental Impact Statement (DEIS)

Dear Mr. Van Echo,

Thank you for the opportunity presented to the stakeholders and community members to provide input on ADOT's Recommended Alternative for the future Interstate 11 corridor through Central Arizona, as well as the Draft Environmental Impact Statement (DEIS). The recent Public Meetings were very helpful in expanding the understanding of the direction that this project has taken, and I would like to complement you on their success.

For the purpose of continuity, please refer to my letter to you from June 2nd, 2017 (Appendix F) on behalf of Estrella Mountain Ranch Developers, LLC (EMRD) regarding its 22,000-acre Estrella master planned community putting on record our strong preference for the I-11 alignment alternatives 'M' and 'N' as shown on the Central Section Maps during the early 2017 Agency Coordination and Public Information Meetings.

We have now reviewed the DEIS in great detail and looked at the location of the 2000' corridor alignment through the Estrella Master Planned Community, as illustrated in the Recommended Alternative, and compared it to the future Loop 303 corridor alignment in the City of Goodyear 2025 General Plan: Land Use and Transportation Plan. Appendix A illustrates the I-11 Recommended Alternative in relation to the City of Goodyear Transportation Plan.

It is understood that at the Tier 1 Environmental Impact Statement (EIS) level, the focus is on identifying a broad 2000' wide general corridor alignment where the future I-11 facility could be built, and therefore the exact location of the facility within the 2000' corridor has not been determined at this time. However, in this specific case of Estrella Master Planned Community, more specific location of the I-11 corridor is needed due to the existing planning in place (Estrella Master Plan and City of Goodyear Transportation Plan), and ongoing platting and subdivision construction.

Mr. Jay Van Echo July 11, 2019

Re: Newland and EMRD (Estrella) Clarifications Comments on the Interstate 11 Recommended Alignment in the Draft Environmental Impact Statement (DEIS)

As illustrated in Appendix A, the I-11 Recommended Alignment in many places does not coincide with the SR 303L South alignment, as adopted in the City of Goodyear 2025 General Plan. Between Ray Road and Germann Road, the recommended alignment is only less than a half-mile to the east of the SR 303L alignment, but goes up to half-mile west between Germann Road and the future Hassayampa Freeway. This change in locally adopted alignment of the freeway would significantly impact the planned activity centers and residential neighborhoods, some of which already exist.

The master plan for Estrella was developed in the early 2,000s with the assumption that the future SR 303L South would traverse through the Estrella community. The key theme of the strategic development plan for the community identified four activity centers within the community, with the future freeway corridor providing access to these centers of business and commerce. The freeway corridor would provide opportunities for local and regional economic development. The Estrella Strategic Development Plan is attached to this letter (Appendix B) for your reference. The master plan for Estrella was developed in coordination with the City of Goodyear, and the City bought into the concept of connected activity centers when it adopted the Estrella master plan into its General Plan document.

The City of Goodyear 2025 General Plan, in its future Land Use and Transportation Plan, identified the SR 303L/I-11 corridor as a major transportation artery through the city, and through the Estrella Mountain Ranch Development. The Land Use and Transportation Plan (see attached Appendix C) identified a generally north-south freeway alignment and a generally east-west freeway alignment for the SR 303L corridor. The City of Goodyear envisions the Estrella master planned community playing a critical role in the growth of the City by providing a compatible mix of land uses that foster a quality community; providing an integrated lifestyle with residential neighborhoods, commercial activity centers, and a variety of trails, open space, and recreational activities; and ensuring that a good mix of land uses and zoning will ensure a stable revenue stream in the future.

The I-8/I-10 Hidden Valley Transportation Framework Study conducted by the Maricopa Association of Governments (MAG) also identified the future SR 303L South freeway corridor as part of the Recommended Framework (Appendix D). In addition, the Interstate 10/Hassayampa Valley Transportation Framework Study also called for the SR 303L South Extension (Appendix E).

As mentioned in our earlier letters to ADOT, the City of Goodyear and EMRD and Newland have made significant investments in our community's future by planning for development around a future interstate highway/freeway corridor. As mentioned before, the four existing and proposed economic activity centers within the Estrella master planned community would be strongly supported and enhanced by the access and substantial mobility capacity provided by a future SR 303L South extension/I-11 trade corridor. These freeway corridors are the backbone of regional economic development envisioned within Estrella and city of Goodyear.

Mr. Jay Van Echo
July 11, 2019
Re: Newland and EMRD (Estrella) Clarifications Comments on the Interstate 11 Recommended Alignment in the Draft Environmental Impact Statement (DEIS)

With this letter, Estrella Mountain Ranch Developers, LLC (EMRD) and Newland would like to reiterate our commitment to the future I-11 corridor and record our strong request to ADOT to refine the I-11 Recommended Alignment to follow the centerline of the SR 303L alignment through Estrella, as shown in the City of Goodyear Transportation Plan.

Please feel free to contact me if you have any questions or concerns regarding Newland Communities' position on this very important project.

Thank you.

William Olson Vice President of Newland Real Estate Group, LLC Development Manager

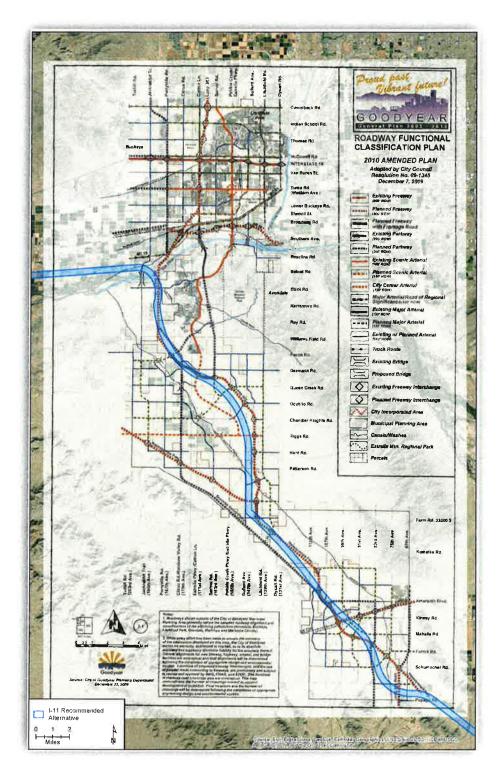
CC: Via Electronic Mail

Julie Arendall City Manager City of Goodyear 190 North Litchfield Road Goodyear, AZ 85338

Rebecca Zook City Engineer City of Goodyear 190 North Litchfield Road Goodyear, AZ 85338 Mr. Jay Van Echo July 11, 2019

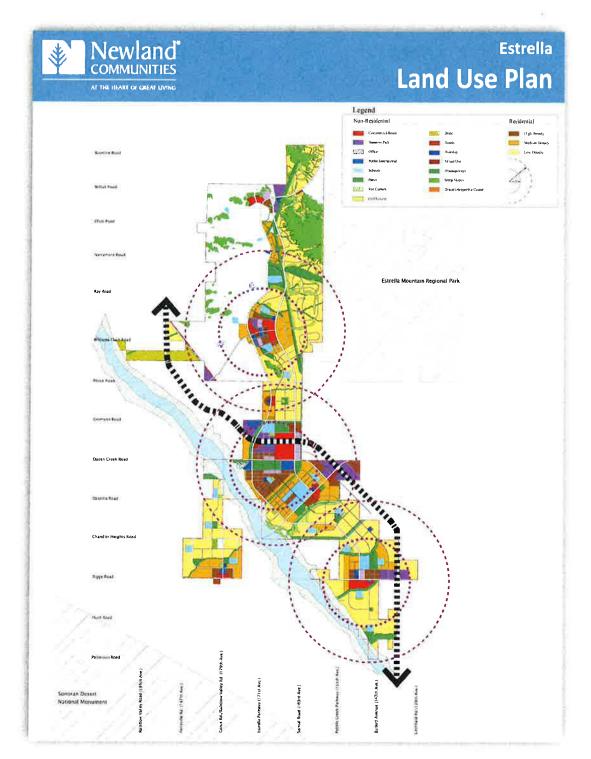
Re: Newland and EMRD (Estrella) Clarifications Comments on the Interstate 11 Recommended Alignment in the Draft Environmental Impact Statement (DEIS)





Mr. Jay Van Echo July 11, 2019

Re: Newland and EMRD (Estrella) Clarifications Comments on the Interstate 11 Recommended Alignment in the Draft Environmental Impact Statement (DEIS)

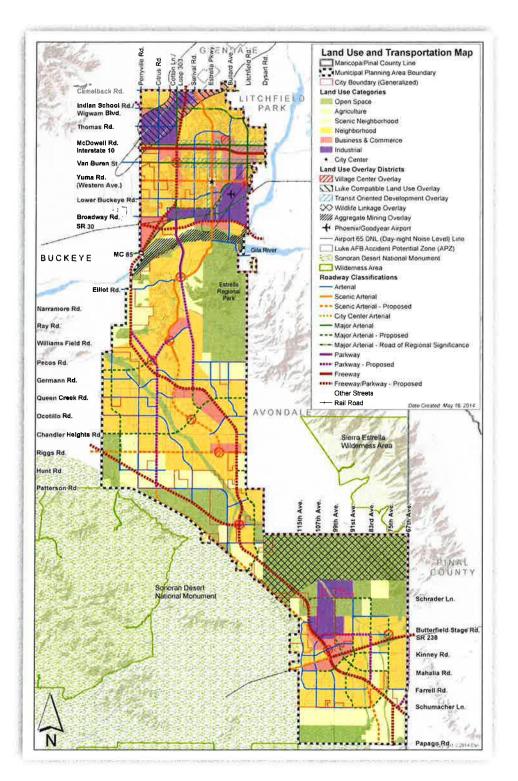


Appendix B: Estrella Land Use Plan

Mr. Jay Van Echo

July 11, 2019

Re: Newland and EMRD (Estrella) Clarifications Comments on the Interstate 11 Recommended Alignment in the Draft Environmental Impact Statement (DEIS)



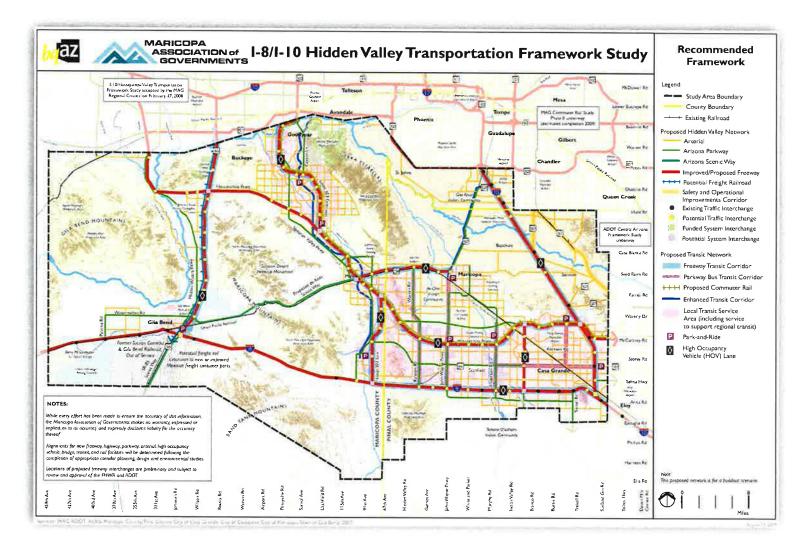
Appendix C: City of Goodyear 2025 General Plan - Land Use and Transportation Plan

Mr. Jay Van Echo

July 11, 2019

Re: Newland and EMRD (Estrella) Clarifications Comments on the Interstate 11 Recommended Alignment in the Draft Environmental Impact Statement (DEIS)

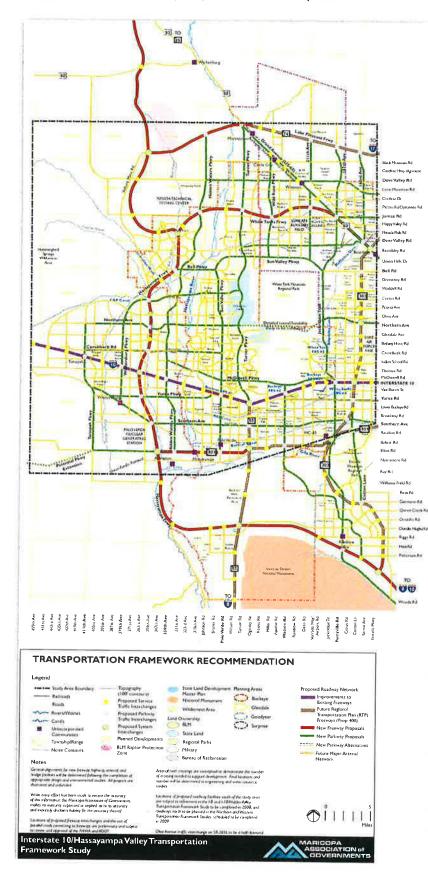
Appendix D: MAG I-8/I-10 Hidden Valley Transportation Framework Study - 2009



Page 7

Mr. Jay Van Echo July 11, 2019 Re: Newland and EMRD (Estrella) Clarifications Comments on the Interstate 11 Recommended Alignment in the Draft Environmental Impact Statement (DEIS)

Appendix E: MAG I-10/Hassayampa Valley Transportation Framework Study - 2008



Mr, Jay Van Echo July 11, 2019 Re: Newland and EMRD (Estrella) Clarifications Comments on the Interstate 11 Recommended Alignment in the Draft Environmental Impact Statement (DEIS)

Appendix F: Newland Letter to Jay Van Echo/ADOT dated June 2nd, 2017

ATTACHED TO THIS PAGE

Estrella Mountain Ranch Developers, LLC 5090 N. 40th Street, Suite 210 Phoenix, Arizona 85018

June 2, 2017

Sent Via: U.S. Mail and Electronic Mail I-11ADOTStudy@hdrinc.com JVanecho@azdot.com

Mr. Jay Van Echo Project Manager Interstate 11 Tier I EIS Study Team Arizona Department of Transportation Communications Phoenix, AZ 85007

Re: Estrella Mountain Ranch Developers, LLC (Estrella) - Comments on the Alternative Routes Being Considered for Interstate 11

Dear Mr. Van Echo,

Thank you for the opportunity presented to the stakeholders and community members to provide input on the various corridor route alternatives being considered by ADOT for the future Interstate 11 corridor through Central Arizona. I had the pleasure of attending the Agency Coordination Meeting in Avondale on Tuesday, May 16, 2017 where I was able to look at the various project graphics. Please accept my complements on the excellent and informative Agency Coordination Meeting, your slide presentation, and the very informative and user-friendly display graphics.

Through this letter, on behalf of Newland Real Estate Group, LLC, as Development Manager for Estrella Mountain Ranch Developers, LLC, I would like to put on record our strong preference for the I-11 alignment alternatives 'M' and 'N' as shown on the Central Section Maps during the recent Agency Coordination and Public Information Meetings.

As you know, Estrella Mountain Ranch Developers, LLC (through its subsidiaries) owns approximately 20,000 acres of combined land (called "Estrella") just west of the Estrella Mountains in the west valley of the Phoenix Metropolitan Area. Estrella was originally named Estrella Mountain Ranch when it was initially planned and development was initiated in 1985, but the name has subsequently been shortened to Estrella for ease in marketing purposes. Estrella is a master planned community located within City of Goodyear, AZ and is uniquely situated in a broad valley between several prominent natural features, including the Gila River, the Sierra Estrella Mountains, and the Sonoran Desert National Monument.

Estrella accounts for roughly 32 square miles of the City of Goodyear (roughly 20% of land area within the City of Goodyear), and is located just south of I-10, and in close proximity to the I-10/SR 303L Systems Interchange. At build-out, Estrella is expected to provide a total of approximately 51,000 residential units (approximately 144,000 residents [using an average household size of 2.82; Source: Estrella Strategic Plan – December 31, 2006]) and is anticipated to create 51,644 jobs. At present, Estrella is home to approximately 14,000 residents. Estrella is anticipated to help in realizing the City's vision for a resilient and diversified economy by providing an opportunity for

locally based employment and economic opportunity, and serve as a home to an educated and healthy workforce. Estrella master planned community provides a well-connected roadway network, and aims to provide an efficient multimodal transit system and options for other modes of travel. As you can imagine, the development potential of the Estrella community is directly linked to the future SR 303L South Extension and Interstate 11 Trade Corridor going through this area.

The master plan for Estrella was developed in the early 2,000's with the assumption that the future SR 303L South would cross the Gila River and remain west of the Estrella community and then traverse to the east through Estrella between the Germann Road and Queen Creek Road alignments. The key theme of the strategic development plan for the community identified four activity centers within the community, with the future freeway corridor providing access to these centers of business and commerce. The freeway corridor would provide opportunities for local and regional economic development. The Estrella Strategic Development Plan is attached to this letter (Appendix A) for your reference. The master plan for Estrella was developed in coordination with the City of Goodyear, and the City bought into the concept of connected activity centers when it adopted the Estrella master plan into its General Plan document.

The City of Goodyear 2025 General Plan, in its future Land Use and Transportation Plan, identified the SR 303L/I-11 corridor as a major transportation artery through the city, and through the Estrella Mountain Ranch Development. The Land Use and Transportation Plan (see attached Appendix B) identified a generally north-south freeway alignment, which corresponds with the I-11 alternative alignment "N". Additionally, a generally east-west freeway alignment is also shown in the General Plan that corresponds to the I-11 alternative alignment "M". The City of Goodyear envisions the Estrella master planned community playing a critical role in the growth of the City by providing a compatible mix of land uses that foster a quality community; providing an integrated lifestyle with residential neighborhoods, commercial activity centers, and a variety of trails, open space, and recreational activities; and ensuring that a good mix of land uses and zoning will ensure a stable revenue stream in the future.

The I-8/I-10 Hidden Valley Transportation Framework Study conducted by the Maricopa Association of Governments (MAG) also identified the future SR 303L South freeway corridor (alignment "N") and the future Hassayampa Freeway (alignment "M") as part of the Recommended Framework (Appendix C). In addition, the Interstate 10/Hassayampa Valley Transportation Framework Study also called for the SR 303L South Extension (Appendix D).

The City of Goodyear and Estrella Mountain Ranch Developers, LLC have made significant investments in our community's future by planning for development around a future interstate highway/freeway corridor. As mentioned before, the four existing and proposed economic activity centers within the Estrella master planned community would be strongly supported and enhanced by the access and substantial mobility capacity provided by a future SR 303L South extension/I-11 trade corridor. These freeway

corridors are the backbone of regional economic development envisioned within Estrella and city of Goodyear.

Should ADOT's Alternative Selection Report process for the I-11 Corridor result in the selection of alignments "M" and/or "N" as a result of technical analysis and public input, Newland Communities would be willing to discuss opportunities for dedication of right-of-way for the corridor where it crosses the Estrella master planned community.

Please feel free to contact me at (602) 468-0800 if you have any questions or concerns regarding Newland Real Estate Group, LLC and Estrella Mountain Ranch Developers, LLCs position on this very important project.

Thank you.

Bill

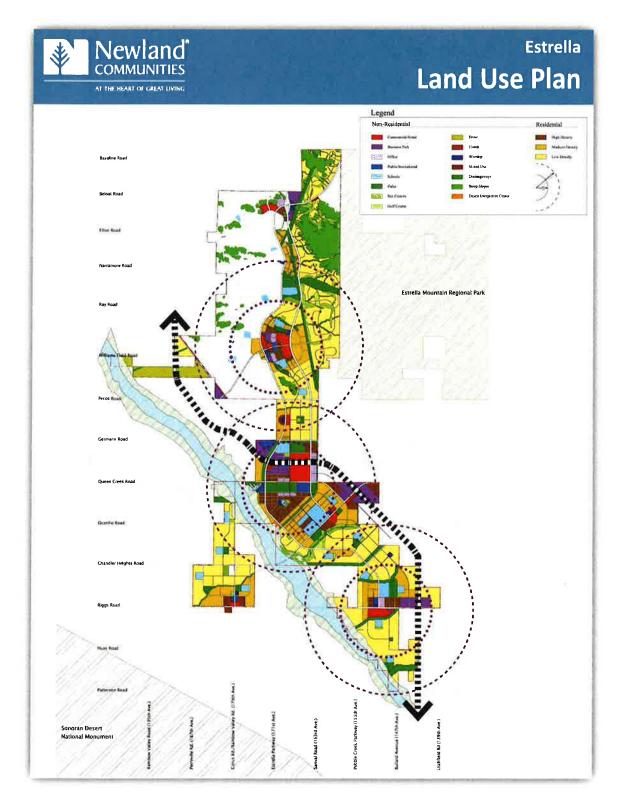
William Olson Vice President of Newland Real Estate Group, LLC Development Manager

cc: Interstate 11 Tier I EIS Study Team c/o ADOT Communications 1655 W. Jackson St., Mail drop 126F Phoenix, AZ 85007

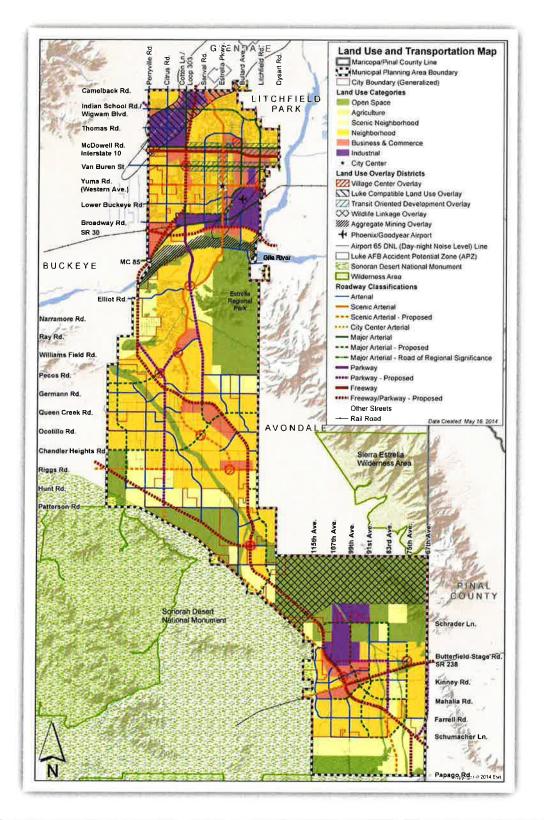
> Mr. Brain Dalke, CEcD City Manager City of Goodyear 190 North Litchfield Road Goodyear, AZ 85338

Mr. Christopher Baker, AICP, MBA Development Services Director Development Services Department City of Goodyear, Arizona 14455 W. Van Buren Street Suite D101 Goodyear, Arizona 85338

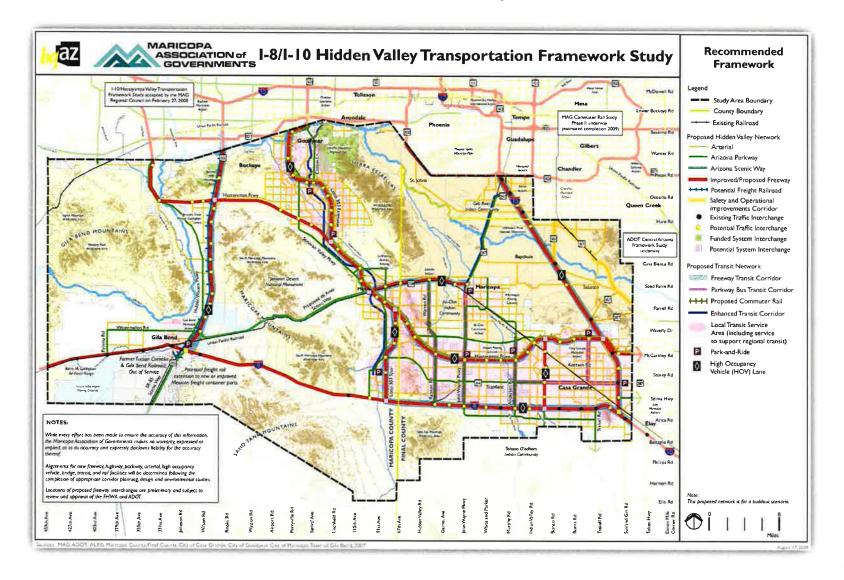
Appendix A: Estrella Land Use Plan



Appendix B: City of Goodyear 2025 General Plan - Land Use and Transportation Plan

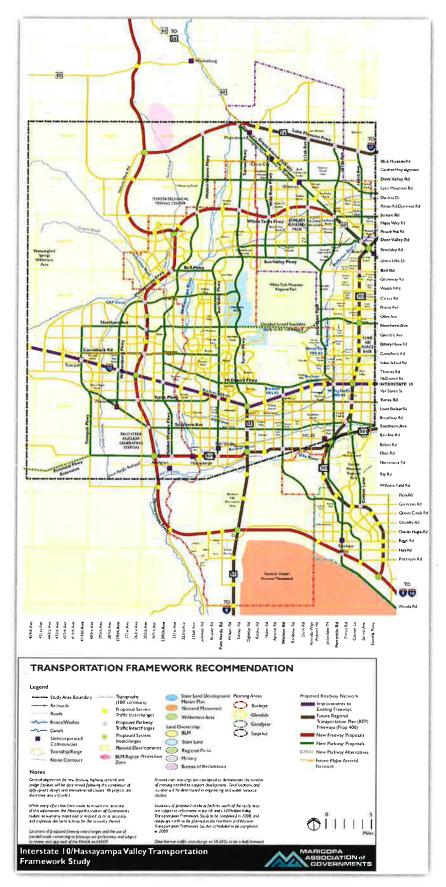


Appendix C: MAG I-8/I-10 Hidden Valley Transportation Framework Study - 2009



Page 6

Appendix D: MAG I-10/Hassayampa Valley Transportation Framework Study - 2008



The I-11 has been planned for many years. This plan would relieve I-10 of the truck traffic as planned. The short sighted vision, inability to see the safety benefits only reenforces the incompetence of the Tucson City Counsel. The few that would be afected should not out weigh the needs of the many. The environmental is minimal for the size of this project. Build I-11!

Richard Ortiz

Last modified: 10:26 PM

The proposed I-11 will affect Tucson, Arizona Sonora Desert Museum, Saguaro National Park and Ironwood forest National Monument.

Tucson has visitor coming up from Mexico and down from Canada, without tourism, the town will be

affected. Tourism comes from around the world including China. In 2016, tourist spent 21.1

billion dollars in Arizona (Fisher). In 2016, Pima county provide 82.8 million dollars in local taxes,

compared to Maricopa 590.3 million.

Social media create publicity for AZ and its natural wonders, which causes interest from other

countries and come to AZ to see for themselves the natural wonders (Fisher).

State parks received 2.78 million visitors in 2017 and generated 17.9 million dollars (Harris).

The Arizona Sonora Desert museum would be impacted, which is a place where schools take children to

teach them about the environment that we live on, about 35,000 school children annually

(Desert Museum).

Facts about AZ Sonora Desert Museum:

- The Museum was founded in 1952 and is dedicated to the interpretation of the bi-national Sonoran Desert region.
- 85% of what you will experience is outdoors.

there are two miles of walking paths, 16 individual gardens, 1,200 native plant species and 56,000 individual plants.

- The animal collection currently includes 230 native mammals, reptiles, amphibians, insects, and birds including a multi-species hummingbird aviary.
- The Museum was named the #9 Museum in the U.S. by TripAdvisor in 2014. The Museum was also named the #5 Public Garden in the U.S. by TripAdvisor in 2013. And the Desert Loop Trail was included in USA Today's 10Best Zoo exhibits in the U.S. in 2015.
- The Museum hosts about 400,000 visitors annually and reaches approximately 35,000 school children each year though field trips and outreach programs.

the region's rivers, native fish and conservation efforts while the salt-water gallery showcases marine life from the Gulf of California. A hands-on tide pool encounter offers twice-daily interpretations for visitors.

• The Museum includes an Earth Sciences Center which recreates an underground cave, complete with stalactites and stalagmites, and houses one of the world's most comprehensive regional mineral collections in the world.

showcasing often-misunderstood venomous reptiles, Fur Feathers & Fangs,

where visitors watch from the flight path as native birds of prey whiz by so close visitors can feel the brush of feathers. There are two presentations daily and each demonstrates different birds. One program showcases Harris' Hawks, the only raptors in the world that hunt as a family group using strategy, like wolves.

animal keeper interactions where visitors can watch feedings, enrichment activities or animal training sessions for veterinary care procedures, and docent engagement stations.

through art education. The Art Institute has a permanent traveling collection and offers a variety of visual art classes throughout the year.

children's, and guide books featuring the Sonoran Desert Region.

jewelry, pottery, gift items, books, and gardening items.

Ironwood Terraces with a casual, food-court setting. There are two additional snack shops on the grounds.

• The Museum has discontinued the sale of water in plastic bottles. However, refillable water bottle stations and fountains are located throughout the grounds.

Saturday evenings the Museum is open until 10:00 p.m. with themed programs especially for families after 6 p.m.

• The Museum is located 14 miles west of Tucson in Tucson Mountain Park. just 2 miles from Saguaro National Park (West) Visitors Center.

The Saguaro National Park in 2014 received about 673 thousand visitors, which help support 610 jobs

and the local economy receive 58 million dollars (NPS1). In 2017, the park had about 976

thousand visitors and supports 866 jobs and benefit local economy of 88,682,500 dollars (NPS2).

That equals returning 10 dollars for every 1 dollar invested. Visitors come from around the

country and the world. The National Park Service (NPS) say that "Visitors can experience

Ortiz, S I-1606

exceptional wilderness, scenic views and a richly diverse ecosystem, all in close proximity to a large urban community."

Facts about the Saguaro National Park: "The report shows \$18.2 billion of direct spending by more than 330 million park visitors in communities within 60 miles of a national park. This spending supported 306,000 jobs nationally; 255,900 of those jobs are found in these gateway communities. The cumulative benefit to the U.S. economy was \$35.8 billion. The lodging sector received the highest direct contributions with \$5.5 billion in economic output to local gateway economies and 49,000 jobs. The restaurants sector received the next greatest direct contributions with \$3.7 billion in economic output to local gateway economies to the 2017 report, most park visitor spending was for lodging/camping (32.9 percent) followed by food and beverages (27.5 percent), fuel (12.1 percent), souvenirs and other expenses (10.1 percent), admissions and fees (10.0 percent), and local transportation (7.5 percent)" (NPS2).

Per the Bureau of Land Management (BLM) "This Ironwood Forest National Monument is made up of 129,000-acres and contains a significant system of cultural and historical sites covering a 5,000 year period. Possessing one of the richest stands of ironwood in the Sonoran Desert, the monument also encompasses several desert mountain ranges including the Silver Bell, Waterman, and Sawtooth, with desert valleys in between. Elevation ranges from 1,800 to 4,261 feet. Three areas within the monument, the Los Robles Archeological District, the Mission of Santa Ana del Chiquiburitac and the Cocoraque Butte Archeological District are listed on the National Register of Historic Places" (BLM).

It is better to build on top of the existing I-10 route.

Fisher, Howard; <u>https://tucson.com/business/tourists-visiting-arizona-spent-a-record-billion-last-year/article_8b649c3c-a553-505d-b2db-75e26bb71b73.html</u>

Harris, Craig; <u>https://www.azcentral.com/story/news/local/arizona-investigations/2017/08/18/arizona-state-parks-revenue-visitation-and-some-staff-pay-rise-under-director-sue-black/574797001/</u>

Desert Museum; <u>https://www.desertmuseum.org/about/fastfacts.php</u>

NPS1; https://www.nps.gov/resources/2016.htm?id=52736661-1DD8-B71B-0B83FE3916484289

NPS2; <u>https://www.nps.gov/sagu/learn/news/tourism-to-saguaro-national-park-creates-88-682-500-in-economic-benefits-in-2017.htm</u>

BLM; https://www.blm.gov/visit/ironwood

To whom it may concern, I am a 3ª generation Tursman. I have seen This 'old public' grav noto a beautiful City. Place concern the impact 1-11 would have on all Wing life have! I believe this would be very damaging both natural reservers and legrade the lister experience. Please Stop! Thank gw-Mag M. Pepp 520-909-5390 blessingsonger legimailcom P.O. Bap 5260 TUISM AR 85703

Dear ADOT,

I am a resident of Tucson and opposed to the proposed I-ll project. The project would negatively impact the diverse uildeife which fuctionants strive to protect. A large draw of tucson, and the ability for it to economically expand, is due to the beautiful and rare mildlife. Destroying this wildlife would remare the heart of our city and detract from the economic boosts we recieve from our purists. Along with the conomic pitfalls, the I-17 project is morally wrong and short-sighted to the future generations of our city. This project would set a precedent to degrade other protected areas around tucson, leading to possible distinction of our wildlife and plants. Please reconsider supporting this project. Sincerly, 3324 & and st. Tess Perdue Tucson, AZ SSTIL TESS Perdue



Nogales to Wickenburg

COMMENT FORM

Thank you for participating in the I-11 Draft Tier 1 **Environmental Impact Statement public comment process.**

The Arizona Department of Transportation (ADOT) and the Federal Highway Administration (FHWA) encourage all interested parties to submit comments on any aspect of the Draft Tier 1 EIS. ADOT and FHWA will consider all comments in preparing the Final Tier 1 EIS, which will include responses to all comments received during the Draft Tier 1 EIS comment period, and will identify a Preferred Alternative (either a Build Alternative or the No Build Alternative).

When submitting comments, please be as specific as possible and provide details on your concerns and recommendations.

It is helpful to ADOT and FHWA to receive comments on:

- Any alternative or mitigation measure you support or oppose and why
- The analysis of environmental impacts and performance of alternatives
- Information you believe is incomplete or incorrect

Please print your comments below. Comments must be received or postmarked by July 8, 2019. e hes 0 DUN chinck DA G OUN NITH 0 sant on Ser vat Inc Ine re OW WIL golet Sky our animals le ease CONSIDO PXI USING mm 5 not n 100 an 20 ES NDT An **Contact Information (optional)** SKIpperbarb36@ hotmail.com Perlmutter Rab Email Name PAle Mar

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Pursuant to Title VI of the Civil Rights Act of 1964, the Americans with Disabilities Act (ADA) and other nondiscrimination laws and authorities, ADOT does not discriminate on the basis of race, color, national origin, sex, age, or disability. Persons who require a reasonable accommodation based on language or disability should contact Laura Douglas, ADOT Community Relations Project Manager, at 602.712.7683 or Idouglas@azdot.gov. Requests should be made as early as possible to ensure the State has an opportunity to address the accommodation.

State A 2

有关中文信息,请致电 1-844-544-8049.

CONTACT

MAIL: I-11 Tier 1 EIS Study Team • c/o ADOT Communications • 1655 W. Jackson Street, Mail Drop 126F • Phoenix, AZ 85007 EMAIL: i-11ADOTStudy@hdrinc.com | PHONE: 1-844-544-8049 (Toll-free/bilingüe) | WEBSITE: i11study.com/Arizona



ADOT Project No. 999 SW 0M5180 01P | Federal Aid No. 999-M(161)S i11study.com/Arizona May 14, 2019

West Valley Community Members

The Honorable Doug Ducey Governor of Arizona 1700 W. Washington Phoenix, AZ. 85007

Dear Governor Ducey,

We, the business owners, land owners, home owners, and community members who will be directly affected by the Interstate 11 are voicing our strong objections to the Arizona Department of Transportation and the Federal Highway Administration's "preferred" Blue corridor. Our concerns consist of the negative consequences our West Valley will sustain if this route is designated. This proposed corridor will reek havoc on the agricultural land, businesses, schools, churches, and individual residents in our communities.

Thousands of acres of prime farm ground could be deemed useless, affecting our state's contribution in feeding and clothing the people of our nation. It is vital that our country consider the national security risks that come into play if agriculture continues to be devalued across our United States. Arizona has always considered agriculture of high importance to our economy; as evidenced by our 5 C's taught in schools and the field crops represented in our State capitol's mosaic seal.

The Blue corridor completely alters the Buckeye Conservation and Drainage District's water delivery system. In short, this is the irrigation system for 17,000 acres of land. The canal itself, the laterals, the head gates, as well as irrigation wells would be displaced. This disruption of water delivery at any time would be devastating to not only farmland in the area near the route; but also thousands of acres that are watered by the BWCDD. The impact of this possible disruption would amount to millions of dollars of losses in crop production, as well as jobs lost in the agriculture sector. The economic burden would be felt across our state.

Hundreds of homes, from small homes to custom homes, stand in the path of this route. Many of these families are descendants of the first homesteaders on this land. There is no way to define the value of this heritage. Regardless of time lived in this area, the value of our property set by the state as they condemn it, will not begin to adequately compensate for our homes and our rural lifestyle.

We heard during the April 29th public meeting in Buckeye that even if ADOT and the FHWA do proceed with the Blue corridor designation it may not come to fruition for 20 to 30 years. However, if this corridor is designated our property values drop immediately because of the unknown factors this corridor presents for the future.

The impact to our communities, specifically our businesses, schools, and churches would drastically change the face of our West Valley. A great many businesses of various types in the direct path of this route could ultimately be lost. Those lying in close proximity of the route would have either altered access or be denied access completely. Jobs and employment would effectively be lost.

Our schools, our children's education, would be threatened. Most of the communities affected are rural districts, thus encompassing many miles serviced by our schools. Transportation would be difficult and costly for families, as well as school districts, and ultimately the state. This route causes, at the least, changes in bus runs and family schedules; and at the worst the real possibility of the closing of schools. Travel time to and from schools would be increased, encroaching on the school day. We could see a similar effect on our church and community groups. This route carves through the heart of many small towns and communities. We join together for community wide functions and activities to support families and individuals alike. This would threaten the well being of our West Valley life.

In summary, we strongly object to the state of Arizona moving forward with the Blue corridor. The divisive nature and the impending destruction to our communities is far too great. However, the proposed Orange corridor, which uses existing roadways appears more conducive to the I-11 goals and with far fewer negative effects to West Valley communities.

Respectfully,

West Valley Community Members

CC ADOT Director John S. Halikowski

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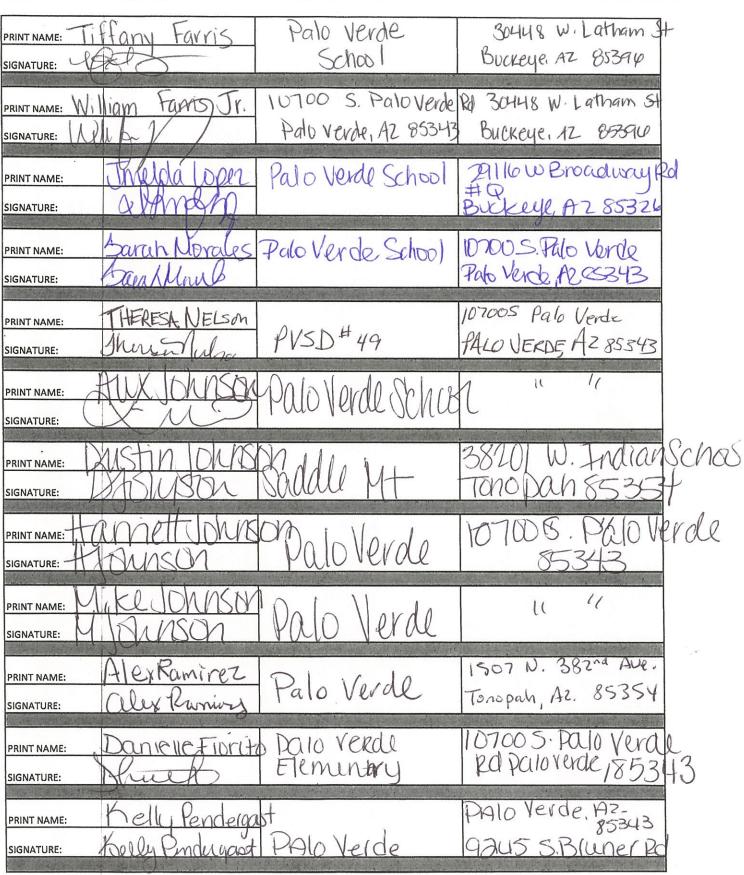
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PRINT NAME: SIGNATURE:	Sandra Wilson and Wilson	Palo Verde School	10700 S. Palo Verde Rd Palo Verde Az 85343
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PRINT NAME:	Jody Stanberry Jody Stanberry		10700 S Paloverde Rd Palo Verde, AZ 85343
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PRINT NAME: JESSICG Underhart SIGNATURE: JESSEC Janduh		29803 W Carver Ed. Pajo Vende, A2 85343
PRINT NAME: Michael Hardin SIGNATURE: Mbul Handhi	Mike Hardin Farms	30201 W. Narramore Rd Palo Verde Az 85343
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PRINT NAME: BAYD OV C. Schrader SIGNATURE: BOLD	Lover River Ranch	36251 W. Lower RUC Buckeye, AZ- 85326
PRINT NAME: Scott Schooler SIGNATURE: Scott School	Lower River Ranch	30251 W. Lower River RD. Bacticy 12. 85326
PRINT NAME: Chad Turner	Arlington School District	9132 S Johnson Rd Buchege 4285326
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PRINT NAME: RYOHARD HODKINS	105 233 Buckey Az 85326
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	NAME/ SIGNATURE	BUSINESS	ADDRESS
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-	PRINT NAME: MONG UHR ILC SIGNATURE: MONG UHR ILC		266027 2. HAZENED
	PRINT NAME MAR GARET WELCH SIGNATURE: THAT MALOT WOLCH		POBox 188 Buckeye, A28532
	PRINT NAME: DAN WELCH SIGNATURE: Day (Ilulah)		PO Box 188 Buckeye, A285326
	PRINT NAME: ROBERT WELCH	Welch Premp Co.	Hoodyean AZ 85 10515 5. 29th AVE
	PRINT NAME: KONOVO HOLL SIGNATURE: ROMANA PRINT NAME CON HOL		10515 5.269 MAR
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	PRINT NAME: JANIESUNC		PALO VERDE, AZ ZZQUS CU DURMOST
	PRINT NAME: Billie Helmeci		30431 WPsrtland St Buckleye Ac 85396
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PRINT NAME:	Brian Pendergas		9245 S. Bruner Rd
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PRINT NAME:	Dowe Turner	Discibled	34242 W. Wayland PR.
SIGNATURE:	Dairelin		TOMOPAL, AZ 85354
PRINT NAME:	Lisa McDonald	Palo Verde	3681 Nº 3041 Ave.
SIGNATURE:	Xisa Mc Omald	Elementary School	BUCKEVE, AZ 85396
PRINT NAME:	Felicia Herriage	Palo Verde Elementary School	29210 W. Van Burenst, Buckeye, Az. 85396
SIGNATURE:	Felicia Herriage		
PRINT NAME:	Susan Wermager-Hurri		307E Baseline Rd
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Phillips, L I-1626

Monday, June 17, 2019

664 S Main Ave Tucson, Arizona

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

To Whom It May Concern:

I am writing to express my absolute opposition to all route alternatives other than the no build option.

Every route except the no build option would open up ecologically important desert spaces to new commercial and residential development, a factor that is overlooked in this environmental impact statement. The presence of a new freeway corridor would fragment important habitat and inevitably lead to more environmental destruction.

The impacts to Saguaro National Park West are not fully appreciated in this study. The adverse impact on views and the enjoyment of the National Park would be impossible to mitigate.

This EIS does not adequately take into account the reality of climate crises and the increase in carbon emissions facilitated by this project. It is urgent that the Arizona Department of Transportation chose the no build option on this project and instead re-focus on supporting both freight and passenger rail.

Furthermore, this project is absolutely not worth the pricetag nor the environmental impacts, which are in fact impossible to mitigate fully. The stated motivation of saving "an hour of driving time between Nogales and Wickenburg by 2040" is ridicules on on its face, all the more so when considering that all proposed routes closely parallel I-10 which in 2019 is *still* only four lanes wide in some sections.

For all these reasons and many more, this statement is deeply flawed in its willful ignorance of the chain reaction of environmental impacts sparked by the misguided I-11 project. This is a freeway that would be built for the sake of building a freeway, and it has no meaningful public support. As an Arizonan who funds ADOT through my taxes, I demand that this project be abandoned before it becomes any more wasteful than it already is.

Sincerely,

Jogan Phi

Logan Phillips

May 25, 2019

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

Pierpoint Farms, Inc. Roy & Ella Pierpoint 30125 W. Pierpoint Rd. Arlington, AZ 85322



Pierpoint Farms, Inc.

Re: Interstate 11 Recommended Corridor Alternative

To whom it may concern:

Destruction of Farmland:

We wish to comment on the Recommended Corridor Alternative designated by the blue on ADOT maps, more particularly the area where the recommended corridor crosses the Gila River in Rainbow Valley where it straddles S. Tuthill and Jackrabbit Trail, and proceeds west through farmland to straddle Beloat Road and eventually intersects Hazen road in south Buckeye and Palo Verde before turning north again near 341st Avenue.

Statistics sited in farm reports say that 1.5 million acres of farmland are destroyed every year in the U.S. Recently I visited with some of the farmers who are located within the recommended blue corridor and they said their farmland would be divided in such away as to have farm fields on both sides of the freeway. Farmers and their equipment would have a difficult time accessing fields on both sides of the freeway.

This impacts approximately 500 acres of choice farmland along a 14-mile strip in Buckeye north of the Gila River. Once the I-11 corridor was built development would take out more farmland on each side on the I-11 much like what has occurred along other freeways.

Division of Neighborhoods:

This route would divide neighborhoods and demolish homes and dairies.

In Conclusion:

The better route through the above described area would be to follow the green route beginning in Rainbow Valley to approximately Hazen Road and then follow the orange route along Hwy 85 to I-10.

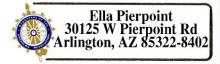
Thank you,

Roy P Pipint

Roy D. Pierpoint, President

Ella L Prespont

Ella L. Pierpoint, Sec'y Treas.



PHOENIX AZ SS2

Interstate II Juer I EIS Study Jean C/O ADOT Communications 1655 W. Jackson St. mail Drop 126F Phoening, AZ 85007

85007-327999

server and the server

June 16, 2019

Dear I-11 ADOT Study,

My husband and I are vehemently opposed to the planned I-11 Corridor between Twin Buttes and El Toro roads. This highway will destroy beautiful desert scenery, wildlife, peace and quiet in our neighborhoods, and most of all our property values.

Property is one of the greatest assets most families have. If the implementation of I-11 is allowed, this will have a devastating effect on personal wealth and on the overall values of the communities involved.

Our area is home to spectacular terrain, wildlife, and plant life anywhere. I-11, whether right on top of us or a mile away, will destroy that beauty. The natural home of all of the wildlife and birds would be destroyed—*permanently*.

We oppose the recommended route of the I-11 corridor, which threatens many families, private property, wildlife and the rural character and natural resources we treasure. Surely there is another route that would not have such a negative impact on so many.

Sincerely,

John W. and Christine A. Pigott Rancho Buena Vista Sahuarita, AZ. June 16, 2019

Dear I-11 ADOT Study,

My husband and I are vehemently opposed to the planned I-11 Corridor between Twin Buttes and El Toro roads. This highway will destroy beautiful desert scenery, wildlife, peace and quiet in our neighborhoods, and most of all our property values.

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We oppose the recommended route of the I-11 corridor, which threatens many families, private property, wildlife and the rural character and natural resources we treasure. Surely there is another route that would not have such a negative impact on so many.

Sincerely, John W. and Christine A. Pigott

Rancho Buena Vista Sahuarita, AZ.



MEDIA RELEASE



Contact: Beth Gorman (520) 724-7446 (520) 603-0358 (c)

FOR IMMEDIATE RELEASE

Health-affecting air pollution season arriving soon

Pima County, Ariz. (April 16, 2019) – Inflamed airways, difficulty breathing, coughing and increases in asthma attacks are some of the health effects that can occur by breathing elevated levels of ground-level ozone air pollution. Last year, the air in Pima County violated the U.S. Environmental Protection Agency's ozone standard for the first time in the 44-year history of Pima County Department of Environmental Quality's air quality monitoring. With the help of the community, and Mother Nature, ozone levels could stay in the healthy range this year.

"Ozone is one of the most complex air pollutants we monitor at our department," said Ursula Nelson, PDEQ Director. "It's created during a photochemical reaction with two other pollutants when the weather conditions are just right. Ozone needs intense sunlight, still air and the right ratio of volatile organic compounds and nitrogen oxides," Nelson said. "We can't change the weather, but if we can reduce the emissions that contribute to ozone, we may be able to prevent some of the ozone formation this season."

Ground-level ozone, as opposed to the ozone layer that protects us from the solar radiation, tends to be elevated from April through September. The U.S. EPA reviewed health studies in 2015 and determined that the ozone standard needed to be changed to make it even more protective of public health. Last year, ozone levels exceeded the EPA standard four times which was enough to violate the standard.

If ozone levels are high, again, this summer, EPA could designate eastern Pima County as "nonattainment" for the ozone standard which may require restrictions on some business that want to expand or move here. "There are many actions we can take as individuals to reduce the emissions that contribute to ozone creation," said Beth Gorman, Senior Program Manager for PDEQ. "Some of the best ways are to maintain our vehicles, refuel in the evening, share rides, and drive and idle our vehicles less. If enough people incorporate these changes into their lives, we can help keep our community healthy -both physically and economically," Gorman said.

Real-time <u>ozone air pollution levels</u> are available on the PDEQ website and individuals can sign up with the Arizona Department of Environmental Quality to receive <u>air pollution forecasts</u> in order to plan ahead to reduce exposure and drive less on forecasted high ozone days.

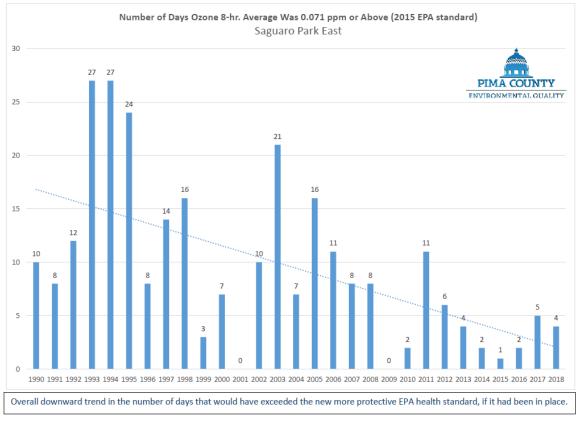
Additional information on ground-level ozone is available on the <u>PDEQ website</u> and graphs of historic ozone information are included on the following page.

Historic Ground-level Ozone at Saguaro Park East

(three-year average of the 4th highest 8-hour average in ppm = compliance determination)



If the 2015 Ozone Standard Had Been In Place Since 1995



###

Pima County Department of Environmental Quality (PDEQ) serves Pima County residents by protecting public health and the environment. PDEQ monitors air and water quality; provides hazardous and solid waste programs that ensures waste minimization and pollution prevention; assesses environmental compliance; processes environmental permits and plans; responds to public complaints and inquiries with investigations and enforcement; and reaches the community via public outreach, education, and citizens' assistance.

U. S. History/Native American Studies

Pollock, D I-837

A book every fan of western lore, every military aficionado, Indian ethnologist and historical detective must add to their library.

Early on the morning of November 5, 1871 seven passengers continued on their journey toward Ehrenberg, Arizona Territory. One hour west of Wickenburg their stagecoach was attacked. The driver and five men were murdered. A seventh man and the only female passenger escaped, though severly wounded.

Sixteen hours later a rescue party recovered the bodies of five victims 'drenched in blood, rigid in death'. A pursuit posse followed closely behind and the following day the Army's investigation began.

The result of that inquiry presaged a campaign that would punish the guilty and alter the fate of nearly every Indian in America's southwest.



R. Michael Wilson, in a masterwork of research and analysis, presents a convincing case for WHODUNIT. A comprehensive re- examination of the evidence - long overdue.



\$12.95



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I 11 Draft Tier 1 Environmental Impact statement

1 message

Dee Pollock <robertdeepollock@gmail.com> To: Dee Pollock <robertdeepollock@gmail.com>

Thu, May 2, 2019 at 6:05 PM

Dear I 11 Tier 1 EIS Study Team c/o ADOT Communications:

I would like to share the shock and disbelief of our community regarding your proposed freeway through our part of the desert that connects to highway 93 N. just beyond the Vista Royale subdivision consisting of hundred and 60 luxury homes.

First, our subdivision was a historical ranch in the late 1800s and early 1900s located about 7 miles Northwest of Wickenburg. There is a tremendous water pool underneath our land, hence the ranch was quite successful. The parcel was sold with the expectation it would be quite successful as an isolated piece in the middle of an enormous landscape of Arizona state lands. Lo and behold your freeway takes direct aim at the western boundary of Vista Royale and completely cuts off the entire community to desert access much less the proximity will destroy the peace and quietness much less our ability to ride horses, as many do, in Vista Royale on our morning rides in the desert.

We all find this simply unbelievable when transportation has flat, usable, 15 mi.² of desert with only creosote bushes and rattlesnakes. The alternative is ridiculously obvious. Unlike typical neighborhood disputes with road transportation, there is no loser in this case study wherein you move your approach towards or at Highway 71 Turn off to Congress and do not destroy historical sites, vital wildlife water tanks Nor the enormous economic impact of a lovely quiet beautiful subdivision isolated and surrounded by state lands in the middle of nowhere.

Your approach as you take off from highway 60 near the Wickenburg airport is on the path of utter destruction of three areas: first, the famous historical Wickenburg massacre site which I've included documentation as attachments herein. Second, vital waterways, three tanks to be exact with the largest of them, The only one that retains water all year. Three., The economic disaster of land values to a simply beautiful and peaceful Vista Royale subdivision for obvious reasons. Taking your proposed highway west three or 4 miles out from Vista Royale or 7 miles to the highway 71 interchange is so obvious we as a community are shaking our heads in utter and total disbelief.

Neighbors have called your department and received comments such as Wickenburg city Council desire your proposed route to allow closer access to the town. Nothing could be further from the truth. The mayor spoke of this at your study session a few days ago. Furthermore, I had dinner with one all of the senior counselors on our Wickenburg city Council and he said the entire counsel is in favor of the 71 interchange connection so I ask, why in the hell are you targeting a populated area within a 100 yards or so, destroying desert wetlands, and tearing up an historical massacre site?

Thank you,

Dee Połłock 35850 S. Gołd Rock Cir. Wickenburg, Arizona landline 928 – 684 – 6887



I-11 DRAFT TIER 1 ENVIRONMENTAL IMPACT STATEMENT AND PRELIMINARY SECTION 4(f) EVALUATION (DRAFT TIER 1 EIS)

Nogales to Wickenburg

COMMENT FORM

Thank you for participating in the I-11 Draft Tier 1 Environmental Impact Statement public comment process.

The Arizona Department of Transportation (ADOT) and the Federal Highway Administration (FHWA) encourage all interested parties to submit comments on any aspect of the Draft Tier 1 EIS. ADOT and FHWA will consider all comments in preparing the Final Tier 1 EIS, which will include responses to all comments received during the Draft Tier 1 EIS comment period, and will identify a Preferred Alternative (either a Build Alternative or the No Build Alternative).

When submitting comments, please be as specific as possible and provide details on your concerns and recommendations.

It is helpful to ADOT and FHWA to receive comments on:

- Any alternative or mitigation measure you support or oppose and why
- The analysis of environmental impacts and performance of alternatives
- Information you believe is incomplete or incorrect

Please print your comments below. Comments must be received or postmarked by July 8, 2019.

Contact Information (optional)
Name ______ Email ______

Contact Information (optional)
Name ______ Email ______
City _____ State _____ ZIP _____
Pursuant to Title VI of the Civil Rights Act of 1964, the Americans with Disabilities Act (ADA) and other nondiscrimination laws and authorities, ADOT does

not discriminate on the basis of race, color, national origin, sex, age, or disabilities Act (ADA) and other nondiscrimination faws and authorities, ADOT does not discriminate on the basis of race, color, national origin, sex, age, or disability. Persons who require a reasonable accommodation based on language or disability should contact Laura Douglas, ADOT Community Relations Project Manager, at 602.712.7683 or Idouglas@azdot.gov. Requests should be made as early as possible to ensure the State has an opportunity to address the accommodation.

有关中文信息, 请致电 1-844-544-8049.

Federal Highway

CONTACT

MAIL: I-11 Tier 1 EIS Study Team • c/o ADOT Communications • 1655 W. Jackson Street, Mail Drop 126F • Phoenix, AZ 85007 EMAIL: I-11ADOTStudy@hdrinc.com | PHONE: 1-844-544-8049 (Toll-free/bilingüe) | WEBSITE: i11study.com/Arizona



ADOT Project No. 999 SW 0M5180 01P | Federal Aid No. 999-M(161)S i11study.com/Arizona



PROYECTO DE DECLARACIÓN DE IMPACTO AMBIENTAL DE NIVEL 1 DE LA INTERESTATAL I-11 Y EVALUACIÓN PRELIMINAR DE LA SECCIÓN 4(f) (PROYECTO DE EIS DE NIVEL 1), de Nogales a Wickenburg

FORMULARIO DE COMENTARIOS

Gracias por participar en el proceso de comentarios públicos sobre el proyecto de declaración de impacto ambiental de nivel 1 de la I-11.

El Departamento de Transporte de Arizona (ADOT) y la Administración de Autopistas Federales (FHWA) invitan a todas las partes interesadas a enviar sus comentarios sobre cualquier aspecto del proyecto de ElS de nivel 1. ADOT y FHWA tendrán en cuenta todos los comentarios al preparar la versión final de ElS de nivel 1, que incluirá las respuestas a todos los comentarios recibidos durante el periodo de comentarios sobre el proyecto de ElS de nivel 1 e identificarán una alternativa preferida (una alternativa a favor de la construcción o la alternativa en contra de la construcción).

Al enviar sus comentarios, sea lo más específico posible y proporcione detalles sobre sus inquietudes y recomendaciones.

A ADOT y FHWA les resulta útil recibir comentarios sobre:

- cualquier alternativa o medida de mitigación que usted apoye o no apoye, y por qué;
- el análisis del impacto ambiental y el rendimiento de las alternativas;
- la información que cree que está incompleta o es incorrect

Escriba sus comentarios en letra de imprenta a continuación. Los comentarios se deben recibir o sellar antes del 8 de julio de 2019.

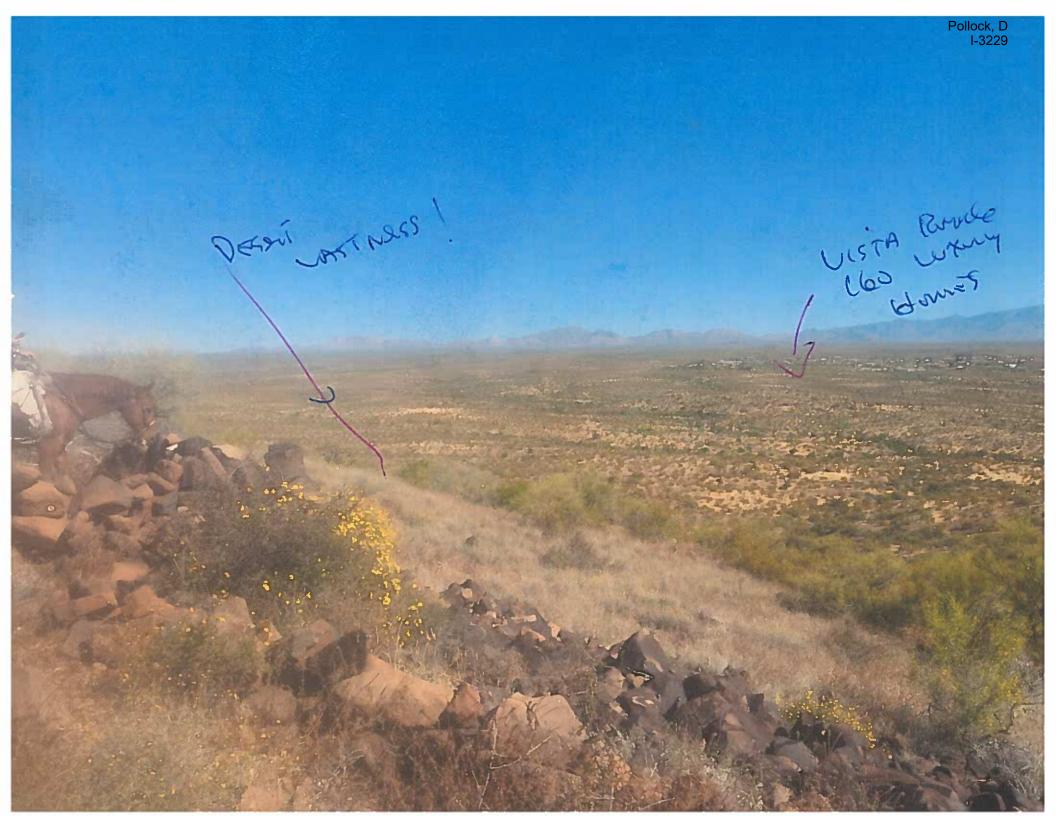
Información de contacto (opcional)
Nombre ______Correo Electrónico ______
Dirección ______Estado ______Estado ______Código Postal ______

De acuerdo con el Título VI de la Ley de Derechos Civiles de 1964, la Ley de Estadounidenses con Discapacidades (ADA, por sus siglas en inglés) y otras normas y leyes antidiscriminatorias, el Departamento de Transporte de Arizona (ADOT) no discrimina por motivos de raza, color, origen nacional, sexo, edad o discapacidad. Las personas que requieran asistencia (dentro de lo razonable), ya sea por el idioma o por discapacidad, deben comunicarse con Laura Douglas al teléfono 602.712.7683 o a Idouglas@azdot.gov. Las solicitudes deben presentarse lo antes posible para permitir que el Estado tenga la oportunidad de disponer las medidas necesarias. 如需中文文件请致电 1-844-544-8049

CONTACTO

CORREO POSTAL: Equipo del estudio de la EIS de nivel 1 de la I-11 • a/c Comunicaciones de ADOT • 1655 W. Jackson Street, Mail Drop 126F • Phoenix, AZ 85007 CORREO ELECTRÓNICO: i-11ADOTStudy@hdrinc.com | TELÉFONO: 1-844-544-8049 (línea gratuita/bilingüe) | SITIO WEB: i11study.com/Arizona







Dee Pollock <robertdeepollock@gmail.com>

I 11 Proposed freeway

1 message

Dee Pollock <robertdeepollock@gmail.com> To: Lori Horcos <lhorcos@gmail.com> Bcc: robertdeepollock@gmail.com Mon, Apr 22, 2019 at 11:41 AM

Pollock, D I-3229

Hi neighbors...

Please note the attached satellite photos and how close the new proposed freeway comes to our state land boundaries. This will have an enormous economic impact in terms of property values unless we are able to make an impact at the next meeting. Which, shall be held in Wickenburg at the community center 4 PM, April 30, 2019.

Please call or email me if you have any questions.

Sincerely,

Dee Pollock 406-261-6887

3 attachments



IMG_0010.PNG 462K

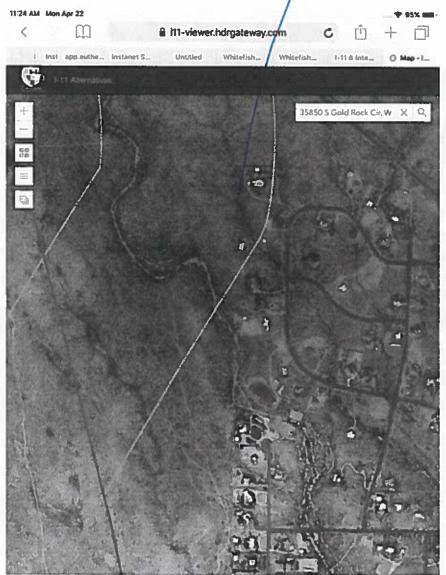
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Our Home



VISTA Revere > Limé Removée!

USDA FSA | County of Yanapai, Est, HERE, Garmin, INCREMENT P. METVYIASA, USOS, Durabil bl Lund Management, EP. Powered by





Dee Pollock <robertdeepollock@gmail.com>

Environmental impact proposed I 11 freeway

1 message

Dee Pollock <robertdeepollock@gmail.com> To: Lori Horcos <lhorcos@gmail.com> Bcc: robertdeepollock@gmail.com Mon, Apr 22, 2019 at 1:01 PM

Hello neighbors

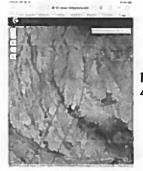
It is me again what the satellite photo of the proposed freeway literally Will destroy the water tank area located a little over 1 mile from our Vista Royale neighborhood.

This is a vital water area for a multitude of wildlife. There is water in this tank area about 95% of the time. All other tanks for a 12-15 sq mile area completely dry up in the late summer months. At a bare minimum, you would hope transportation would honor this desert wetlands area and move it just a few miles west of the tank and have minimal environmental damage. As frequent visitors to the desert on foot, horseback at ATV we have on many occasions Watched waterfowl... Cranes, Herron's, geese, ducks, and even pelicans that frequent this tank during migration also, dear, javelina, bobcat, ring tail cat, coyotes, river toads and Rare occasions the tortoise!.....this is what you are destroying.

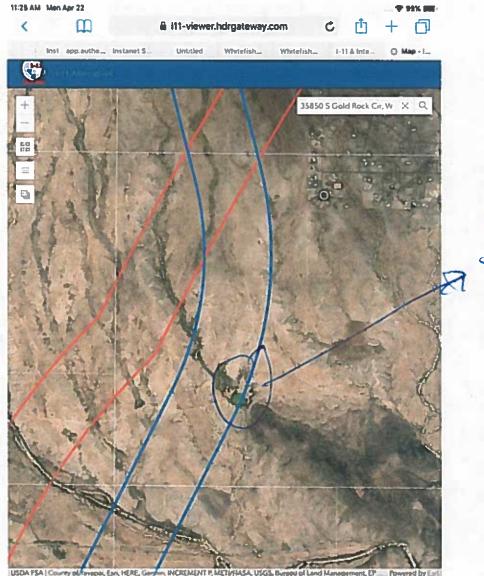
What a huge environmental impact that can easily be avoided to move this proposed freeway to intersect with Highway 71 that connects to Congress and a gala without disrupting enormous amount of wildlife much less the huge impact to the Vista Royale residence.

For your information the GPS bearings for the tank 34 0' 52" N 112 50' 59" W

Sincerely, Dee Pollock



IMG_0013.PNG 497K



A tank

Dee Pollock <robertdeepollock@gmail.com>

Mon, Apr 22, 1:48 PM (7 days ago)

to I-11ADOTStudy, bcc: me, bcc: Bonnie, bcc: Jim, bcc: Ellingwood, bcc: Beth, bcc: Debbie, bcc: Vikki, bcc: Earl, bcc: Debbie, bcc: Lewis

Satellite photo of the proposed freeway literally will destroy the water tank area located a little over 1 mile from our Vista Royale neighborhood.

This is a vital water area for a multitude of wildlife. There is water in this tank area about 95% of the time. All other tanks for a 12-15 sq mile area completely dry up in the late summer months. At a bare minimum, you would hope transportation would honor this desert wetlands area and move it just 3 miles west of the tank and have minimal environmental damage. As frequent visitors to the desert on foot, horseback at ATV we have on many occasions Watched waterfowi... Cranes, Herron's, geese, ducks, and even pelicans that frequent this tank during migration also, dear, javelina, bobcat, ringtail cat, coyotes, river toads and Rare occasions the tortoise!.....this is what you are destroying.

What a huge environmental impact that can easily be avoided to move this proposed freeway to intersect with Highway 71 that connects to Congress and a gala without disrupting the enormous amount of wildlife much less the huge impact to the Vista Royale residence.

For your information, the GPS bearings for the tank 34 0' 52" N 112 50' 59" W. If interested, will send pictures of the small lake. Hopefully, we can work through this in a peaceful manner. If it turns adversarial and/or you do not return comments to me and for all of the people in our area there will be one hell of a good fight. For starters, we shall contact every environmental organization in the state of Arizona and, without a doubt, employ the services of a good environmental lawyer. Obviously, our objective is to get the roadway changed to the intersection of Highway 71 and 93 N. In the short run, even 3 miles west of the wetlands area would put you in dry desert land of nothing but creosote bushes.

Sincerely, Dee Pollock 35850 S. Gold Rock Cir. Wickenburg, AZ 85390 home landline: 928-684-9671 email address: robertdeepollock@Gmail.com

Pollock, D I-3229

Desat wet comps ... out b 3 tanks that will be Destrayers.



Wickenburg massacre site information

1 message

Dee Pollock <robertdeepollock@gmail.com>

Thu, May 2, 2019 at 5:05 PM

To: I-11ADOTStudy@hdrinc.com

Bcc: Dee Pollock <robertdeepotlock@gmail.com>, Bonnie Pollock <pollockbonnie@earthlink.net>, Jim & Bobbie Allen <bjallenwa@gmail.com>, Beth Myerson <myerbd@gmail.com>, Lori Horcos <lhorcos@gmail.com>, Elaine Lekas <elaine@realtorelaine.com>, Earl & Jane Coleman <janecoleman@wyoming.com>, Vikki & Dean Sandvik <niwaca2@springsips.com>

Dear Sirs:

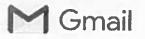
I, along with nearly all of my neighbors attended your public hearing held at the Wickenburg Community Ctr., Tuesday, April 30, 2019.

Among the many things that the participants discussed at their three-minute time allotment, we missed sharing some really disturbing news regarding your proposed route from Highway 60 North of the Wickenburg airport to highway 93 N. ADOT will completely destroy a wonderful famous historical site with the following bearings: 33 59' 22" N 112 51' 12" W. I can only hope that you people will recognize this impact. Not only will your proposed freeway destroy the entire site, access, should you change your route, would still be completely cut off to the public like ourselves that live in the Vista Royale subdivision (34 1' 48" N 112 50' 38' W) or access from highway 60. Either by horse or an ATV, we see I half a dozen people or more each weekend traveling to see this wonderful site... Easily over 100 or more in a typical year.

Under separate cover, I am sending you pictures and historical information for documentation purposes.

Thank you, and I look forward to hearing from you before we take our issue to other authorities.

Dee Pollock 35850 S. Gold Rock Cir. Wickenburg, Arizona landline... 928 – 684 – 6887



Fwd: 1937 department of Arizona highway marker on highway 60 near the Wickenburg airport

1 message

Dee Pollock <robertdeepollock@gmail.com>

Thu, May 2, 2019 at 5:09 PM

To: I-11ADOTStudy@hdrinc.com

Bcc: Dee Pollock <robertdeepollock@gmail.com>, Bonnie Pollock <pollockbonnie@earthlink.net>, Jim & Bobbie Allen

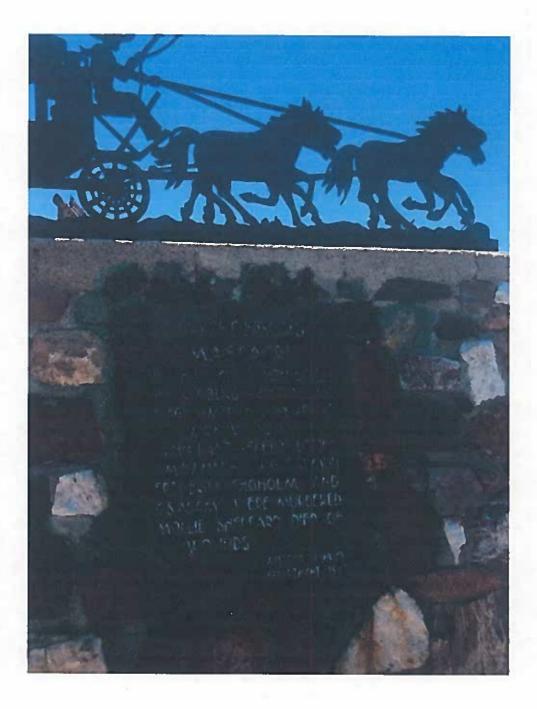
 <lhorcos@gmail.com>, Vikki & Dean Sandvik <niwaca2@springsips.com>, Earl & Jane Coleman <janecoleman@wyoming.com>

 Forwarded message -From: Dee Pollock <robertdeepollock@gmail.com> Date: Thu, May 2, 2019 at 4:21 PM Subject: 1937 department of Arizona highway marker on highway 60 near the Wickenburg airport To: Dee Pollock <robertdeepollock@gmail.com>



IMG_1247.JPG 108K

Hiven 60 Near Wichen Bury Airport. 1937 Robardo Marken By A.J. Dent. B Wigh WANS.



Dee Pollock <robertdeepollock@gmail.com>

Fwd: Wickenburg massacre site documentary information

1 message

Dee Pollock <robertdeepollock@gmail.com> To: I-11ADOTStudy@hdrinc.com

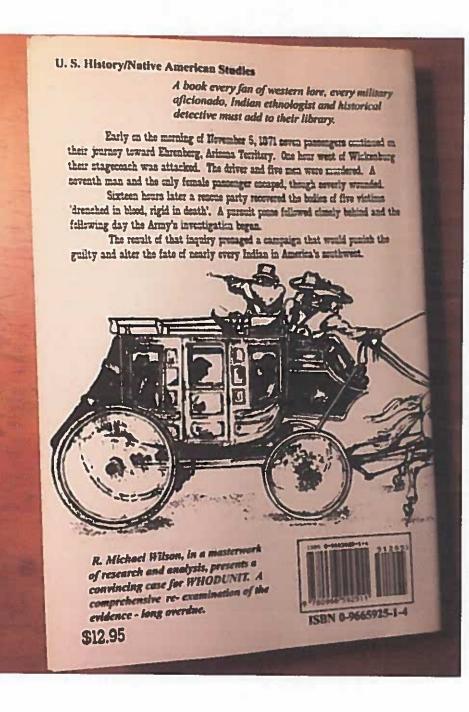
Thu, May 2, 2019 at 5:07 PM

------ Forwarded message ------From: **Dee Pollock** <robertdeepollock@gmail.com> Date: Thu, May 2, 2019 at 4:43 PM Subject: Wickenburg massacre site documentary information To: Dee Pollock <robertdeepollock@gmail.com>



IMG_1254.JPG 131K

Pollock, D I-3229



22



Fwd: Grave marker placed by the local Wickenburg historical Society at the historical Wickenburg massacre site

1 message

Dee Pollock <robertdeepollock@gmail.com>

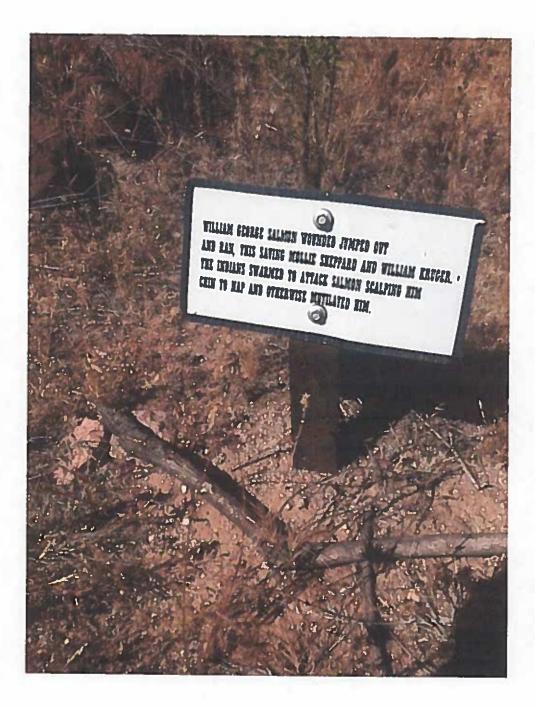
Thu, May 2, 2019 at 5:10 PM

To: I-11ADOTStudy@hdrinc.com

Forwarded message -------From: Dee Pollock <robertdeepollock@gmail.com> Date: Thu, May 2, 2019 at 4:22 PM Subject: Grave marker placed by the local Wickenburg historical Society at the historical Wickenburg massacre site To: Dee Pollock <robertdeepollock@gmail.com>



IMG_1248.JPG 187K



-1



NNIE & DEE POLLOCK oldrock Circle, Wickenburg, AZ 85358

National Park



1-11 Tier 1 ELS Study TRAM CLO FIDOT COMMUNICIPUE 1655 W. Joschson street PROCNIT, AZ 85007

ATTERE: MAIL Drop 126F

To ADOT and FHWA,

We are greatly angered and saddened by the Recommended Alternative route described in Tier 1 DEIS for Interstate 11, especially the portion that runs through rural Avra and Altar Valleys. We support the No-Build Alternative for I11 or no I11 at all. We oppose using 3.4 billion dollars in taxpayer money to pay for building a stretch of brand new super highway from the border to Casa Grande rather than co-locating I11 with I-19 and I-10 through Tucson, or upgrading the existing railroad's capacity. We would rather see such funds go to the repair and maintenance of all the neglected roads in the state. We would also rather see some of that 3.4 billion dollars go toward protecting and maintaining our underfunded public lands, rather than assaulting them, as the DEIS Tier 1 Recommended Alternative Route would.

After attending multiple presentations to the public by ADOT and FHWA, plus listening to a public hearing held in May, we can't think of any true benefits to the people of Arizona that aren't far outweighed by negative impacts. Even the so called benefit of planned high growth areas in Maricopa County sound like a nightmare. Whose water are they going to take to get what they'll need?

Southern Arizona has much to lose in choosing the recommended route:

- The Recommended Alternative route runs so close to protected federal and tribal lands west of the Tucson Mountains that it may just as well plow directly through the center of them. Saguaro National Park West and Ironwood National Monument boundaries lie 1,300 ft. and 400 ft. respectively from the recommend I-11 route. The route runs close to Tucson Mtn. Park which flies in the face of Pima County's Sonoran Desert Conservation plan Section 10. Noise, air, and light pollution due to heavy truck traffic are incompatible with protected wild land health and habitat, with visitor experience and attraction of tourist dollars, and with the mental and spiritual wellbeing of the Tucson community.
- Wildlife corridors linking mountain ranges, from Wickenburg to Mexico, are a vital part of the region's ecology. The Recommended Alternative route in the Avra Valley west of Tucson transects wildlife corridors between the Tucson Mountains and the Ironwood Forest Natl. Monument and the Waterman Mountains. This is not acceptable.
- Routing I-11 through the Tucson Mitigation Corridor (implemented as a required mitigation for the federal CAP canal) is cynical and outrageous.

Attempting to mitigate the destruction of a pre-existing mitigation defeats the purpose for which those lands were set aside. What's the point of mitigation in the first place if it's not upheld? All this reminds us of the Wild West "treaties" the federal government made and routinely broke with Native Americans, and progressively still make in regards to wildlife.

- The potential for groundwater pollution due to chemical spills, routine freeway runoff, and the inevidable development of urban sprawl in the Avra Valley threatens Tucson's water supply. The Tucson Valley already suffers the effects of groundwater contamination, subsidence, and diminishing quantities of Colorado River water. Tucson depends on groundwater that is collected in Avra Valley recharge basins and stored in the aquafer directly below the Recommended Alternative Route.
- The proposed route usurps private property rights of thousands of property owners and will displace many low income families and seniors.
- Our legacy for future generations will be the remaining wild lands we manage not to destroy. The I-11 Recommended Route would be a legacy to big money interests and corporate oligarchy.

Signed,

Debra Christine Poole (Tucson, AZ) and Junardi Armstrong (Tucson, AZ)









Interstate 11 Project

5/29/2019

To Whom it may concern, I'm writing this letter to you and other officials involved in the proposed Interstate -11 freeway project. The reason for my concern is that my family has lived in the area where this freeway maybe constructed according to your on line maps, for more than 30 years. My wife and I moved to this area to raise a family of three children and our selves. We felt it was a better choice than raising our kids in the big city of Phoenix. My dad and myself started a small machine shop /repair shop in1983, we relocated to this address of 52397 W.Teel Rd. Maricopa, AZ. 85139 in 1986 constructing two buildings for the purpose of the business. We just received notice on are gate along with our neighbors 2 to 3 days after the public meeting were over with. We had no idea we were in the path of another major government project? We have already dealt with the CAP project coming thru are back yards, then we had the 525 KVA SRP power line from Palo Verde Nuclear generating station to east Mesa, AZ. come thru here and take the front portion of are property leaving us with a 150ft. tower in the yard . We had no choice on this , it was forced upon us.

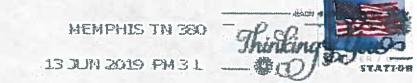
If me and my family are forced to relocate are home and business it will be a large expensive burden upon us that the government needs to pay for.Which would include cost of acreage ,a home ,two buildings for the business ,moving of heavy machinery weighing as much as 28,000 lbs. 3 phase electrical power etc.

The better alternative ,less expensive route in orange on the maps that follow Interstate 8 would be a much better choice. Maybe then taking the excess funds and use them on Hwy.347 Maricopa rd. to expand it. With a population of approximately 50,000 people in this area trying to travel into Phoenix it is truly needed.

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Sincerely, David Potillo

David Potillo 52397 W. Teel Rd. Maricopa, AZ. 85139



1-11 Tier 1 EIS Study Team do ADOT Communications 1655 W. Jackson Street Mail Drop 126F Phoenix, AZ. 85007 To: Arizona Department of Transportation

Subject Interstate 11 Tier 1 Environmental Impact Statement Corridor Study – Final Comments (H.R. 1612 - Intermountain West Corridor Development Act of 2015)

In addition to the very brief and impromptu recorded statement I provided on May 11th at the I-11 Public Meeting at Marana High School, following are my final comments on the Tier 1 EIS.

Let me start by saying that I am not convinced that Arizona needs another Interstate. However I recognize that there are those in Arizona who want another Interstate. What we really need is water. Southern Arizona's water supply cannot support the population growth that some studies predict. "Finally, water remains a concern for the long run. Shortages in the West have the potential to drive up residential and business costs and restrict growth." (excerpt from Arizona Third Quarter Economic Outlook Update 30-Year Long-run Forecast Horizon By George W. Hammond, Ph.D., Director and Research Professor, EBRC, September 1, 2017). Water can be incorporated into a transportation plan, especially commercial transportation, to relieve future crowded roadway conditions. The plan may be expensive up front but the abundant future benefits would be well worth the initial efforts. I don't know how many times I have heard folks joke, whenever there is seasonal flooding in other portions of the United States, that what we need is a system to re-distribute the water. It's no joke and I am not the only one who thinks that.

I-II Corridor in General

Although a No-Build Corridor Alternative is solicited as a consideration, I understand that in reality it is actually only being used as a base plan for comparison purposes and the decision is already made to construct a Build-Corridor to serve as a mostly commercial route to connect trade between Canada, USA and Mexico via Las Vegas NV, and divert commercial traffic from California's Interstate 5.

The Las Vegas to Mexico connection does not necessarily have to include the Tucson area for it to serve its stated purpose. Therefore, my input is basically the same as it was at the beginning of this scoping process, which is: There is no need for another Interstate through Arizona. Not now and not in the foreseeable future.

My only comment in support of a Build-Corridor would be the possible need for a new State Route from the existing SR93 to I-10 using as much existing roadway as possible and connecting as soon as possible (Wickenberg Road/355th Avenue). Since there is an existing Phoenix Bypass Route, it is obvious that it has been previously determined that it is desirable to re-route commercial vehicles around the city of Phoenix. Therefore, it makes sense to divert commercial vehicles from Las Vegas onto the existing Phoenix Bypass Route (SR85) off of I-10 near Buckeye.

However, deviating from any currently proposed Build-Corridor, in my opinion it would be 'best' to use the existing SR85 as a Build-Corridor Alternative. This route is already in place and is a direct route into Mexico. It is logical to travel straight down the Phoenix bypass route of SR85 south of Phoenix, through Gila Bend. Continue to run the bypass straight down SR85, through the Organ Pipe Cactus National Monument into Lukeville AZ at the border to Mexico. The cactus and wildlife disposition will be minimal. "...the ultimate I-11 facility would be approximately 400 feet wide." (*excerpt from Study Overview at i11study.com*). SR85 is already a designated Phoenix bypass route and it would serve the same purpose for Tucson. Seriously improve/expand the SR85 to accommodate commercial and tourist travel. Any commerce that is specifically slated for Casa Grande, Marana, Tucson, Nogales, New Mexico and Texas can use I-8 as they do today. As I am sure you are aware, I-8 is presently a very under-utilized Interstate (I travel from south of Tucson to Gila Bend once a month).

It would be insanity to approve a Build-Corridor from Buckeye to Casa Grande, through Stanfield and other towns, just to improve drive time.

We have existing Interstates 8, 10 and 19; extensive State Routes 93 and 85, numerous railways of different types (including Burlington Northern, Union Pacific and Amtrak), 3 International Airports and a number of Municipal Airports that are more than capable of facilitating the transportation of supplies and tourists to and from the Kingman, Gila Bend, Phoenix, Casa Grande, Marana, Tucson, and Nogales areas.

I-II Corridor from Marana to Nogales

This is the area that affects me directly as the Build-Corridor Alternatives will run along South Sierrita Mountain Road and cut east around the Sierrita Mountains where I live, seriously disturbing the peace and quiet and beauty of God's country.

To: Arizona Department of Transportation

Subject Interstate 11 Tier 1 Environmental Impact Statement Corridor Study – Final Comments (H.R. 1612 - Intermountain West Corridor Development Act of 2015)

From the meetings I have attended, it would appear that the majority of area residents (myself included) do not have a need for, nor want, another Corridor cutting north/south from Casa Grande to Nogales. Further, it does not appear to me that ADOT and FHWA are seriously listening to the outcry of opinions and concerns from actual residents within the proposed Build- Corridor areas; therefore, unfortunately I believe that our many opinions and concerns are not being seriously considered.

As area residents, we are the folks who have chosen to live west of the Tucson Mountains for a number of reasons. My family's reason is because this sparse area represents the epitome of all that we love and live for, the lifestyle that is ours and the environment in which we wish to continue our family legacy. We need the freedom from "city life", solitude from the crazy world we live in, a connection to this earth, room to raise our livestock and our family...peace and quiet. All of this will be forever ruined when **any** Build-Corridor comes through on the west side of the Tucson Mountains.

However, since you do have a want to run a highway around the Sierrita Mountains, I hope that you would provide access near the town of Robles Junction to the highway, easing our travel to the Sahuarita area, Right now there is no public path over the mountains.

Our opinions and reasons are no less important than government and corporate opinions and reasons, but alas they do not seem to hold the same weight in the environmental impact study process. Fish & Wildlife, US C&BP, Cities, Counties, Tribal government and environmental alliances all fall under the classification of organized group or government entity. These are the types of stakeholders whose comments and ideas take priority when it comes to ADOT and FHWA listening to, and working with, all stakeholders to help define a Build-Corridor (or No-Build Corridor) Alternative. I understand that there are existing regulations in place to protect those areas, but what about protecting the areas of human habitat. It is my opinion that protecting human habitat is just as important as protecting habitats for plants and other creatures of this earth.

Obviously the area tribal government also does not find a need for, support, nor want a Build-Corridor because they are not allowing construction to cross tribal land to do so. The same holds true with state/national parks and wildlife sanctuaries. In order to work with these entities, ADOT and FHWA has honored their wishes and concerns and routed the corridor alternatives around their areas; you call it mitigation. In doing so you are instead encroaching on residents' homesteads and the serenity of our lives. I am wondering why ADOT & FHWA are not seriously interested in the views of the folks who are actually affected the most by the impact of a Build-Corridor in our neighborhood. This disregard to resident input is contrary to the intent of the process; the reason for holding public meetings, and is absolutely in violation of the intent of the regulations that require the study/input process in the first place (the Tier 1 Environmental Impact Statement (EIS), required by the National Environmental Policy Act (NEPA)).

Other Things to Consider

- The Study's projected use of highways may be exaggerated due to the ever rising cost of vehicles, coupled with the ever increasing cost of government regulations required to maintain use of vehicles (registration/title/license/insurance/maintenance). Future use of vehicles will see a more limited increase due to the ballooning lower class in this country not being able to afford a vehicle (similar to the way many now can no longer afford to buy homes).
- 2. The relevance of evacuation due to disaster is unfounded. This area of the country is not vulnerable to disasters such as tornado, flood, earthquake or hurricane. This area of the country is vulnerable to drought, airstrikes, war and martial law. Drought does not require evacuation of the population; people will go willingly one by one. Airstrikes/war will be countered by the numerous US armed forces stationed within this state. Additionally, there can be no evacuation from an airstrike/war because once it happens it's too late for evacuation. Even if disaster evacuation was a factor, rail, air and bus would be the fastest and most effective vehicles to evacuate people; not a highway system.
- The benefits of a Build-Corridor are limited to the shipping and warehouse industries, a limited percent of the construction industry during construction of the Corridor, and ADOT maintenance personnel after the Corridor is complete.

To: Arizona Department of Transportation

Subject Interstate 11 Tier 1 Environmental Impact Statement Corridor Study – Final Comments (H.R. 1612 - Intermountain West Corridor Development Act of 2015)

- 4. The benefits to the southernmost portion of the proposed Corridor are limited to gas station/truck stop, trucking and warehouse jobs. Very few area residents will benefit from this new commerce because we are farmers and cattle ranchers, or we have already made a great life here and love it just the way it is. We made a choice to live rural and the reasons for that choice will be destroyed by a Build-Corridor to and through our communities.
- 5. The preferred Build-Corridor Alternative will bypass the municipalities of Marana and Tucson and will take away existing commerce along I-10 created by travelers, i.e. existing gas stations, motels and restaurants. In contrast, the diversion of commercial traffic via an expanded and improved SR85 between Gila Bend and Lukeville would only take away commercial traffic whose destination is into Mexico and would not impact Casa Grande, Marana, Tucson and Nogales existing commerce. Vehicles that are destined for Mexico would not be traveling with tourists on Interstates 8, 10 and 19 and would not be adding burden to already congested US C&BP border crossing in Nogales.
- 6. With the (finally) ongoing expansion of I-10 lanes between Phoenix and Tucson, coupled with (consider a future) expansion of I-19 lanes between Tucson and Nogales, the existing Interstates could be made ample to handle traffic from Phoenix to Nogales. If you plan it correctly and thoughtfully. Wide frontage roads can be created between the exit ramps to handle more local traffic (check out TX-183 Airport Freeway in the Irving Texas area).
- 7. Tucson is a tourist town. That's all it has going for it...the 'Old Pueblo" in the "Wild, Wild West" (not necessarily a bad thing).
 - a. You will ruin the entire Tucson tourist experience by desecrating our beautiful land with a new Interstate. Tourists come here to get away from 'city life', to connect with the beauty of the natural habitat (harsh as it is sometimes) and the "wild, wild west". The same reasons as the residents who have chosen to live in this area, because of the land's serenity, beauty, wildlife and opportunity to be free in the open spaces. Even if the Build-Corridor is not in our backyard, it will still ruin our tourism and livelihood with its noise, lights and interference with hiking, views, and ATV recreation with the restricted east/west travel.
 - b. Tucson needs a fluid I-10/I-19 to bring in customers directly from Mexico, Texas and Phoenix.

There is another solution besides highway or railway. Waterway. I again submit my previous letter; a vision for new transportation and recreation system (see attached). The City of Tucson is beginning to see the value of waterways (see attached utility insert). If you're going to do something about north/south transportation, do something GREAT. Quit half-stepping it and goofing around like you are doing with the I-19/I-10 Interchange problem. Make a real, sustainable plan.

I have exerted much thought and taken the better part of my day to try to submit my thoughts to you in a way that you could comprehend and which would not offend you. I hope that you will seriously consider my points. Thank you for consideration and your time.

Respectfully,

Karen Potter S. Sierrita Mountain Rd. Tucson AZ USA karpott3@aol.com

CC:

- US Senator Martha McSally 404 Russell Senate Office Building, Washington DC 20510
- US Senator Kyrsten Sinema 317 Hart Senate Office Building, Washington DC 20510
- US Congressman Raul Grijalva AZ District 2- 1511 Longworth House Office Building, Washington, DC 20515

US Congressman Ruben Gallego - AZ District 7 - 1131 Longworth House Office Building, Washington, DC 20515

Sen Andrea Dalessandro – AZ Senale District 2-1700 W Washington St, Phoenix AZ 85007

Rep Rosanna Galbaldon - AZ House District 2-1700 W Washington St, Phoenix, AZ 85007

US Congressman Ann Kirkpatrick – AZ District 2- 309 Cannon House Office Building, Washington, DC 20515

US Congressman Paul Gosar - AZ District 4- 2057 Rayburn House Office Building, Washington, DC 20515

Rep Daniel Hemandez Jr – AZ House District 2-1700 W Washington St, Phoenix AZ 85007 President Donald Trump - The White House – 1600 Pennsylvania Ave, Washington DC 20500

From: karpott3 <karpott3@aol.com> To: I-11ADOTStudy <I-11ADOTStudy@hdrinc.com> Subject: Proposed High-Capacity, Controlled Transportation Corridor (aka I-II) Date: Sun, May 21, 2017 12:42 pm

I have some rough suggestions for your preponderance of the corridor from Las Vegas to Mexico, via the Nogales port of entry.

I ask you to consider a waterway. There appear to be viable waterways (some dried up) that make most of the distance between Las Vegas, NV and Nogales, AZ. Consider Roosevelt Lake, the Colorado, Verde, Agua Fria, Salt, Gila, and Santa Cruz Rivers. Possibly also throw in the Central Arizona Project (CAP) system route and the San Pedro River.

Water would be a welcome resource for most all concerned, therefore reducing resistance to the corridor as a whole. Consider the benefits of a waterway to riparian habitats, ranching, farming, residential (homes with views & water ports) and commercial (resorts) development, transportation (barges, cruise boats), tourism and recreation (cruises, nature watching, biking, hinting, hinting, fishing, swimming, camping), and renewed life to the desert vegetation and critters.

Waterway lighting would likely be sufficiently low so as not to interfere with Kitt Peak's continuing astronomy research.

We have been in such a long drought, with no reprieve in sight, that we actually need to do something about the lack of water in Arizona. Our washes used to run with water; now they don't. You should make it so they run again. Control the waterway if you need to; locks like the Panama Canal. Re-use the water if you need to via a pumped water line (like natural gas & fuel lines). Use the water from natural sources like the Colorado, snow from the mountains, rainwater. Maybe even figure out how to relieve the flooding in the eastern U.S. by bringing that water west where it is welcome and needed. Use the dirt from the construction of deeper/wider waterways to fill in below sea-level areas such as in New Orleans.

Many of the right of ways likely are already established. This would be a grand coordination between ADOT, US Army Corps of Engineers, Tribes and AZ Water Department. See http://www.azwater.gov/azd/wr/gis/

We don't need more highways in this beautiful desert of ours, but we could certainly use more water.

If you are going to something for us, do it all the way. Make something GREATIII

I never said this would be easy but it would be perfect.

Thank you in advance for your consideration of these rough suggestions. I hope you do not just 'blow-off' the suggestions, but that you actually think about the impact.

Sincerely, Karen Potter 17375 S Sierrita Mountain Rd Tucson, AZ karpott3@aol.com

CENTRAL ARIZONA PROJECT CANAL The CAP Canal has allowed the cities it serves to grow, even in arid country. It begins at the Colorado River and moves water uphill, from Lake Havasu (elevation 447 Agua Hassayampa Lake Fannin-McFarland Aqueduct CALIFORNIA Fria River Havasu Verde Length: 58 miles NEW MEXICO Mark Wilmer River River Width at bottom: 22-24 feet Parkero 17 Width at top: 78-80 feet Colorado River Bouse Hills Depth: 15.13-15.74 feet Lake New Pleasant Wage Bouse_O Waddell Little Hieroglyphic Waddell River Harquahala Mountains Hassayampa-Agua-O Fria Salt PHOENIX Tonopah Desert Fannin/McFarland Hayden-Rhodes Aqueduct 10 Length: 190 miles 60 Width at bottom: 24 feet Superstition Gila Width at top: 94 feet Mountains Depth: 16.43 feet River Santa River Cils River 8 Brady Gila -Picacho Cruz River Red Rock 0 yan pedro Yuma 10 **Tucson Aqueduct** Legend Length: 87 miles - Dam Lower MEXICO Santa Cruz-Width at bottom: 12-20 feet -0 Map area Tunnel **Twin Peaks** Width at top: 52-87 feet Sandario Brawley Tucson Pumping plant Depth: 14 feet Phoenix San Xavier Snyder Hill Black Mountain Recharge basin 0 Piver 10 25 miles **Pima Mine Road** 19

Potter, K

WORKING WATER

The Santa Cruz River Heritage Project

The Santa Cruz River has played a central role in the long history of this

region, sustaining communities with reliable spots of surface water for thousands of years. In the early 20th century, groundwater pumping for agriculture and urban growth put extreme stresses on the river, eventually leaving the riverbed in Tucson completely dry for most of the year—but that is about to change!

This June, Tucson Water will launch the Santa Cruz River Heritage Project,

reintroducing a ribbon of flowing water to an area just south of A Mountain and downtown Tucson. Each day, up to 2.8 million gallons of reclaimed water (please see sidebar — What is Recycled and Reclaimed Water?) will be released into the Santa Cruz, reviving a piece of the river's former beauty and vitality with a flow that is expected to travel more than a mile before soaking into the ground. Over time, bike riders, joggers, walkers, and equestrians along the downtown section of "The Loop" trail will see improved river conditions and flowing water to admire. This project will also complement historical and cultural community projects in the area such as Mission Garden, and support the return of native plant species and endangered wildlife.

CALL	CLICK	SOCIAL	TDD	WATCH
Public Information English & Español: (520) 791-4331	tucsonaz.gov/ water	FO	(520) 791-2639	C



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reliable ways. Re water cc reclaime into the northwe Water to as it con Santa Cr to bring south, w the grou stored fc



What is Recycled and Reclaimed Water?

Advanced technology makes it possible for communities to use water more than once—recycling it—before passing it back into the natural water cycle. Recycled water includes gray water, which is relatively clean wastewater collected from baths, sinks, and clothes-washing machines; reclaimed water, which is specially treated wastewater for applications such as irrigation, dust control, firefighting, and industrial uses; and stormwater.

To conserve drinking water, Tucson Water has provided reclaimed water to irrigate parks, schools, golf courses, and neighborhood landscapes since 1984. It is an important water resource and Tucson Water maintains more than 160 miles of pipe and 15 million gallons of surface storage in the reclaimed water system. Today, reclaimed water represents about 10 percent of our water resources.

For more information about reclaimed water in our community please visit tucsonaz.gov/water/what-is-reclaimed-water.

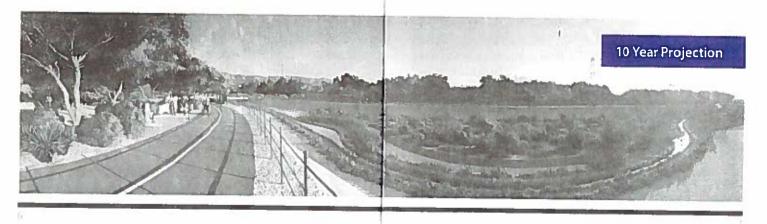
The benefits of the Santa Cruz River Heritage Project go far beyond the surface. The project is an

excellent example of how Tucson Water continues to ensure reliable water resources for our community in innovative ways. Recycling wastewater is one of Tucson's most important water conservation tools. Currently, only about half of Tucson's reclaimed water is used by customers. The excess is discharged into the Santa Cruz River farther downstream, near the city's northwestern edge. The location of that discharge causes Tucson Water to lose physical and legal control of this valuable resource as it continues to flow north and out of our water system. The Santa Cruz River Heritage Project will use existing in rastructure to bring a portion of that reclaimed water to a location farther south, where it will flow in the riverbed and percolate through the ground to enter the aquifer. Once in the aquifer this water is stored for later use, effectively "keeping it local."

The return of a perennial water flow near the heart of the city

creates an opportunity to reconnect with our cultural heritage, improve the environment, and safeguard a sustainable water future for us all. It's amazing what can happen when you just add water!

You can learn more about the Santa Cruz River Heritage Project at tucsonaz.gov/water/SCRHP.



Kaven Potter PMB19 10390 S. Sierrita MtnRd Tucson AZ 85736-1442

PHOENIX AZ 852 29 MAY 2019 PM 5 L



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I-U Tier I EIS Study Team CO ADOT Communications 1655 W Jackson St Mail Drop 126F Phoenix AZ 85007

85007-327999

Please consider the proposed alternative below.

It appears that the I-11 construction has already began in Reno to Las Vegas Nevada. The next step is to continue to Wickenburg Arizona following Hwy 60. Once to Wickenburg Arizona, one of the proposed routes is to cut across to Gila Bend Arizona to I-8/Hwy 85.

We propose continuing the construction using Hwy 85 to Ajo-Why-Sells-Three Points/Robles Jct. From Three Points Arizona they can use Sasabe Hwy 286 that goes directly into Mexico. This route also takes you into a less vacation traveled access, fewer cars, where a upgraded check station for trucks can be created.

You also have the option of picking up the proposed route from Hwy 85 through Green Valley, Arivaca, Amada to I-19 to Nogales check station.

The above alternative routes have very little impact to the environment that has not already been introduced.

Thank you, Richard and Ramona Powell 6301 S Kathie Ann Dr Tucson, Az 85735 <u>194rpowell@gmail.com</u> 520.237.9140

July 5, 2019

Comments on the proposed I-11 corridor:

- 1. I question whether an alternate route to I-10 and I-19 is necessary. I use I-10 and I-19 quite often and do not find an undo amount of truck and commercial traffic. I believe the best option is to do nothing.
- 2. An alternate route would be expensive and burdensome to taxpayers. The trucking industry would be the main beneficiary of an alternate route.
- 3. It would be considerably disruptive to the land, the people and wildlife along the corridor. Even if wildlife bridges were included in the design it would still provide a rear barrier to the movement of wildlife.
- 4. Please consider not doing anything. If you must do something use the present I-10 and I-19 interstate corridors.

Thank you,

Thomas Prairie

1489 West Canyon Shadows Lane

Tucson, AZ 85737

520.235.5826

tlprairie@comcast.net

July 3, 2019

FROM: Mary V. Price, PhD and Nickolas M. Waser, PhD 1525 E Entrada Segunda Tucson, AZ 85718

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

RE: DRAFT TIER 1 EIS from Nogales to Wickenberg

We are residents of Tucson and scientists who have studied the ecology of North American deserts, including the Sonoran Desert, for over 45 years. We sent you a scoping letter on May 23, 2017 asking that the draft EIS address several serious concerns about probable detrimental impacts of proposed Alternative routes through the Avra Valley. We asked you to address:

- 1) Impacts to Tucson's Eco- and Cultural Tourism industries.
- 2) Impacts to the Sonoran Desert Ecosystem and Sensitive and Endangered Species.
- 3) The potential to solve multiple existing transportation challenges by choosing Alternative Route B, which builds on the existing I-19 and I-10 infrastructure.

We have read the draft EIS and preliminary 4(f) evaluation, and are deeply disappointed by the lack of detail in your analyses. Although you have acknowledged some issues related to our concerns 1 and 2, you have done virtually nothing regarding our request #3--in fact, you have chosen a preferred alternative that, even with your very superficial cost analysis, is far more expensive than Alternative B. Here we reiterate our concerns and ask that you conduct further detailed analysis for each alternative of likely impacts, their costs, and the costs of effectively mitigating those detrimental impacts. We ask furthermore that you include in your analysis lost opportunity costs of not starting to modernize our transportation infrastructure at this time.

We specifically ask that you:

- include in your analyses the costs of truly mitigating the detrimental environmental effects of the Avra Valley route.
- 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 Tucson proper, increased

costs of fire management from spread of invasive plants, and environmental degradation.

- include in your cost-benefit analyses the "lost opportunity" costs of failing to plan for modern multi-modal transportation links between Nogales, Tucson, and Phoenix that take advantage of existing rail corridors.
- include in your cost-benefit analyses the "lost opportunity" costs of not taking this opportunity to improve 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.
- identify alternatives other than the Avra Valley bypass to provide for redundant emergency and defense routes and include them in your cost analyses.
- 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, 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.

Thank you for your attention.

Respectfully submitted,

Mary V Price

Mary V. Price

Nimorasm. wase

Nickolas M. Waser

Attachment: i-11 Supercorridor Study



i-11 SUPERCORRIDOR STUDY

IUDS14 | Interdisciplinary Urban Design Studio Spring 2014 | Master of Science in Planning

UNIVERSITY OF ARIZONA I COLLEGE OF ARCHITECTURE, PLANNING, AND LANDSCAPE ARCHITECTURE

ACKNOWLEDGMENTS

Price, M I-2398

THANK YOU TO OUR SPONSORS









COLLEGE OF ARCHITECTURE, PLANNING & LANDSCAPE ARCHITECTURE

AND PARTNERS



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INTRODUCTION

REGIONAL CONTEXT FOR THE I-11 SUPERCORRIDOR

PIMA County

8	Why I-11?	14	Ports	29	Alignment Alternatives
10	Seven Sites through the	18	Freight Movement	29	Regional
	Southern Arizona Section	22	Passenger Rail	33	Visioning
					Population Projections

4

I-11 IN Southern Arizona

CONCLUSION

66 Summary of findings

APPENDIX

- 70 Rationale & evidence for 1,800 vphpl
- 71 Rationale & evidence for LOS C/D
- 72 Rationale & evidence for peak travel at 8% of AADT per hour
- 73 Figures
- 74 Tables
- 75 References
- 79 Other Resources

38 Environmental Impacts of the Avra Valley Alignment

- 48 Traffic Impacts of the I-11 Supercorridor
- 56 Costs

Price, M I-2398

INTRODUCTION

This document contains research completed by Master's of Planning Students from the University of Arizona, College of Architecture, Planning, and Landscape Architecture as part of their requirements for the spring 2014 Interdisciplinary Urban Design Studio. In addition to gathering information on the broader context of the route, this research focuses on analyzing the two proposed route options through the Southern Arizona section of the proposed I-11 corridor, one aligned with the existing Interstate 10 and the other a new alternative that would be built through Avra Valley. The breadth of research is not exhaustive, but attempts to challenge assumptions previously put forth concerning the I-11 through Pima County. The assumptions are made in an academic setting; any conclusions expressed herein are the sole conclusions of the students' research. Clearly, more research is necessary to make full conclusions concerning the placement of the I-11 Corridor through Pima County and the need for expanded transportation infrastructure.

As students of the UA, we serve not only as team members of the I-11 Supercorridor studio but as concerned stakeholders that reside in Southern Arizona. Research and passion from the local scale offer an intimate look into the existing conditions and expected outcomes of potential sites throughout Southern Arizona. Objective research and empirical data are necessary to strengthen any argument, but local perspective and personal experiences provide the I-11 and its stakeholders with exclusive ideas that are generated at the epicenter of the corridor.

This work was made possible in part by the generous support of the University of Arizona's Renewable Energy Network and Arizona State University's Walton Sustainable Solutions Initiative. Special thanks to Ardeth Barnhart of REN and Patricia Reiter and Ann Kinzig of GIOS/Walton. Thank you also to Mike Kies at ADOT and Ian Dowdy at the Sonoran Institute for their ongoing participation.

Why I-11?

Currently under study in a two-year joint effort between ADOT and NDOT, Interstate 11 is the latest national network link intended to support expansions in trade and goods distribution resulting in regional economic growth and greater north-south connectivity. As a "missing link" in the national interstate system – Phoenix and Las Vegas were too small to warrant connection in the original 1950s plan – I-11 proposes a unique opportunity to reconsider a broad range of transportation, manufacturing, and utility concerns in a world where environment, development patterns, water use, and energy production are of far more concern than they were a half century ago.

Part of the larger I-11 proposal linking Mexico and Canada (known as the CANAMEX or the Intermountain West Corridor), this roadway is already being conceived as a non-traditional transportation corridor with the potential to incorporate multimodal transportation, energy distribution, and telecommunication infrastructure in addition to car and truck traffic. The intent of this larger research based studio was to explore ways we could help forward that greater vision. In collaboration with partner schools along the route (UNLV and ASU), UA students from architecture, planning, and landscape architecture explored the possibilities of transforming the proposed I-11 freeway from a limited use transportation-dominant roadway into a sustainable, multi-functional, ecologically and socioeconomically focused Supercorridor. The report that follows is one part of the initial research.

The opportunity to impact the planning, design, and implementation of I-11 towards a more integrated, sustainable, smart, adaptable and productive piece of public infrastructure is an exceptional opportunity. On a local level, this interstate will impact the lives, economies, and environment of millions of residents and thousands of square miles. Critical concerns of climate change, water conservation and access, social equity for tribal nations and other residents, and the preservation of our prized natural landscape are at risk if the process proceeds unchecked; the opportunity is there. This project offers a chance to engage with a vast range of stakeholders and political processes in an effort to impact and enlighten a real-world problem. We believe this work will have local, regional, and global implications for shifting the infrastructure paradigm.¹

More work from the I-11 Supercorridor Studio can be found on the website at: http://i11supercorridor.weebly.com

Seven Sites through the Southern Arizona Section

Seven sites along the Southern Arizona section of the proposed I-11 were selected to attempt to address the following questions. These sites are: Casa Grande, Marana, North Tucson (6th St. and I-10 intersection), Downtown Tucson (Congress and I-10 intersection), Avra Valley, Sahuarita, and Nogales. Responses to the questions below vary depending on research.

The initial questions included:

Where should traffic be directed, through the major urban areas or through the rural Avra Valley?
What impacts should we expect from each alignment?
How will development patterns and population growth be altered?
Does the evidence support the need for the I-11 freeway?
What are the trade possibilities with Mexico and Canada?
What new infrastructure will be required for the I-11 Corridor?
What will be the cost of each potential alignment?
Can new technologies or policies change the way the I-11 Corridor will be used?

The I-11 Supercorridor Study investigates how the proposed I-11 can best fit into the community's vision by answering the questions listed above. It includes an analysis of population projections, ports and freight movement, current traffic patterns and projections, traffic demand management, environmental impacts, and the costs of land acquisition and freeway construction.

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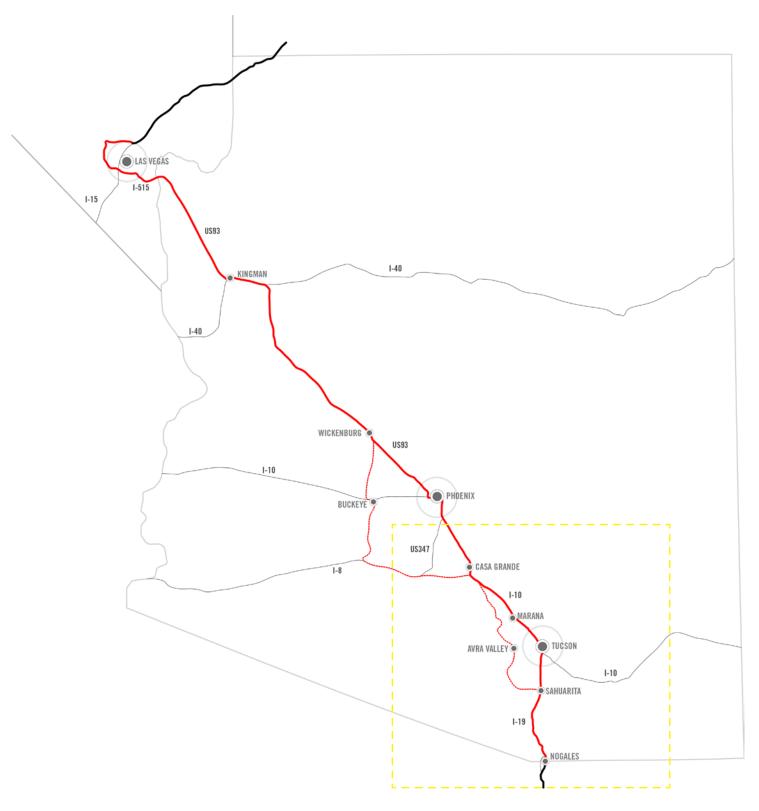


Figure 1-2-1. Six cities and seven focus sites (two in Tucson) along the Southern Arizona section of the proposed I-11 route.



Figure 1-2-2. Infrastructure Context

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2

Regional Context for the I-11 Corridor

PORTS

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One of the most commonly cited justifications for construction of the Southern Arizona segment of the I-11 Freeway is the expansion of Puerto de Guaymas in Guaymas, Sonora, Mexico (Figure 2-1-3). According to the World Shipping Council, nine of the top ten busiest container ports in the world are located in South Korea, China and Singapore.³ The largest port in the United States receiving goods from these ports is in Long Beach, California. "The Port averages over 100 train trips per day. Intermodal yards are reaching capacity, resulting in time delays moving cargo between trains and trucks."⁴A new port must be identified to handle any additional volume of imports from Asia. Several locations have been considered as candidate sites, including both Guaymas and Prince Rupert, British Columbia, Canada. A summary of costs and benefits associated with both of these locations follows.

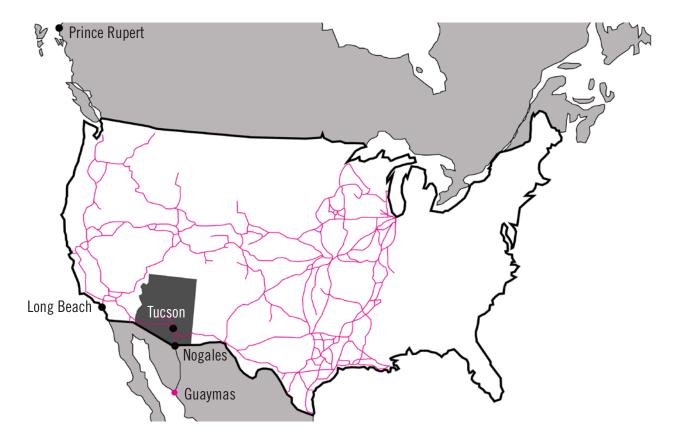


Figure 2-1-3. Connectivity to Guaymas Port, Mexico 5

Port of Guaymas, Sonora, Mexico

The Guaymas Port currently handles vessels as large as 130,000 tons⁶, and receives freight from Asia, the Middle East, Africa, Europe, and South America. Between 2010 and 2011, total cargo volume processed at Guaymas grew 22%, faster than any other port in Mexico (Figure 2-1-4).⁷ The port in Guaymas is 256 miles by road to the Port of Nogales at the US-Mexico border. The trip takes five hours by road; slightly less by rail.

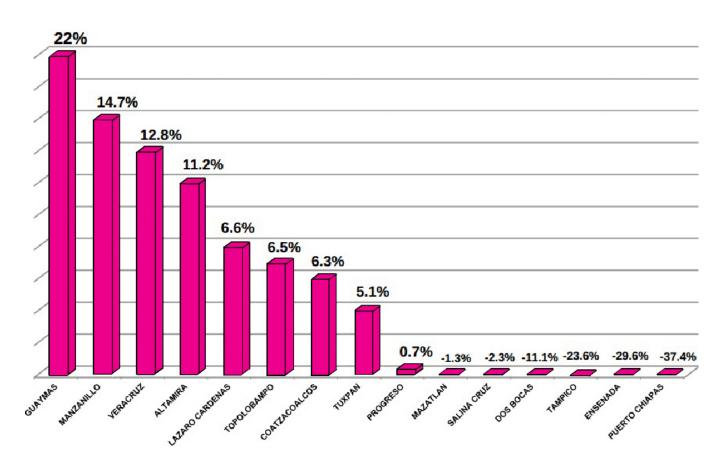


Figure 2-1-4. Growth of Total Cargo Volume in the Mexican National Port System, 2010-2011 ⁷

Bulk and Container Ports

There are two types of seaports that handle cargo: bulk ports and container ports. Each type requires a specialized set of infrastructure for the exchange of cargo between shipping vessels and land based forms of travel. At container ports, cargo is carried on large ships using sealed cargo containers. Containers are likely to hold more finished products, ready for market. Generally they have a high value to weight ratio, and are higher priority for delivery to market over bulk cargo. Cargo containers can be moved from ship to ship, ship to truck, and ship to rail. "Container ports require more space than bulk ports, and an inland container terminal where cargo can wait to be moved to the next vessel is also necessary. At bulk ports, cargo is transported unpackaged, in large quantities. Cargo entering or exiting these ports can be in several different forms: liquid, granular, small or large solids. Examples of cargo for a bulk port are petroleum, grain, coal or gravel".⁷ These ports typically require a strong connection to railroad infrastructure so cargo can be poured into waiting rail cars for transport. Bulk goods are often loaded onto rail because of their lower value to weight ratio. A rail car can hold as much as four semi-trailer trucks and is much more efficient in fuel use.

The design and implementation of the I-11 Corridor will depend on the type of port developed at Guaymas, and the quantity of goods received there. Guaymas port will likely serve primarily as a bulk port, rather than a container port. Support for this prediction can be found in a master plan for the Port of Guaymas released by the Mexican Secretaría de Comunicaciones y Transportes in 2012.⁷ The plan lists many of the projects that have expanded the port between 2007 and 2011. The Mexican government has contributed millions of dollars to the expansion of this port, which includes the development of docks, navigational areas, railway infrastructure and the preparation of the surrounding land to expand the port. Current business interests in Guaymas include the import and export of bulk grains, bulk minerals, fuels, fluids and general cargo.⁹ Containers are eighth on a list of nine current operations of the port. The master plan includes seven steps for expanding the port by 2016: steel terminal (bulk), mineral terminal (bulk), fertilizer terminal (bulk), fluids terminal (bulk), bulk terminal (bulk), leisure cruise terminal, and vehicles yard. The greatest capabilities of the port are focused on bulk import/exports. Railroad infrastructure serving the port is anticipated to expand, another characteristic of a bulk port. Two railroad routes serve the Guaymas Port, one north to the US and the other south into Mexico. Recent cargo deals for the port are also for bulk goods: iron ore and coal. The port is expected to implement container service with a capacity of 1,300 containers. "The Mexican government will fund the expansion, but future terminals for minerals, oil, coal and grains will be leased to private companies."⁹ A portion of the port's expansion will be for container traffic, but the majority will serve bulk good. Asia is likely to look for a different gateway for containers into lucrative American markets, enter Port Prince Rupert.

Port of Prince Rupert, British Columbia, Canada

The Port of Prince Rupert is geographically well positioned due to its connectivity to North American and Asian ports. It is considered "the shortest trade route between the world's most dynamic economies."¹¹ Canada is beneficiating itself in their growth economy. Prince Rupert is one of the deepest ice-free ports in the world with almost 1000 acres of land available for expansion.

Mexican and Canadian Tariffs and Wages

A tariff is a tax levied on imports by the accepting government to offset the effect of a particular import on the local market where that good may already be manufactured. Tariffs are imposed on goods when first entering a port. Goods entering Mexico are taxed at an average of 13.97%, but can be taxed as high as 140.4%. Certain items, such as laptops and other electronics, are exempt from government tariffs.¹² In Canada, tariffs range as high as 35%; with an average of 8.56%. Canada also lists certain exempt items: electronics, antiques and toys.¹² Shipping companies use these rates to calculate the most viable port for their cargo.

An inexpensive labor force in Mexico is often cited as an additional reason to believe the Port in Guaymas will continue to grow. This idea comes from a potential global market shift called near-shoring. This involves companies moving assembling processes closer to major destination markets such as the US. Certainly, labor costs are lower in Mexico than Canada, however, the Asian Pacific region has a strong manufacturing market due to its own low-priced labor force. This translates into massive quantities of textiles, electronics, automotive products, heavy equipment, and oil imports to the Americas.¹³ Many of these items are not exempt from tariffs in either country. Of the previously listed items, only oil can be brought into a bulk port.

These factors make Canada's Prince Rupert Port a more likely destination for Asian imports to North America. Guaymas Port is more apt to remain a small bulk port. This appraisal of West Coast ports should temper the expected capacity needs of the I-11 Corridor.

FREIGHT MOVEMENT

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The Arizona Sun Corridor has been identified as an emerging megaregion in the United States as shown in Figure 2-2-5.¹³ This megaregion stretches across central and southern Arizona from Phoenix to Tucson and ultimately to the US-Mexico border at Nogales. The Arizona Sun Corridor will be the result of the merging of several urban areas into one single metropolitan area with shared resources and transportation facilities, and a single economic system. Freight movement

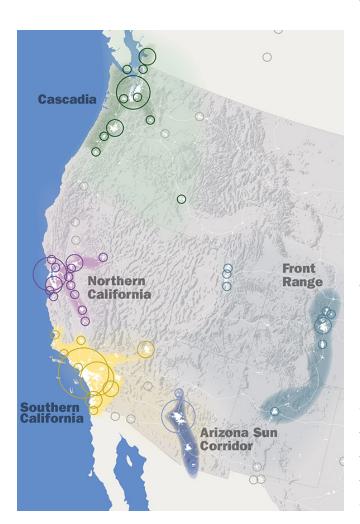


Figure 2-2-5. US Megaregions¹⁴

through the region may be affected. As the Sun Corridor grows it will increasingly become a destination market for a larger portion of goods distributed nationally. Additionally, if the economy of the region continues to diversify into manufacturing and assembly it may become a more critical origin and destination of freight. Both of these are important aspects of the Sun Corridor's future. Freight that passes through the region to reach other origin-destination markets without stopping adds little economic benefits, while increasing the burden of the region's infrastructure and environment.

The corridor's population encompasses approximately 85% of the people in Arizona, and projections estimate its population will reach approximately 12 million people by 2050.¹³ This situation could place Arizona's infrastructure under stress, lengthening travel time for residents and freight. According to a 2013 survey, freight shippers use three categories of criteria to decide upon where to locate their facilities. The first criteria is geographic proximity to local and regional markets, and distribution facilities, followed by the capacity of local ports. The final criteria theme involves the availability of rail and truck drivers to

move cargo into or out of the port in a quick and reliable manner.¹⁵ The third criteria related to concern over lengthened travel times due to increasing congestion as the population grows. Freight shippers are unlikely to locate in areas with poor travel conditions, now or in the future.

In order to justify the development of the I-11 Corridor, additional analysis of freight movement, especially at the US-Mexico border, is necessary. The following section reviews market trends in freight movement between the US and Mexico. In particular, it looks at the relative strengths, weaknesses, opportunities and threats, which may have an effect on freight movement across the border as a whole and in particular to the border crossings in Arizona. Key findings include the vast majority, eighty percent, of the tonnage transiting between Mexico and the United States passes through Texas.¹⁵ Arizona is unable to capitalize on receiving this freight due to underdeveloped infrastructure, geographic location and population size.

Freight Port Entry U.S. -Mexico

According to the United States Department of Transportation, the top 5 points of entry for road-based freight from Mexico into the United States in 2004 were Laredo, TX with 1,391,000 annual crossings, Otay Mesa, CA with 725,000 crossings; El Paso, TX with 720,000 crossings; Hidalgo TX with 454,000 crossings; and Calexico, CA with 312,000 crossings (Figure 2-2-4).¹⁷

For rail freight, Laredo, TX sees 3,400 crossings each year, Eagle Pass, TX, 1650 crossings; Brownsville, TX, 1000 crossings; El Paso, TX, 750 crossings; and Nogales, AZ, 450 crossings. Seven of the ten busiest points of entry are located in Texas. California and Arizona share the remaining three.

Delays have been a major concern at Nogales for freight headed north into the US. Recently the Department of Homeland Security's US Customs and Border began operating a new port of entry facility at Mariposa on the western edge of Nogales. This \$184 million dollar project was funded through the new Recovery and Reinvestment Act (RRA). The upgrades included facility expansion including the number of lanes and modernization.¹⁸ It is still too early to tell what impact the expansion will have on the crossing times for freight, but they are expected to dramatically decline. The scale of the expansion is also demonstrated by the U.S. Customs and Border agency hiring an additional 120 agents for the two ports in Nogales.¹⁹ Ports at Laredo and El Paso, Texas are attractive due to the low price of land, which motivated companies and distribution centers to move to these areas.¹⁶ The State of Arizona might consider methods that affectively reduce the price of land in Nogales. This may motivate companies to move into the area, providing jobs, and refreshing the economy in the area. Such methods may include tax deferment, construction fee waivers or infrastructure upgrades.

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Top 5 U.S Mexico Road Ports 2004						
	No.	Border	No. of crossing	%		
F	1	Laredo, TX	1,391,850	39		
А	2	Otay Mesa, CA	726,164	20		
D	3	El Paso, TX	719,545	20		
Η	4	Hidalgo, TX	454,351	12		
В	5	Calexico, CA	312,227	9		

Table 2-2-1. Top 5 U.S. - Mexico Road Ports, 2004

Top 5 U.S Mexico Rail Ports 2004						
No.	Border	No. of crossing	%			
1	Laredo, TX	3,443	47			
2	Eagle Pass, TX	1,653	23			
3	Brownsville, TX	998	14			
4	El Paso, TX	744	10			
5	Nogales, AZ	444	6			
	No. 1 2 3 4	No.Border1Laredo, TX2Eagle Pass, TX3Brownsville, TX4El Paso, TX	No.BorderNo. of crossing1Laredo, TX3,4432Eagle Pass, TX1,6533Brownsville, TX9984El Paso, TX744			

Table 2-2-2. Top 5 U.S. - Mexico Rail Ports, 2004

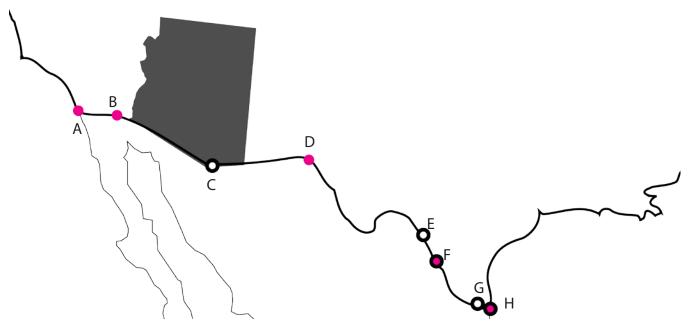


Figure 2-2-6. Location of points of entry for road and rail freight at the US-Mexico border

Freight movement through the State of Arizona

Statewide, freight is categorized as inbound, outbound and through, depending on its origin and destination. Freight with both an origin and destination outside of Arizona (through traffic) is the largest category in both weight and value; approximately 217 million tons or 56% of all freight by weight. The amount of freight passing through the state by value is even more striking. Approximately \$605 billion in shipments, or 77%, pass though on their way to other destination markets. This single category exceeds the combined quantity of outbound, inbound, and internal goods. This is likely due to East-West flow of freight through the state on I-10. Inbound movements are greater than outbound movements in Arizona. Arizona consumes more goods than it produces.

Trucks are the predominant travel mode for freight movement in Arizona. Over 82% of freight with an origin or destination in Arizona is moved by truck (137 million tons). More than 70% of through traffic trips are made by truck (152 million tons). Truck volumes on I-10 are expected to grow at a rate of approximately 3% each year, roughly doubling by 2025.¹⁹ Vehicle volumes will grow at a somewhat slower rate, around 2.4% each year. Growth in freight truck traffic will depend on a number of external factors including fuel prices, port demand and capacity.

Pima County is second (behind Maricopa County) in origin and destination for freight traffic in Arizona with over 34 million tons of domestic freight originating and/or terminating in the County. The majority of these movements are by truck (32 million tons). Flows with an origin and destination in Pima County are likely to continue using the existing transportation network. Although in some cases new roads may provide more direct routes for the movements of these goods, most of the economic activity and consumption of goods occurs in areas that are best accessed by I-10.²⁰

Direction	Millions of Tons	? Percent of Total	Millions of Dollars	Percent of Total	
Outbound	28.9	8% 44,284		6%	
Inbound	52.8	14%	68,641	9%	
Internal	85.8	22%	68,912	9%	
Through	217.3	56%	605,486	77%	
Total	384.8	100%	787,323	100	

Table 2-2-3. Freight movements in Arizona, 2008 $^{\rm 21}$

In Pima County, through traffic of commercial trips account for approximately 25-45% of all commercial trips. Inbound commercial trips are slightly higher than outbound commercial trips (Table 2-2-4). This further supports the idea that the region in a net consumer rather than a net producer. The volumes on 1-10 are much larger than those on 1-19 yet the proportion of commercial traffic is very similar between the two freeways.

Commercial Trips in Pima County									
	Overall		I-10 Red Rock I-10 B		I-10 Be	nson	I-1	I-19	
	Vehicles		Vehicles	%	Vehicles	%	Vehicles	%	
Through	3,325	25.0%	2,986	38.9%	2,711	45.1%	701	36.8%	
Inbound	5,238	39.3%	2,489	32.5%	1,538	25.6%	604	31.7%	
Outbound	4,748	35.7%	2,194	28.6%	1,765	29.3%	599	31.5%	
Total	4,748	100%	7,669	100%	6,014	100%	1,904	100%	

Table 2-2-4. Commercial trips in Pima County on a "typical day", 2014 ²¹

PASSENGER RAIL

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Existing rail infrastructure

Passenger rail can help address many of the problems facing the American transportation system addressed above. The benefits of passenger rail include ²²:

- Reductions in road and airport congestion
- Lessen the impact rising price of gasoline on residents
- Moderate emissions of greenhouse gasses
- Mitigate the lack of public funding for highway construction and maintenance

The Brookings Institute published a study in 2009, which analyzed the potential for high speed rail in the United States. The report concluded California, Nevada, and Arizona have the highest potential because of environmental factors, potential ridership numbers, and total cost.²³ There are currently no dedicated passenger rail lines between Nogales and Tucson, Tucson and Phoenix, nor Phoenix and Las Vegas. Figure 2-3-7 shows existing rails in Arizona and Nevada. Currently, dedicated passenger rail lines in Arizona are located between Phoenix and the Grand Canyon, and Kingman and Las Vegas. In addition to these two dedicated passenger rail lines, Amtrak offers limited service on freight lines through shared use agreements with freight rail companies.

Three Amtrak routes serve Arizona and Nevada ²⁴:

- 1. California Zephyr (Chicago-Denver-Glenwood Springs-Emeryville), including Reno, Sparks, Winnemucca, and Elko
- 2. Southwest Chief (Chicago-Albuquerque-Los Angeles), including Kingman, Williams Junction, Flagstaff, and Winslow
- 3. Texas Eagle/Sunset Limited (Chicago-St.Louis-Dallas-San Antonio-Los Angeles) / New Orleans-San Antonio-Los Angeles, including Benson, Tucson, Maricopa, and Yuma

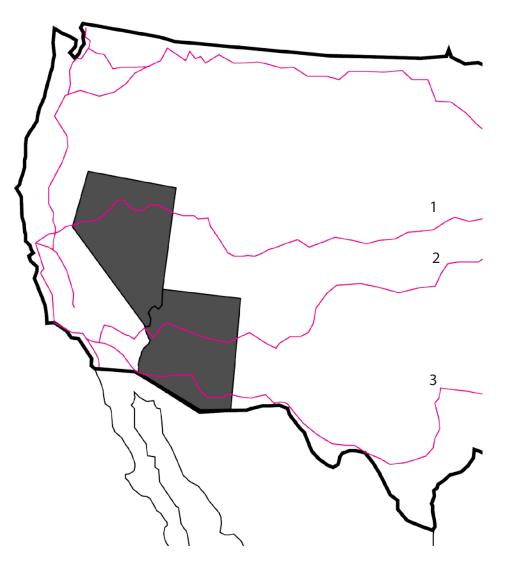


Figure 2-3-7. Existing rail lines in Arizona and Nevada²⁵

Phoenix – Tucson High-speed Rail

In 2013, the Arizona Department of Transportation published a study investigating the potential for passenger rail connecting Phoenix and Tucson.²⁶ This rail line would become a key link in the Sun Corridor megaregion discussed above. Three promising rail corridors were identified (Figure 2-3-9). The orange alternative will service 1,397,541 people, who live within 3 miles of the 11 proposed stations, increasing to 2,209,287 people by 2035. The yellow alternative has 11 stations, with a nearby population of 1,528,563 people, increasing to 2,419,168 by 2035. The green alternative follows a route very similar to the proposed I-11 Corridor. The route has 6 stations, which would service 1,216,015 people who live within 3 miles. By 2035, that population is expected to increase to 1,907,917 people. Construction of this alignments would have substantial impact on sensitive historic and cultural resources, and may require the acquisition of reservation land from the sovereign Gila River Indian Community.

The southern portion of the proposed I-11 Corridor connects Arizona's two largest metropolitan areas. Arizona's population is predicted to grow from 6.4 million to 11.6 million by 2050.²⁷ Most of this growth will occur in urban areas, which will increase the demand for transportation options between Tucson and Phoenix. The necessity for passenger rail is based on the anticipated travel patterns and growing congestion on the highway network, which is a result of population and job growth projections. Passenger rail (either commuter rail or high speed rail) is one way to reduce car dependency, thus reducing anticipated congestion.

Currently, there are no passenger rail lines connecting Nogales and Tucson. The I-11 Corridor presents an opportunity to create this connection, and to extend the line internationally with possible passenger rail service between the US and Mexico. Nogales is Arizona's principal port for freight crossing by rail. The customs process at Nogales is very slow, and trains waiting to cross the international border or to clear customs inspections block traffic in the city. There are efforts underway to move the rail either east or west of the existing location. Union Pacific Railroad owns the rail lines through Nogales. If freight rail service is moved out of downtown Nogales, the existing line would be abandoned. The infrastructure could be repurposed for use as a passenger rail. This would reduce overall construction costs, and facilitate the creation of a much needed passenger rail connection between Nogales and Tucson.²⁷

Phoenix – LA – Las Vegas High-Speed Rail

Another possible solution for promoting passenger rail travel between Phoenix and Las Vegas is proposed in the Regional Plan Association's California and the Southwest report for high speed rail. The alternative would connect Los Angeles, Phoenix, San Francisco, San Jose, San Diego, and Las Vegas. This infrastructure would allow Arizona passengers to travel by rail to California, and then from California to Las Vegas.

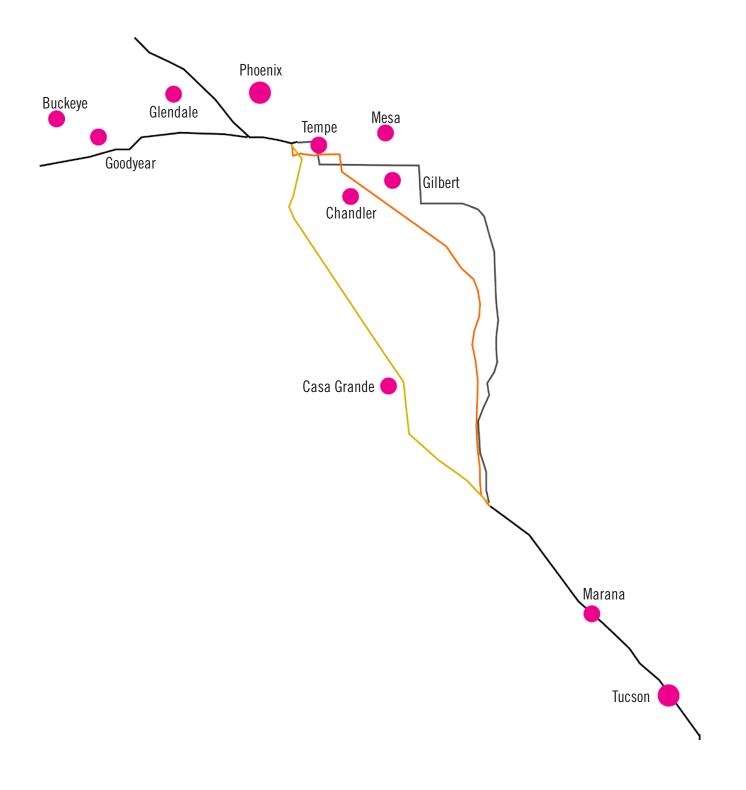
Incorporating new passenger rail routes between Phoenix and Las Vegas as a part of the I-11 Corridor would improve north-south connectivity between Arizona, Nevada, and California. Rail passenger benefits include:

- Improving businesses in Arizona and attracting investments to create value that will ripple through the economies of the two states, creating jobs and boosting economic growth; and
- Transporting people in a greener, more efficient manner.

Connecting the major economic activity centers of Phoenix and Las Vegas with a reliable ground transportation network will make the entire region more competitive. Research from ADOT shows new capacity may be needed to accommodate expected growth in the region because the routes currently connecting it will continue to be congested.²⁸



Figure 2-3-8. Proposed California High Speed Rail System



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3

PIMA COUNTY

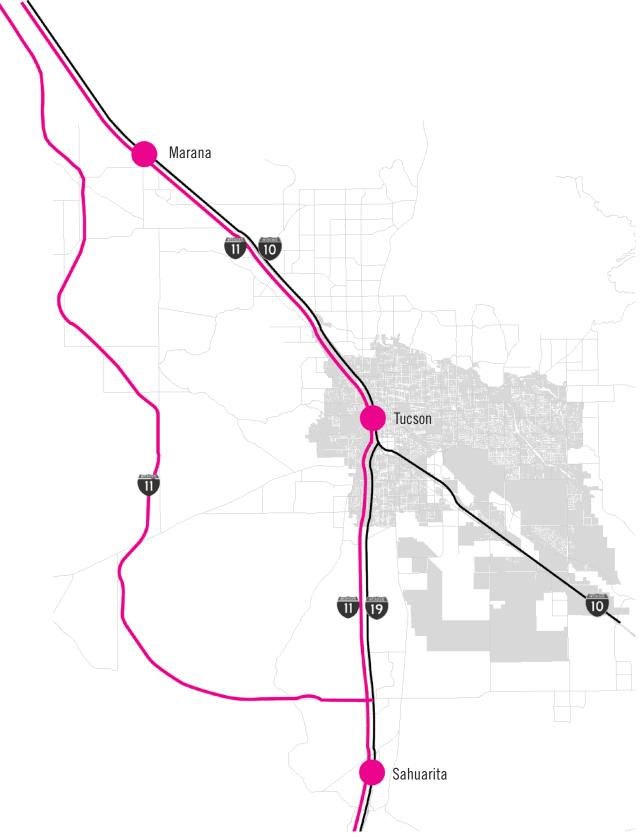


Figure 3-1-10. I-11 alternative alignments through Southern Arizona

3.1

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Two options for the I-11 Corridor alignment through Southern Arizona have been proposed (Figure 3-3-8). The first, the I-10 Alignment, would expand infrastructure on the I-10 and I-19 highways through the City of Tucson. The second, the Avra Valley Alignment, would bypass the city, and run through Avra Valley, west of Tucson. Aligning the I-11 through Tucson has initiated debate about traffic congestion in downtown Tucson. This document looks at current and projected traffic numbers through downtown Tucson to determine if an expansion of I-10 is needed in this area. The Avra Valley Alignment is a concern to stakeholders due to environmental impacts, environmental justice, urban sprawl, state land, private property, and development impacts. This portion of the document assess the two alignment options.

REGIONAL VISIONING

From 2010 to 2012, the community of Tucson was involved in a regional visioning process led by an organization named Imagine Greater Tucson (IGT).³⁰ The process included asking participants what they valued about their community and how they wanted to see it grow. The results from this multi-year effort are examined in this document as a sample of the community's vision. More than 10,000 of the 980,263 residents in the Tucson metropolitan area contributed to the IGT process through surveys and group mapping sessions. Four alternative patterns for future development were proposed: urban centers (more dense development in clusters around the region), centers and suburbs (some dense and some less dense developments), new centers (new cities developed where none exist today), and a continuation of the current trend.

The public chose urban centers over other development patterns.

The survey results give insight into general attitudes about infrastructure and transportation. Shorter travel time was given lower importance than items such as clean and sustainable water resources, and easy access to public transportation. One half of survey respondents believe that creating a regional rail system takes priority for future funding. Building new roads is priority for only 28% of respondents, the smallest response rate. Commuter rail is considered as important as freight rail. The input received throughout the IGT process was used to develop a series of scenarios representing growth and development patterns that might shape the region in the future. "The Preferred Future Scenario depicts a region that is more compact, efficient, walkable, bikeable, greener, and transit-oriented than it would be if we were to continue with a business-as-usual approach to growth".³⁰ This preferred scenario "consumes about one third the amount of land" as the current trend scenario.³⁰ When selecting the alignment of the I-11 Corridor through Southern Arizona, this desired future of the local community should be kept in mind. Although a potential freeway bypass through Avra Valley was not considered as part of the IGT process, the preferred vision would reduce greenfield development, could increase density in key areas and maintain natural areas. An Avra Valley alignment runs contrary to these three desires.

The City of Tucson's General & Sustainability Plan, or Plan Tucson, closely follows the vision of the Imagine Greater Tucson Preferred Scenario. Figure 3-2-10 illustrates where the City of Tucson plans for growth to occur. Key characteristics include focused development at higher density, infill, and neighborhood centers.

The new freeway will increase the desirability of the Avra Valley as a location for bedroom communities and commercial uses. Expanded transportation infrastructure will decrease commute times to centers of employment such as Tucson and Marana. When demand for land increases, the State Land Department is more likely to sell land to developers, increasing the land available for typical suburban sprawl, and further fragmenting the landscape.

Imagine Greater Tucson and the Tucson General Plan do not account for the proposed I-11 supercorridor. The proposed I-11 Avra Valley Alignment makes suburban sprawl inevitable due to standard freeway development, and would subvert the public's vision to grow more densely.

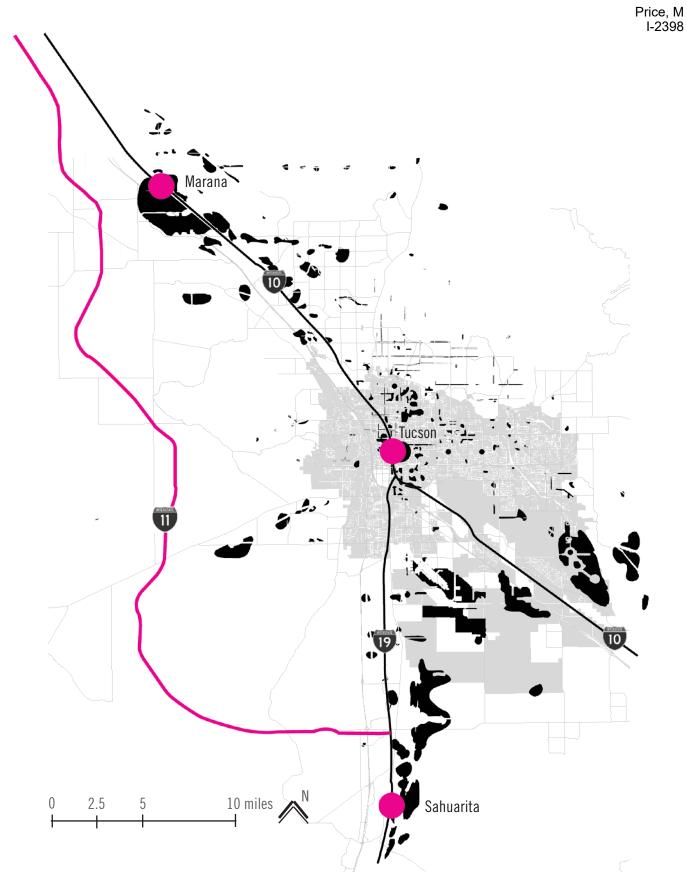


Figure 3-2-11. Imagine Greater Tucson expected growth, 2013 $^{\scriptscriptstyle 30}$

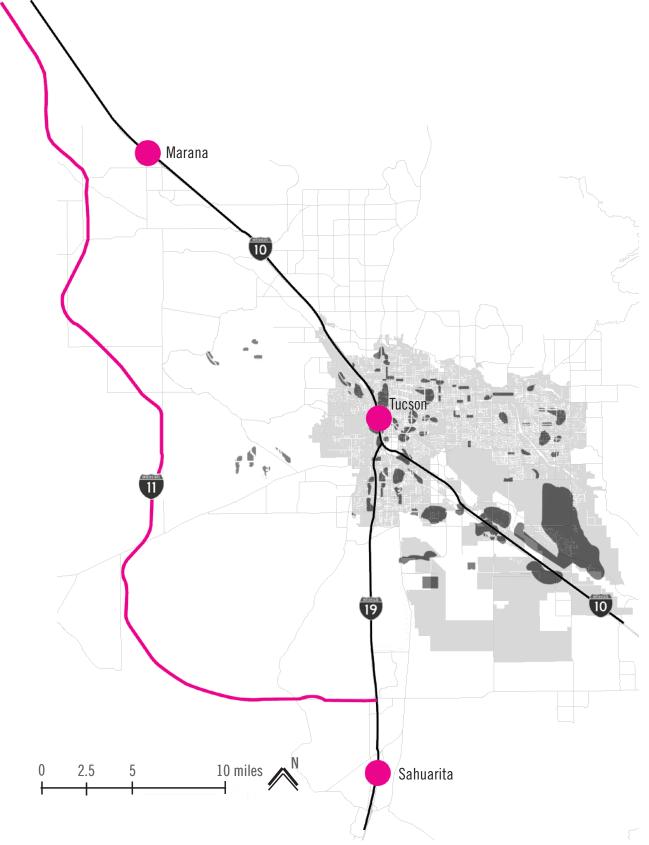


Figure 3-2-12. Tucson General Plan expected growth, 2013 ³¹

POPULATION PROJECTIONS

Population projections are generally calculated using a variety of factors, which depict growth patterns for a region. The Arizona Department of Administration makes population projections for the entire state by county. ³³ In Pima County, the Pima Association of Governments (PAG) calculates sub-county population projections using the Arizona Department of Administration projections for Pima County modified with US Census tract data, historic growth rates, proposed development plans, long term planning documents, new infrastructure, employment growth, and numerous other factors that cause general population changes.³⁴ PAG projects population for incorporated places, census designated places, and for the remainder of the county.

However, these existing models do not account for the construction of the I-11 corridor through Pima County, which would alter growth along its path. In order to understand how the construction of a new highway through Pima County would impact its growth pattern, a model was built to extrapolate the population projections made by PAG for areas impacted by the I-11 route alternatives. As a baseline, Figure 3-3-13 reports the population projections for a no build scenario, which are identical to the Arizona Department of Administration's most current population projections.³³

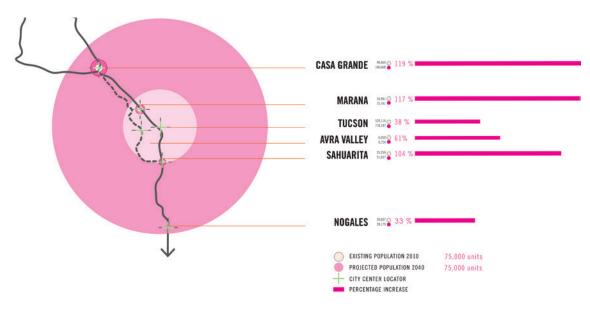


Figure 3-3-13. 2010 - 2040 Population Growth Rate for Southern Arizona

Model Development

The model developed for this report begins with the PAG reported 2010 population estimates for the following locations: Casa Grande, Avra Valley, Marana, Sahuarita, and Nogales. For Tucson, a greater degree of nuance was desired. The impact of the proposed I-11 will be the greatest in close proximity to the new highway. Analysis was limited to US Census Tracts within one mile of the proposed alignment through the city. Current population for 6th Street and I-10 intersection was further limited to the north area of 6th Street. Likewise, the reported population in Downtown Tucson is for the census tracks within 1 mile of the proposed route, south of 6th Street.

The change in population projections are determined by two major factors: (1) percentage of the total county population increase per site and (2) influence based on proximity to the new roadway alignment. The growth rates and projections for this model are based on the PAG reported expected growth rate of the county, which are then multiplied by a "growth factor" determined by research of highways and their impact on population growth. The growth factor used is based on a study that observed growth patterns of population and development over ten year periods from 1980 to 2000 and related them to proximity to highway expansions in the Midwest. ³⁴ To determine the coefficient of growth, three methods were used: linear Ordinary Least Squares (OLS), spatial error model, and spatial lag model. Resulting in the following growth factors: 1.8% (spatial lag) and 2.9% (spatial error model).

Modeled Population for I-10 Alignment

Expanding the I-10 roadway on the route that exists today would accelerate population growth. The construction of the roadway and increased traffic could draw development closer to the I-10. Increased accessibility and connectivity to the transportation network will likely entice new development.

If the I-11 corridor is built along the existing I-10, there would be a noticeable increase of population along the existing nodes that are bisected by the expanded roadway. Vehicle traffic traveling north from Mexico and west from New Mexico would travel through this location, which provide a basis for growth in the future. Noticeable increases in growth rates per year until 2040 are those directly affected by the expansion of the roadway and received a high-end growth factor of 2.9 percent: Casa Grande (4.2%), Marana (4.1%), 6th Street and I-10 intersection (1.0%), Downtown Tucson (1.0%), Sahuarita (3.7%) and Nogales (2.3%). The one design site that would not be greatly influenced by the expansion of I-10 would be the Avra Valley site, which only received a 1.8 percent growth factor because it will see an increase of population due to the expanded market in Pima County. With a limited growth factor, Avra Valley would see a growth rate up to 2040 of 2.1%.

Modeled Population for the Avra Valley Alignment

The alternative alignment for the I-11 corridor through Southern Arizona is the development of the Avra Valley bypass route. Similar to the I-10 expansion model, the projections and growth rates for this model are based on a factoring of growth determined by the alignment of the new infrastructure. A study by 'The Maryland Public Interest Research Group" found that metropolitan patterns are induced by highways. They called the "magnet effect" as well as the "ripple effect".³⁵ It refers to the phenomena of new development occurring along the construction of highways. The further the highway is from the urban core area, the more the intense the effect will occur.

Marana and Sahuarita would also see an increase in growth. These particular areas would be influenced greatly by the Avra Valley route because they would become the regions where vehicles would enter or exit the Avra Valley Alignment. Vehicles traveling along the new road would use the route to bypass Tucson, which would cause Marana and Sahaurita to see a larger growth rate than the two Tucson sites. In this particular model, the low end growth rates (1.8%) would be applied to the downtown Tucson sites because they are the locations along the new route that would be bypassed. The higher end growth factors (2.9%) would be applied to all other design sites that would expect to see a higher volume of traffic due to the newly constructed roadway.

The development of the Avra Valley Alignment provides an alternative to the I-10 roadway. The initial idea behind this route was to allow passenger and commercial traffic to move around the Tucson region without driving through the city limits. This roadway also increases the market in the region, but the population increase disbursement would vary from that of the expansion of I-10 model. The growth factors would change in the Avra Valley, whereas the two downtown Tucson sites would receive a low-end growth factor of 1.8 percent. The growth rates per year up to year 2040 for the selected sites in this model are: Casa Grande (4.2%), Avra Valley (2.1%), Marana (4.1%), 6th St. and I-10 intersection (1.0%), Downtown Tucson (1.0%), Sahuarita (3.7%) and Nogales (2.8%).

Discussion

The two alternatives for expansion of the I-11 corridor show increases in population in the seven locations. Although the population forecasts have similar results, the disbursement of the increased population varies depending on the I-11 Corridor alignment alternative selected. The I-10 Alignment collects the increase in population along the nodes and away from the Avra Valley region, allowing the area to remain rural. The Avra Valley Alignment causes large increases of population in the western section of the corridor, primarily in the Avra Valley, Marana and Sahuarita.

Price, M I-2398

I-11 IN Southern Arizona

ENVIRONMENTAL IMPACTS OF THE AVRA VALLEY ALIGNMENT

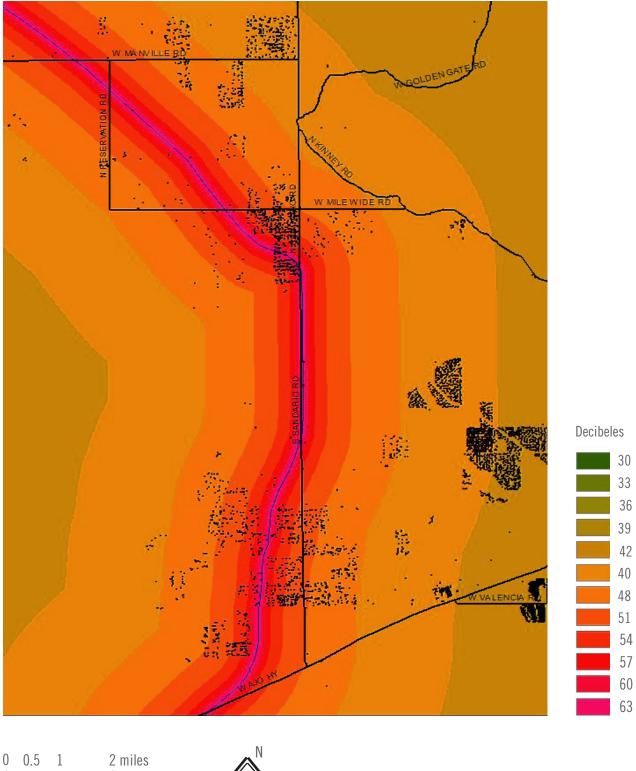
The City of Tucson is surrounded by mountain ranges that largely constrain its development. The Avra Valley is located to the west of the Tucson Mountains, which are located to the west of the City of Tucson. This relatively undeveloped valley has been proposed as a potential alignment for the I-11 Corridor through Pima County, but the environmental impacts for this path would be significant. Biological resources, conservation lands, cultural resources, and water resources are likely to suffer negative effects if the I-11 is placed in this rural valley.

The Arizona Department of Transportation estimates that heavy traffic produces 60dB of noise at 300 feet (2005).³⁷ At 600 feet, the listener would hear 57 dB of noise. Noise is measured with a logarithmic scale, so that the level of noise experienced is reduced by 3 decibels (dB) each time the distance from a noise source is doubled. Figure 4-1-14 shows Noise Impact in Avra Valley under the Proposed I-11. The entire Avra Valley would experience an increase in noise if the Avra Valley alignment is constructed. In general, rural areas are estimated to have nighttime noise of approximately 30 dB. The proposed I-11 Corridor would result in twice as much traffic noise (42dB) at the farthest extent of the map (each change of 10 dB is perceived as twice as much noise). Placing an interstate highway through this area will have a significant impact on the quiet of the Avra Valley, as well as in Saguaro National Park, the Tucson Mountain Park, and the Ironwood National Monument.

There are 32 acres of known archeological sites in the Avra Valley that will be impacted by the proposed I-11 Corridor.³¹ The locations of these sites are withheld from the public to prevent possible damage. The sites are from the Pleistocene, Archaic and Hohokum periods. Further analysis is not feasible without location data, but the impact of the proposed I-11 alignment through the Avra Valley on irreplaceable cultural artifacts is significant.

Pima County adopted the award winning Sonoran Desert Conservation Plan in 2001, which is now part of the county's comprehensive plan.³⁸ Since that time, voters have approved \$174.3 million in bonds to purchase and conserve over 180,000 acres of open space for habitat conservation.³⁹ The desert conservation plan is intended to connect communities of vulnerable plants and animals facing habitat fragmentation. At least 95% of Important Riparian Areas, 80% of Biological Core Management Areas and Special Species Management Areas, and 67% of Multiple Use Management Areas must be conserved. Any disturbance to these lands must be mitigated with land area multiplied by a mitigation

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ratio specific to the category of land. In addition, Critical Landscape Connections are identified as areas important for the movement of wildlife, but impeded to some degree by development. Any landscape changes in these areas must protect the existing wildlife linkages.⁴⁰

Avra Valley is a relatively undisturbed area that contains intact habitat for multiple species. Ninety-four percent of the proposed I-11 Corridor would impact the Conservation Land System, including Special Species Management Areas, Biological Core Management Areas, Important Riparian Areas, and Multiple Use Management Areas.³⁸ Five thousand acres of mitigation land would be needed in exchange for the more than 1,700 acres that will be impacted.³⁸ Two Critical Landscape Connections will also be bisected. In contrast, the route through the city of Tucson is almost entirely outside the conservation lands with the exception of the area along the current I-10 corridor to the South of

	I-2398
Conservation Land Type	Area (Acres)
Special Species Management Areas	347
Biological Core Management Areas	345
Important Riparian Areas	47
Multiple Use Management Areas	1,003
Total	1,742

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Table 4-1-5. Conservation Land System impacted by the Avra Valley Alignment, from Pima County, 2013

Avra Valley Road, where the freeway is located near the Santa Cruz River and associated habitat. The Critical Landscape Connection across the I-10 at Marana has existed for many years and has been mitigated to some degree with wildlife underpasses.

The City of Tucson purchased about 22,000 acres of farmland in the Avra Valley in the 1970's and 1980's in order to acquire the associated water rights to augment dwindling groundwater supplies.⁴¹ After the introduction of Colorado River Water via the CAP canal in the late 1980's, these water rights were no longer needed, and some parcels were converted to groundwater recharge facilities. The remaining parcels have been allowed to return to a more natural state. The city has applied to the US Fish and Wildlife Service for an Endangered Species Act Section 10 Permit, which would mitigate for the "incidental take" of endangered species from development of the city's water and energy needs. The application is dependent upon the protection and conservation of resources on the city owned lands. The proposed I-11 Corridor through the Avra Valley would skirt or bisect 440 acres of habitat conservation plan lands, reducing the efficacy of the lands as mitigation for activities elsewhere.³⁸

Along the margins of the Avra Valley are federally protected conservation lands including Saguaro National Park, the BLM's Ironwood National Monument, and the Bureau of Reclamation's mitigation land for the impacts of the CAP canal. These areas provide habitat for plant and animal species, and the Avra Valley has been identified by Pima County as the location of several important landscape linkages for their movement between protected habitats.⁴²

Large swaths of the Avra Valley are effectively conserved today. These include lands managed by the National Park Service, Bureau of Land Management, Bureau of Reclamation, AZ State Land, State and County Parks, City of Tucson, and

I-2398 American Indian tribes. Impediments to connectivity and conservation on these lands include the Central Arizona Project (CAP) canal, Tucson Water groundwater recharge infrastructure, and existing roads.

Transportation and land use are inexorable linked. Where transportation infrastructure is installed, land development typically follows. In the Avra Valley, there is a very high correlation between the location of infrastructure and private land ownership; where private lands exist, development is present. If the Avra Valley I-11 supercorridor is constructed, certain lands are more vulnerable to real estate development pressure. The state lands of Arizona are managed for the benefit of its beneficiaries including Arizona schools. When there is demand, the State Land Department routinely sells off property to make a profit for its beneficiaries. Lands held by the American Indian tribes (Tohono O'odham and Pascua Yaqui) are not typically sold into private ownership, but can be vulnerable to development by tribal members.

While the Avra Valley is far from pristine, it is in close proximity to many lands that are in a very natural state, including federally protected land but also the Altar Valley, which lies to the south of the Ajo Highway/State Route 86. Development pressure along the Ajo Highway was very strong before the economic downturn in 2008. Adding a major interstate route through the area would only increase this trend.

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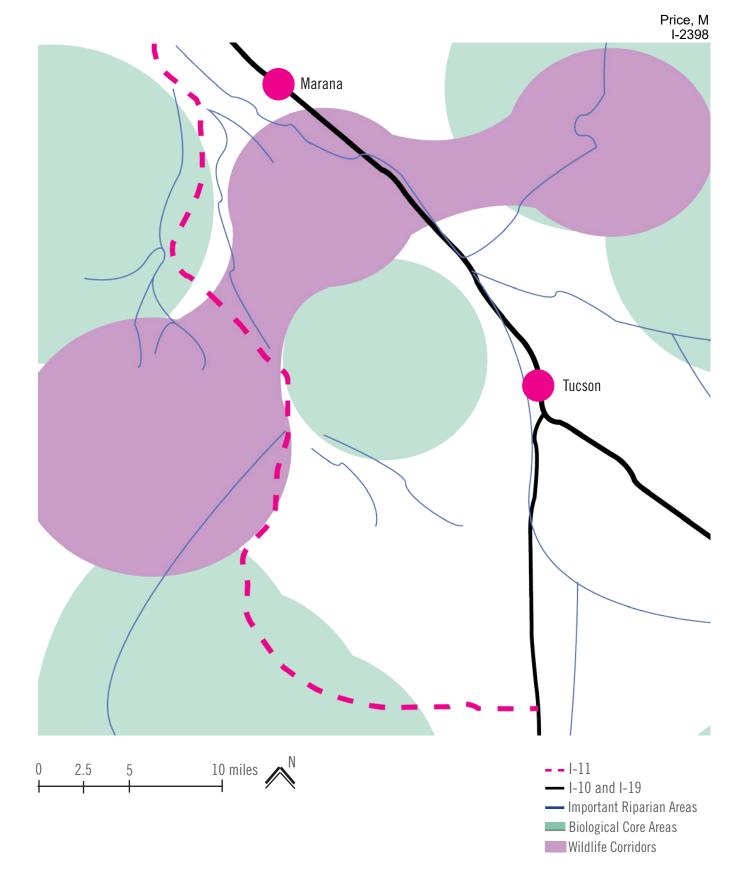


Figure 4-1-15. The Maeveen Marie Behan Conservation Lands System from Pima County, 2011⁴⁰

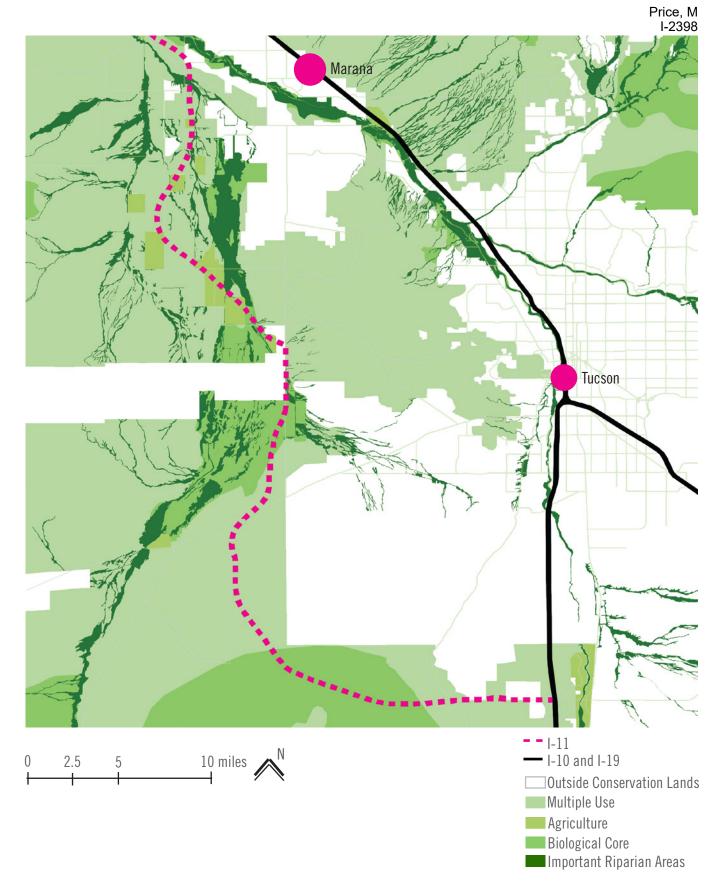


Figure 4-1-16. Pima County Land Conservation System

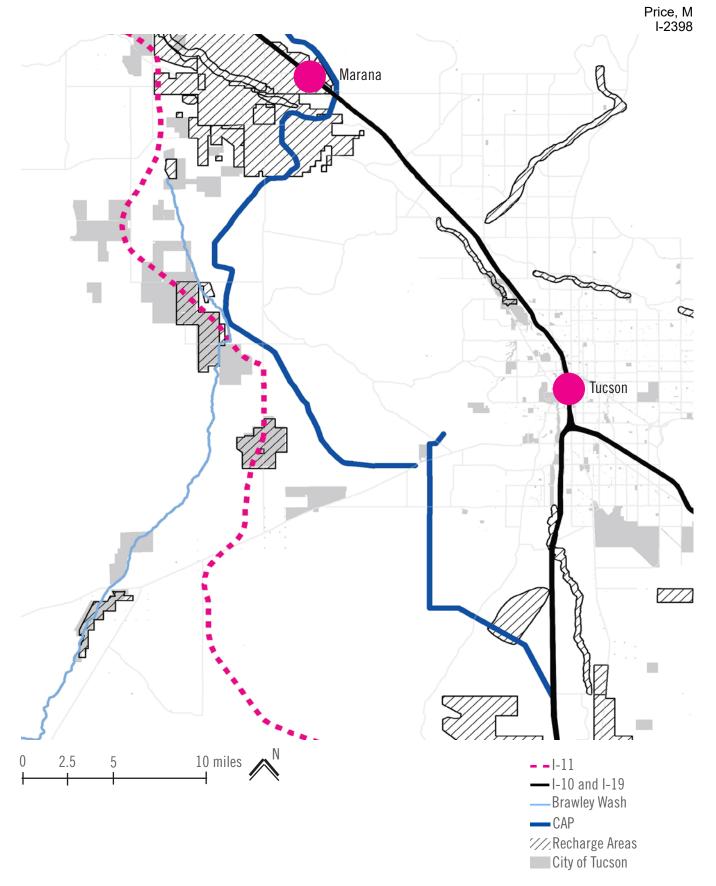
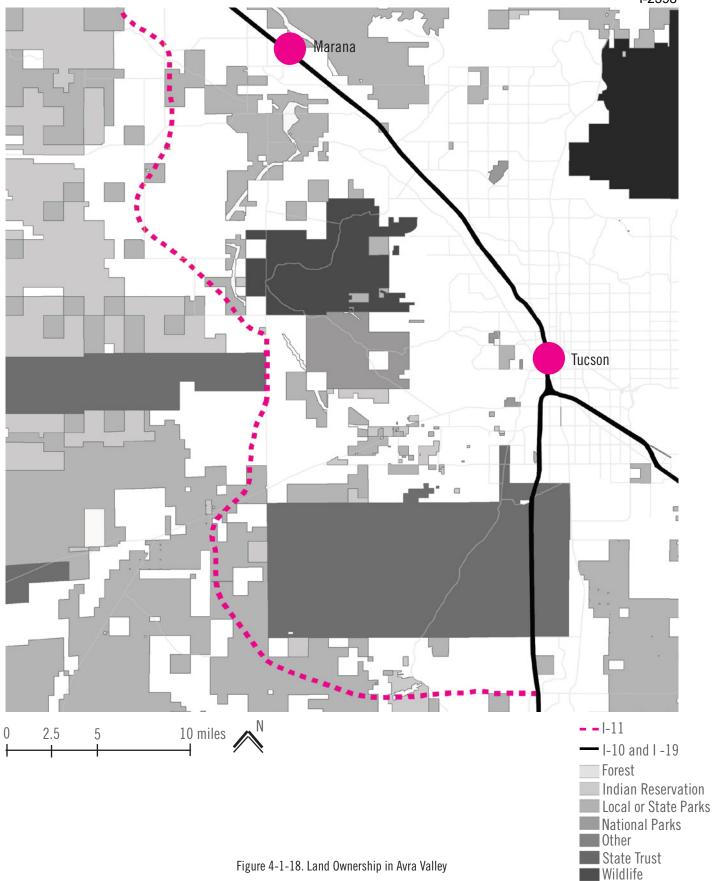


Figure 4-1-17. Water Resources in Avra Valley

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BLM

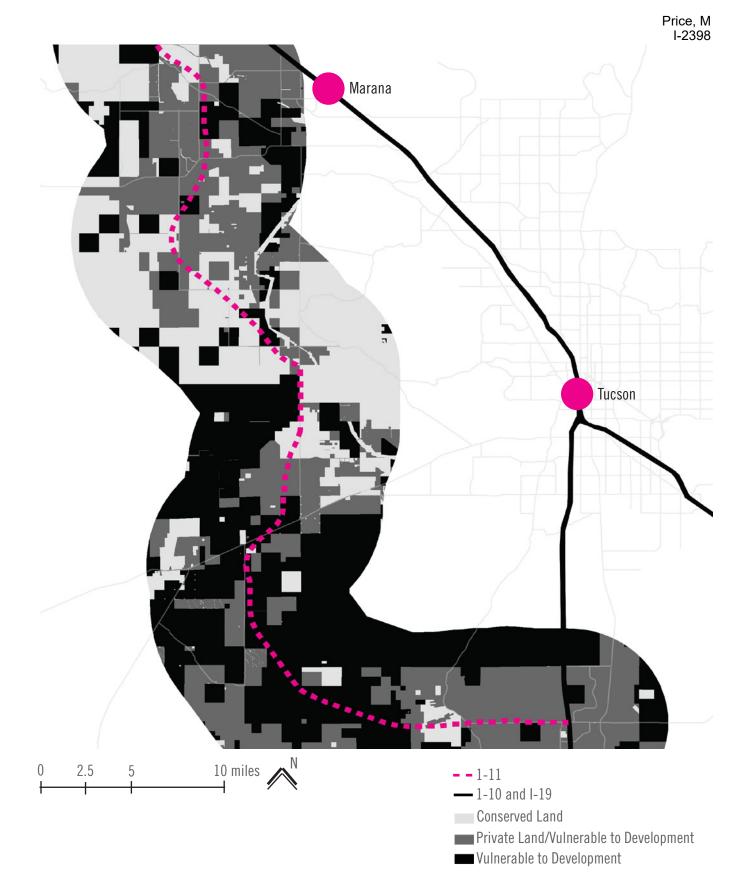


Figure 4-1-19. Vulnerable Land in Avra Valley

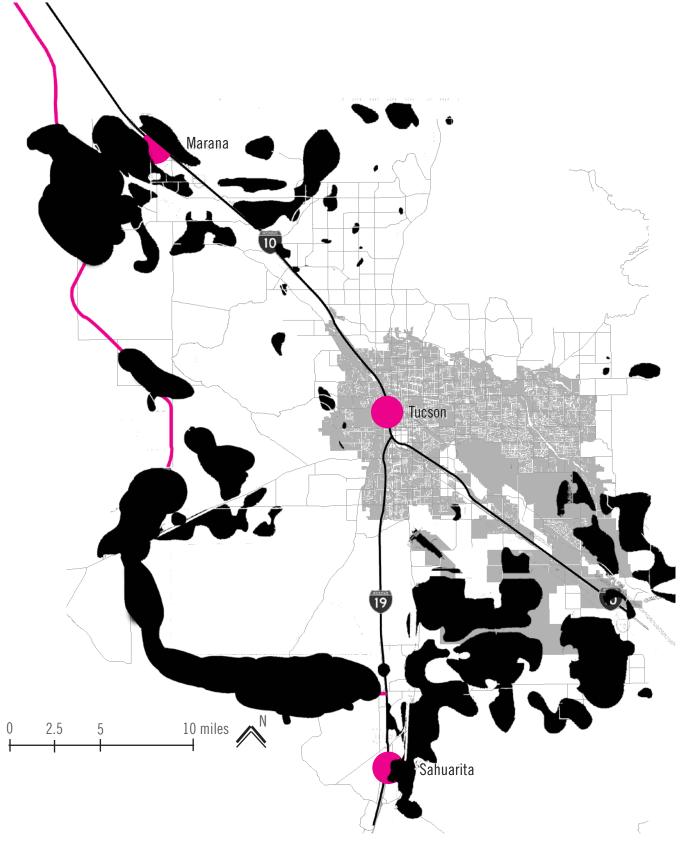


Figure 4-1-20. Speculative scenario based on I-11 supercorridor placed in the Avra Valley area

TRAFFIC IMPACTS OF THE I-11 SUPERCORRIDOR

The purpose of this section is to review the current volume of traffic along freeways within Pima, Pinal and Santa Cruz counties. Trends in current volumes are applied to traffic forecasts provided by local jurisdictions. Additional assumptions are used to complete a simple model that will identify the future needs of these freeways. In particular, we examine the number of freeway lanes that would be necessary to maintain an adequate level of service through the most congested portion of the route in Southern Arizona, downtown Tucson. The conclusions of this section question the necessity of developing a vehicle oriented bypass around Tucson and the addition of further capacity to the current facilities.

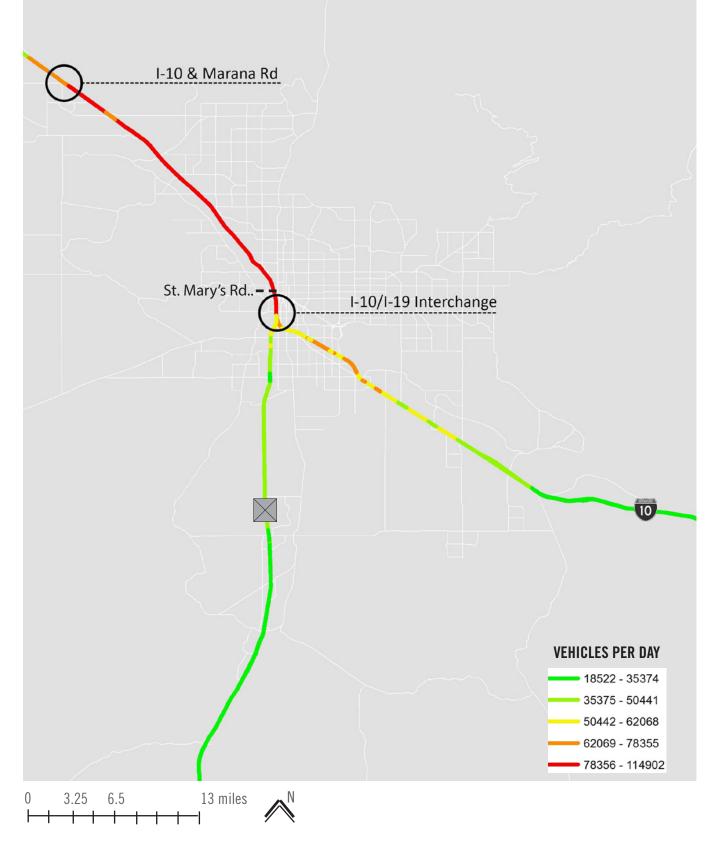
The traffic portion of this study focuses on Interstates 10 and 19 as they pass through the Tucson region. Outside the metropolitan area, the current counts and future forecasts are low enough to be secondary to these concerns. Specifically there is sufficient capacity outside of the Tucson Metro region to absorb additional forecast traffic without considerable degradation in level of service.

The current traffic for I-10 is 50,000 - 180,000 Average Annual Daily Traffic (approximation of field measurements ADOT, 2013). Projections for I-10 indicate 170,000 - 230,000 AADT (PAG 2030 forecasts). The current traffic for I-19 is 17,000 - 95,000 AADT, and the Projections indicate 36,000 - 117,000 AADT (PAG 2030 forecast).

Along I-10, the heaviest traffic occurs in the center of the city near St. Mary's Road. This is portrayed graphically in Figure 4-3-18 using PAG's 2030 traffic forecasts, which closely mimic relative values of current traffic volumes. Heaviest predicted traffic flow through on Interstate 10 through Tucson for 2030 is between the Marana Road exit and the I-10/I-19 interchange. The distance is about 25 miles.

Greater traffic in downtown Tucson core indicates that a considerable portion, approximately two-thirds of the traffic in the City of Tucson, is intercity traffic. This demonstrates that most traffic in Tucson consists of people entering and exiting the freeway within the city limits.

Around 2008 and 2009, there was a leveling off or even a slight drop in AADT throughout most of the United States. Possible causes of this change include the economic slowdown. It is interesting to note that daily traffic in 2013 had not recovered to pre-economic slowdown levels, suggesting the change may be the result of more than the 2008 economic crash. This undermines traffic forecasts that show gradual increases though 2030 and 2040.



Modeling traffic projections

To model the number of lanes necessary to handle the forecasted increase in traffic, we used a simple parametric model. Current trends were applied to the forecast with slight modifications to mimic expected changes. The metric of vehicles per hour per lane (vphpl) was used as a common measurement, with a goal of 1800-2090 vphpl. For additional rationale and evidence supporting all assumptions used, see Appendix.

The following assumptions were used in our model to forecast future traffic volumes:

- 1800-2090 vehicles per hour per lane (vphpl)
- Level of Service (LOS) minimum of C/D
- Peak demand = 8% AADT per hour
- Passenger/Freight Split: 80/20

The model measured traffic volume data by hour from four locations in Metro Tucson: I-10 and Marana Rd.; I-19 and W. Ajo Way; I-10 and Kino/Palo Verde; and I-19 & Arivaca Rd.. The peak hour from these four sites accounted for 7% of the daily total traffic volume. In the model a value of 8% was used to include anticipated growth.

Figure 4-2-19 shows the relative volume of various vehicle classes along I-10 in the Metro Tucson area. According to this figure approximately 15% of current traffic could be classified as freight. Due to the possibility of near shoring and potential changes to trade a value of 20% freight was used in the model leaving 80% as passenger vehicles.



Figure 4-2-22. Relative volume of vehicle by class in Metro Tucson on I-10

The Highest Daily Flow (HDF) is the greatest value from PAG's 2030 forecast along the particular freeway segment. As previously mentioned, these areas consistently fall in the Tucson Metro region. Leveled hour volume (LHV) is the number of vehicles per hour, assuming complete even distribution across an entire 24-hour period. This value is divided by estimated free flow volumes of 1800 and 2090 at level of service D to derive the number of vehicle lanes that would be needed if traffic was evenly spread across a 24-hour period. This value is not an achievable figure, however, it serves as a demonstration of how changes in travel times can have dramatic effects on infrastructure needs. Note that these values are lower than the current number of lanes on either of these freeways.

Peak hour volume (PHV) represents the portion of daily traffic experienced during "rush hour," when the highest travel demand is observed. PHV is equal to HDF multiplied by 8% resulting in the highest expected amount of daily traffic to pass through the region in an hour. PHV is divided by the estimated volumes of 1800 and 2090 vphpl at level of service D. This equates to the number of lanes that would be necessary for the forecasted traffic at the most congested times.

Workflow 2030 PAG								
	NB I-19	SB 1-19	I-19	Num. Passenger vehicles with 80/20 split	WB I-10	EB I-10	I-10	Num. Passenger vehicles with 80/20 split
Highest daily flow (HDF)	56,512	60,858	117,370	93,896	114,352	114,902	229,254	183,403
Leveled hour volume (LHV= HDF/24hrs)	2,355	2,536	4,890		4,765	4,788	9,552	
Number of Lanes needed for LHV (=LHV /1800 and 2090 vphpl)	1.31 - 1.13	1.41 - 1.21	2.72 - 2.34		2.65 - 2.28	2.66 - 2.29	5.31 - 4.57	
Peak hr vol. (PHV= 10% HDF)	4,521	4,869	9,390		9,148	9,192	18,340	
Number of lanes needed for PHV (PHV/1800 and 2090 vphpl)	2.51 - 2.16	2.70 - 2.33	5.22 - 4.49		5.08 - 4.37	5.11 - 4.40	10.12 - 8.78	

Table 4-2-6.	. Model used t	o calculate 2030	traffic projections
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Table 4-2-7 shows the current number of lanes, projected number of lanes needed to satisfy peak traffic in 2030 and the number of lanes needed in 2030 if traffic is spread evenly throughout a 24-hour period. Assuming no shifts in mode or changing congestion management, the model indicates additional lanes will be necessary. For I-19, the addition of one lane between of Ajo and Valencia Roads would be required. Interstate 10 would require the addition of two lanes in both direction. The costs of this type of expansion are detailed in the Costs section of this document.

	Lane Number Options					
Freeway	Number of existing lanes at congestion area	Number of lanes needed per model at peak	Number of lanes needed if traffic evenly distributed throughout 24-hours			
NB I-19	2-4	3	2			
SB I-19	2-4	3	2			
WB I-10	4	5-6	3			
EB I-10	4	5-6	3			

Table 4-2-7. Number of existing lanes versus the number necessary at various conditions

The last column in table, the number of lanes needed if peak is flattened, or averaged, is included to demonstrate the extreme effect the timing of trips has on traffic. Specifically, if traffic on a highway is constant all day long, the number of lanes needed are fewer than if traffic fluctuates by time of day. If this were possible, it would indicate no expansion would be necessary, and there would, in fact, be excess capacity on both freeways. Although this is not a realistic scenario, it demonstrates the power and effectiveness that reducing the peak can have. A later section explores policy and infrastructure methods and potential impact of reducing the peak's percentage of AADT.

Table 4-2-8 summarizes more realistic potential reductions in peak travel demand. Specifically a 3% reduction in passenger vehicle usage during rush hour would potentially reduce the number of lanes required on I-10 by one in either direction. A 12% reduction would cut the number of lanes necessary by one on I-19 and possible by two on I-10. The following section explores potential ways of achieving these reductions.

Anticipated Lane Needs						
Freeway	Existing number of lanes	Traffic forecasts with no shifts in mode share or congestion management	3% reduction in passenger vehicle traffic at peak congestion times	12% reduction in passenger vehicle traffic at peak congestion times		
I-10	4	5-6	5	4-5		
I-19	2	3	3	2-3		

Table 4-2-8. Anticipated lane needs at various peak demand reductions

Options to Reduce Peak Traffic

This section explores options for reducing the number of vehicle lanes necessary in coming years. There are environmental and social benefits in reducing peak traffic flow, which are covered in other portions of this document. The options explored below for reducing peak travel demand are divided into two rough categories: those that require substantial investment in infrastructure, and those that are more policy focused. It is important to note that modest changes in traffic patterns can reduce peak traffic sufficiently to minimize the need for freeway expansion. Although presented separately, a combination of the following ideas is the scenario most likely to reach maximum reduction in peak traffic.

Infrastructure Options:

Mass Transit Along Interstates With Accompanying Transit Network

This section investigates the infrastructure option of constructing a light rail system along interstate segments that are forecast to have the highest traffic. This option is well suited to Tucson, since nearly two-thirds of traffic is intra-city. In other words, most traffic is local residents entering and exiting the interstate to get from one part of Tucson to another part of Tucson.

The following equation is a simplified method for estimating rail capacity (Rail Transit Capacity). As utilized here, it is able to calculate the most economical frequency with relatively small cars.

Simple Rail Person Capacity⁴² = TPH x CPT x MSLPT x PHF

Where:

TPH = Trains per hour set to 20 (economical value)

CPT = cars per train set to 2

MSLPT = maximum schedule load per train set to 174 (based on Portland's Siemens car)

PHF = Peak Hour Factor set to 0.75 for light rail

Applying these values to the above equation results in 5,220 SRPC. This value represents an estimated capacity of a light rail line along the interstates in the Tucson Metro region. Assuming most personal vehicle use within the metro region is single occupancy, this represents a potential reduction of 4.5% of personal vehicles from I-10, if fully utilized. Such a reduction would limit the number of lanes needed to accommodate peak traffic times projected for 2030 from 6 to 4 lanes in either direction.⁴² Other jurisdictions have performed similar analyses with similar results.

Portland's Green Line has similar characteristics to the option explored here. Its alignment is along a freeway through an urban area and is moderate in length at 8.3 miles. The Green Line has a total cost of \$575.7 million.⁴⁴ Estimated cost of the lines is \$69 million per mile. Others have argued that the true cost of the green line is substantially higher, perhaps as much as \$200 million per mile.⁴⁵ Los Angeles is currently undergoing an expansion of their Gold Line along Interstate 210. The cost is slated at \$751 million for the 11.5 mile stretch.⁴⁶ This equates to an approximate cost per mile of \$65 million. Taking into consideration the relatively higher property and construction costs of these two metro regions in comparison to Tucson, an estimation of \$65-75 million per mile is a conservative figure for evaluation purposes.

Policy Options:

Freight Only Lanes

Freight only lanes are dedicated lanes for use by trucks only. The goal of these lanes is to separate trucks from other traffic such as passenger vehicles. The lanes are intended to improve the flow of traffic and to increase safety for both cars and trucks.

There are very few truck only lanes in operation in the United States. The State of California has two separate truck only lanes, both on Interstate 5. There are studies ongoing for truck lanes on I-70 in Missouri and on several interstates in the Chicago area.⁴⁷

Carpooling / HOV lanes

Dedicated lanes to vehicles carrying at least two passengers. The purpose is to move a greater number of people through a fast lane giving prioritize HOV (High Occupancy Vehicle) lanes do not require more infrastructure investment.

Options to alter commute patterns

Telecommuting and flextime are two options that can help reduce the number of workers commuting at peak traffic times. If either of these strategies or a combination of the two increased by 3%, the number of lanes needed to satisfy the LOS standard of C or D and peak traffic times for PAG's 2030 projection would drop from 6 lanes in either direction to 5 lanes in either direction. This was calculated by reducing the number of passenger vehicles by 3% after separating the number of personal vehicles from the total traffic volume using the 80/20 split ratio.

Promotion of commuting and flextime

Telecommuting, also known as telework, is the practice of performing work duties away from the office, typically from the comforts of home. Peak traffic time is curbed by allowing individuals, who would normally drive to work, stay at home. Generally, telecommuting is only used for a portion of the work week, but even slight modifications can have a positive impact on reducing peak traffic.

Although telecommuting had a large upturn in the late 90's and early 2000's, more recently multiple large employers have restricted their telecommuting policies.⁴⁷ But the practice has continued to grow in the US over the past decade.⁴⁸ Roughly 2.6% of non-self-employed people working in the US telecommute at least 50% of the time.⁴⁹ Despite high publicity cases at Best Buy and Yahoo!, where the practice of telecommuting has been restricted, one study found that approximately 15% of workers telecommute at some point in time. Telecommuting does favor college-educated, managerial and professional positions.⁵¹

Flextime or flexible work schedules provide more work time options, from which employees may choose. This allows a greater number of individuals to choose work start and finish times that are not the traditional 9 am to 5 p.m. These traditional times are the driving cause of "rush hour" between 7-9 am and 5-7 pm, when traffic is at its daily peak. If employees are given the option and elect to come into work an hour earlier or later, peak traffic would be reduced.

Flextime can also include a change in a shiftwork or work week schedule. This can include going to a four day workweek of ten hour days, thus maintaining the 40 hour workweek, but reducing the work commute trips by 20%.

According to a 2004 BLS News bulletin the percentage of full-times workers eligible for flexible work schedules was 27.5%. However the bulletin also mentioned that only 1 in 10 of those eligible workers actually took advantage of the opportunity.

Both flextime and telecommuting only impact work related commute trips. Other necessary trips, such as grocery shopping or taking children to school, are not affected by changes in a work location or schedule.

Additional Factors

- Land use change towards more dense and mixed use development
- Generational shift toward less driving
- Regulation on freight during peak congestion
- Carbon tax

If the Tucson Metro region continues to grow as it has in previous decades and no modifications are made to mode share

I-2398 or congestion management techniques then it is likely that the level of service will drop significantly in the downtown region during peak travel times with the existing infrastructure. However, this sections shows that with modest changes in mode share, or trip timing current facilities can be maintained with no loss in level of service. The options identified above should be fully explored and exhausted prior to any I-10 or I-19 freeway widening projects are considered.

COSTS

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Land Acquisition for the I-10 Corridor Alignment

For most properties, land values will continue to appreciate each year. The right-of-way costs for highway expansion or new construction will inevitably increase as well. With growing attention paid to the I-11 Corridor in Southern Arizona, it is not unreasonable to assume right-of-way costs could exceed construction costs. Some land being considered for this project is within the jurisdiction of Arizona State Land Department, which typically auctions land to the highest bidder to fund trustees.

In this section, right-of-way costs were estimated by using spatial data from the Pima County Assessor's Office reporting full assessed property value for parcels along existing corridor segments. To be conservative, the highest full assessed property value for each segment was used to determine right-of-way costs. In the case of the Western Freeway Loop and the Barraza Aviation Parkway, which are in rural areas, average assessed values were very low, and so higher average right-of-way costs from nearby corridors were used. The assessed values were then divided by a ratio of total assessed

value to estimated actual total value of (0.13) based on information from the City of Tucson for the last 10 fiscal years.^{59,60} An estimate of probable cost for right-of-way acquisition is presented in Table 4-4-13. These estimates are derived from the Kimley-Horn report, which was adjusted in April 2008. The estimate does not include right-of-way required for system and service interchanges. In addition, this cost does not include relocation costs, which may be a significant expense. Depending on the type of property, relocation costs can be as much as right-of-way costs.

Avra Valley Alignment

The Avra Valley alignment is 56 miles long and was mapped and analyzed very generally using Pima County Geographic Information Systems (GIS), for the Intermountain West Corridor in Pima County: Preliminary GIS-Based Roadway Alignment and Impact Study. No field studies were conducted for this report, and a full inventory and analysis of corridor conditions and impacts is not within the scope of the study presented by Pima County. The key statistics presented in the proposed route include:

- 56 mile long route, 300' wide right-of-way;
- 2,035 acres of right-of-way required;
- 179 parcels of land impacted;
- All lands unincorporated, except 4 acres in the Town of Sahuarita; and
- 111 private parcels, 492 acres impacted

There are a variety of challenges presented in developing this proposed route, including a 2 mile section that does not have adequate width for the proposed right-of-way. This section is adjacent to the Tohono O'odham Nation (Garcia Strip) and the Bureau of Reclamation (BOR) Wildlife Mitigation Land. This section is currently bisected by the existing Sandario Road, which is 2 lanes with a width of 80 feet. This section is an area of concern for design, which would need to be resolved. Pima County has suggested the use of an elevated highway through this section, but right-of-way acquisition from either or both property owners might still be necessary.

The proposed roadway through Avra Valley impacts a total of 179 parcels of land, which range in size from a fraction of an acre up to 132 acres, but the average parcel size is 11 acres.

Loop Corridor Name	Total Acres of Right-of-way	Unit Cost / Acre (\$)	Total Right-of-way Cost (\$)
Western Freeway Loop	1210	223,000	\$269,830,000
Southern Freeway Loop	1353	223,000	\$301,719,000
Houghton/Golf Links Parkway	8	346,000	\$2,768,000
River/Alvernon Swan Parkway	39	885,000	\$34,515,000
Kolb/Orange Grove Parkway	21	962,000	\$20,202,000
La Cholla Parkway	576	615,000	\$354,240,000
Barraza-Aviation Parkway Extension	245	346,000	\$84,770,000

Table 4-3-9. Acquisition cost for existing projects in the Tucson area

Land Use	Total Acres of Right-of-way	Unit Cost / Acre (\$)	Total Right-of-way Cost
Vacant	90	1,348	66%
Agricultural	30	296	15%
Mining	6	116	6%
Commercial	2	82	4%
Roadways	-	72	4%
Residential	47	67	3%
Retired Farm	3	54	3%
Total	179	2,035	100%

Table 4-3-10. Parcels impacted by the proposed Avra Valley alignment from Pima County, 2013³⁸

Vacant Land	Ownership	Parcels	Acres	Percent Acres
	State Trust Lands	30	826	61%
	Federal	11	177	13%
	City of Tucson	10	177	13%
	Private	36	140	10%
	Pima County	2	28	2%
	Commercial	1	0.2	<1%
Total		90	1,348	100%

Table 4-3-11. Vacant lands impacted by the proposed Avra Valley alignment, 2013⁴⁷

Parcels	Ownership	Acres	Percents
30	State of Arizona	826	41%
111	Private	492	24%
25	City of Tucson	440	22%
11	Federal	176	9%
-	Roadway (public)	72	3%
2	Pima County	28	1%
179	Total	2,035	100%

Table 4-3-12. Land ownership in the Avra Valley, 2013

Parcels		Acres	Percents
19	Agricultural	166	34%
36	Vacant	140	28%
6	Mining	116	24%
47	Residential	67	14%
1	Commercial	2	1%
2	Other	0.2	<1%
111	Total	492	100%

	I-2398
What will each of these alternatives cost?	Total
Maintenance & Operations	26%
Highway Capacity Expansion	23%
Highway Reconstruction, Rehabilitation & Restoration	19%
Highway Administration	9%
Highway Patrol & Safety	8%
Local Road Capital Improvements	8%
Interest on Debt	4%
Other	3%

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Table 4-3-14. Cost categories and portion of total expenditures in US roadway costs⁵²

Cost Allocation

The costs of roadway construction are allocated by vehicle classes and charged as roadway user payments by those classes.^{53, 54} User payments are the fees and taxes charged to road users. This includes tolls, taxes, registration fees and weight-distance fees. It does not include general taxes on vehicles and fuel.⁵⁵

Internal and External Costs

User fees often do not account for the full cost of roadways. Expenditures not fully funded are considered external costs.. A 2008 report indicates that user fees would need to double in order to pay for the cost of roadways. Table 4-3-15 summarizes user fees and expenditures.⁵⁶

	User Fees	Other Taxes	Total
Federal	\$30.8 (74%)	\$11.1 (26%)	\$41.9 (100%)
State	\$59.0% (60%)	\$38.7 (40%)	\$97.7 (100%)
Local	\$4.3 (8%)	\$48.4 (92%)	\$53.1 (100%)
Total	\$94.1% (49%)	\$98.6 (51%)	\$192.7 (100%)
Per Vehicle-mile (2,974B VMT)	3.2¢/mile	3.3¢/mile	7.5¢/mile

Table 4-3-15. Roadway Expenditures by Level of Government (2008 \$Billions)

I-10 Corridor Alignment

I-10 currently passes through downtown Tucson. Due to its urban location, it is estimated the costs of capacity expansion would range between \$8-12 million per lane-mile for land acquisition, lane pavement, and intersection reconstruction.⁵⁷ This section explores three potential scenarios for the widening of I-10. In addition, the stretch between the Marana Road exit and the I-10/I-19 interchange would be the only section requiring expansion to meet future capacity demands. Table 4-3-16 summarizes the typical costs of highway expansion.⁵⁸

Avra Valley Alignment

There were several steps in this process of evaluating the estimated cost of building the Avra Valley Route in comparison to widening I-10 through Tucson. First and foremost was to calculate the existing capacity of I-10 and then evaluate population and traffic projections with the additional flow from I-11. Next was to determine whether these projections would necessitate an expanded roadway through Tucson, what the cost would be and then compare that to the cost of building a new road through Avra Valley. The majority of the costs were taken from a report published by the Kimley-Horn group, who did an extensive analysis of the costs of this project. They were projected forward using a 3% inflation assumption.

The study included⁵⁸:

- Construction Costs (per mile or interchange)
- Construction Contingency Costs (estimated at 20% of construction costs)
- Construction Administration Costs (estimated at 15% of construction costs)
- Pre-design Costs (estimated at 5% of construction costs)
- Design Costs (estimated at 10% of construction costs)
- And Right-of-way Acquisition Costs (1210 acres at \$223,000 per acre)
- Total cost of the project is estimated to be \$4.2 billion in 2025

At \$4.2 billion, the potential cost of the Avra Valley route is similar to cost estimates of a high speed rail system between Tucson and Phoenix. Furthermore, the downtown expansion alternative to 6 lanes has cost in excess of installing an eightmile light rail system. The enormous costs of either developing the Avra Valley alignment or expanding the downtown Tucson corridor should cause pause and reflection on what other amenities those same funds could provide.

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	Freeways		Other Divided Highways		Undivided Highways	
	Built-Up Areas	Outlying Areas	Built-Up Areas	Outlying Areas	Built-Up Areas	Outlying Areas
Right-of-way for new lanes	632	253	570	229	514	209
Constructions of new lanes	2541	2138	2288	1922	2057	17287
Reconstruction with new lanes	3173	2391	2858	2152	2572	1936
Reconstruction with wider lanes	2330	1682	2099	1514	1889	1362
Intersections	15000	10000	2000	4000	500	100
Pavement reconstruction	1628	1466	1471	1321	1326	1190
Major Widening	1300	1043	1173	940	1052	845
Widening	940	721	845	648	760	584
Resurfacing & Shoulder Improvements	443	388	400	350	361	314
Resurfacing	193	178	175	158	157	145

Table 4-3-16. Typical costs of highway expansion

Proposed Loop	4-lanes	6-lanes	8-lanes	Service Interchange	System Interchange	Total
Length in Miles, # interchange	32	4	13	6	3	
Construction Cost	15	23	30	15	100	
Construction Cost (Million\$)	476	95	402	90	300	
Construction Con- tingency (Million\$)	95	19	80	18	60	
Construction Administration (Million\$)	71	14	60	14	45	
Pre-design Studies (Million\$)	24	5	20	5	15	
Design Costs (Million\$)	48	10	40	9	30	
Total Estimated Cost	713	143	602	135	450	2044
Total Estimated Cost Total ROW (Million\$)						270
Total 2025 (\$Million) 3% inflation						4179

Table 4-3-17. Total Estimated Cost of Avra Valley Route 2025 \$Millions⁵⁷

5

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CONCLUSION

5.1

Summary of findings

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The residents of Pima County envision their region differently than residents in other areas of Arizona. For more than a decade, they have spoken with a clear voice about how they want their towns and cities to grow. These desires include seeing their community develop with sensitivity to natural areas. They want denser development, which limits the extent of the impact of human habitation. They want a city surrounded by intact Sonoran Desert and Sky Island ecosystems. The public vision for the future of this area is contained in several key sources such as the 2001 Sonoran Conservation Plan, a bold guide for land-use decisions in the county; Imagine Greater Tucson, an envisioning exercise conducted between 2010 and 2012 with ten thousand participants from Pima County; and Plan Tucson, the general and sustainable plan for the city of Tucson adopted by voters in 2013. The potential for a new interstate was not incorporated in these visioning documents.

Yet, Southern Arizona is growing and the evaluation of an expanded infrastructure network must take into account a vast range of economic, environmental, and social concerns – and opportunities – from hundreds of stakeholder groups. These range from national manufacturers and federal agencies to wildlife habitat specialists and centuries-old Native American peoples who inhabit much of the land in the Avra Valley area. A proposal so large would impact not just car and truck traffic, but freight rail, passenger rail, water, energy, air quality, human and environmental health, among others. Because I-11 is also an international route, the decision to move forward must take into account the stakeholders at every level – local, regional, national, and international – as well as the public interest.

The greatest fear in Southern Arizona is the negative environmental impact of I-11, especially in the sensitive natural landscape surrounding Avra Valley. Data presented in this study does not support the rationale to build a new road through that area. A new road would significantly compromise the environmental integrity of this relatively intact environment, which could negatively impact tourism, animal habitats, water resources, as well as national, local, and state parks and preservation lands. Furthermore, a new road would invite continued urban sprawl, a negative detriment to the vision held by the regional residents and a development pattern destructive to best environmental, economic, and social practices.

I-11 emerged from concerns over existing infrastructure's capacity to handle all future growth assuming no improvements are made. Data suggests that the State of Arizona and Pima County are both net importers of freight suggesting that the

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area is weak in manufacturing. There is unlikely to be an increase in international freight movement significant enough to justify the cost of building a bypass of Tucson through the Avra Valley. Although there is consensus that the new I-11 Corridor would attract an increased number of vehicles, this study finds that the additional traffic could be accommodated through existing roadways plus the alternative modes of transportation already anticipated in the time frame studied. Public transportation such as regional passenger rail, bus rapid transit, and light rail will take a proportion of the car traffic from the most congested areas. Changes in technology, development patterns, behavior patterns and adaptation of additional policy could mitigate the concerns of traffic congestion on the existing infrastructure. It is critical to note that decisions such as these now – to emphasize more productive options utilizing all the tools available – can lead the region into a more progressive direction as well as vastly improve the environmental footprint of our transportation future.

Planning, as a discipline, provides strategies that influence design and shape the future of the built environment through objective analysis and empirical data. Through land use regulations and controls, planning serves as the foundation for design implications to improve the health, safety, and general wellbeing of the public. We offer this study as a step in helping our community achieve those admirable goals.

Price, M I-2398

6

APPENDIX

6.1

RATIONALE & EVIDENCE FOR 1,800 VPHPL

The Highway Design Manual includes information about multiple urban areas with similar characteristics to the Tucson metro area of the future: higher total traffic volume, and a higher proportion of heavy vehicle traffic. These areas included I-70 and I-71 through Columbus, Ohio and I-5 though Seattle, Washington. Each of these eight lane freeways has measured peak traffic of 2088 – 2554 vphpl. This data was used to select 1,800 vphpl as a conservative estimate of the tolerable amount of traffic in Tucson. While Tucson currently has a vphpl of approximately 1,200, the three interstates listed above have an average of 1550-1670 vphpl.

The California Department of Transportation offers the following alternative formula for calculating free flow vphpl:

FC = F*100 / [(100+P*(E-1))]

Where:

FC = Free Flow Capacity (vphpl)

- F = Roadway capacity (2,300 passenger car per hour per lane (pcphpl) for multi-lane highways)
- P = percentage of heavy vehicles (20%)
- E = Passenger car equivalent (1.5 rolling)

Following this equation the free flow capacity for the I-10 segment through Tucson is 2,090 vphpl, further demonstrating the conservative nature of the 1,800 vphpl value.

RATIONALE & EVIDENCE FOR LOS C/D

Typically, communities strive to achieve high marks for their transportation level of service (LOS). However, attitudes are gradually changing toward this method of evaluating transportation systems. Using the following Speed-Flow Curves and LOS it was determined that an LOS above D is reasonable and prudent assuming speeds stay at approximately 55 mph or higher. Currently the majority of the area included in the model has a posted speed limit of 65 mph with the exception of construction zones.

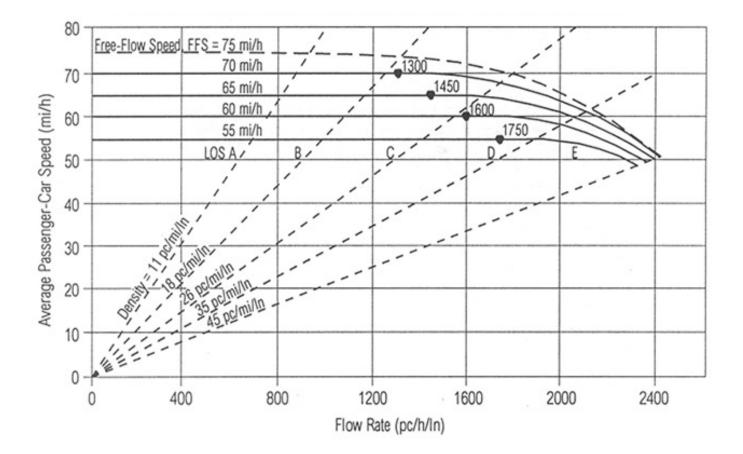


Figure 6-2-23. Level of service is determined with a speed-flow curve that compares travel speed with the number of vehicles on a roadway

RATIONALE & EVIDENCE FOR PEAK TRAVEL AT 8% OF AADT PER HOUR

ADOT's Transportation Data Management System was utilized to survey data collection sites in and around Tucson. Four sites were identified that record the necessary data of daily traffic patterns. A series of simple line graphs show the results from these four locations for 2013, the most recent year available. In these figures the highest percentage of daily traffic per hour (peak traffic time) is 7.4%. As the Tucson metro area grows, so too will the inter-city traffic. Furthermore, as trade grows in the region more truck freight is expected. For these reasons, this model includes a peak percentage of daily traffic per hour of 8%.

FIGURES

Price, M I-2398

Figure 1-2-1. Six cities and seven focus sites (two in Tucson) along the Southern Arizona section of the proposed I-11 route, map by Bernardo Teran.

Figure 1-2-2. Infrastructure Context

Figure 2-1-3. Connectivity to Guaymas Port, Mexico ⁵

Figure 2-1-4. Growth of Total Cargo Volume in the Mexican National Port System, 2010-2011⁸

Figure 2-2-5. US Megaregions ¹⁴

Figure 2-2-6. Location of points of entry for road & rail freight at the US-Mexico border

Figure 2-3-7. Existing rail lines in Arizona and Nevada²⁵

Figure 2-3-8. Proposed California High Speed Rail System

Figure 2-3-9. Alternative routes for passenger rail between Tucson and Phoenix²⁹

Figure 3-1-10. I-11 alternative alignments through Southern Arizona

Figure 3-2-11. Imagine Greater Tucson expected growth, 2013 ³⁰

Figure 3-2-12. Tucson General Plan expected growth, 2013 ³¹

Figure 3-3-13. 2010 - 2040 Population Growth Rate for Southern Arizona

Figure 4-1-14. Proposed I-11 noise impact in the Avra Valley

Figure 4-1-15. The Maeveen Marie Behan Conservation Lands System from Pima County, 2011 ⁴⁰

Figure 4-1-16. Pima County Land Conservation System

Figure 4-1-17. Water Resources in Avra Valley

Figure 4-1-18. Land Ownership in Avra Valley

Figure 4-1-19. Vulnerable Land in Avra Valley

Figure 4-1-20. Speculative scenario based on I-11 supercorridor placed in the Avra Valley area

Figure 4-2-21. PAG's Traffic Forecast for 2030

Figure 4-2-22. Relative volume of vehicle by class in Metro Tucson on I-10

Figure 6-2-23. Level of service is determined with a speed-flow curve that compares travel speed with the number of vehicles on a roadway

TABLES

Price, M I-2398

Table 2-2-1. Top 5 U.S. - Mexico Road Ports, 2004

Table 2-2-2. Top 5 U.S. - Mexico Rail Ports, 2004

Table 2-2-3. Freight movements in Arizona, 2008²⁵

 Table 2-2-4. Commercial trips in Pima County on a "typical day", 201427

Table 4-1-5. Conservation Land System impacted by theAvra Valley Alignment, from Pima County, 2013

 Table 4-2-6.
 Model used to calculate 2030 traffic projections

Table 4-2-7. Number of existing lanes versus the number necessary at various conditions

 Table 4-2-8. Anticipated lane needs at various peak

 demand reductions

Table 4-3-9. Acquisition cost for existing projects in theTucson area

Table 4-3-10. Parcels impacted by the proposed AvraValley alignment from Pima County, 201372

Table 4-3-11. Vacant lands impacted by the proposedAvra Valley alignment, 201373

Table 4-3-12. Land ownership in the Avra Valley, 2013

Table 4-3-13. Land uses on private land in the Avra

Valley, 2013

 Table 4-3-14. Cost categories and portion of total

 expenditures in US roadway costs 74

Table 4-3-15. Roadway Expenditures by Level ofGovernment (2008 \$Billions)

 Table 4-3-16.
 Typical costs of highway expansion

 Table 4-3-17. Total Estimated Cost of Avra Valley Route

 2025 \$Millions⁸⁴

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OTHER RESOURCES

Price, M I-2398

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- 4. 'Smart' Highway Corridors Urged for Arizona and Nevada http://www.sonoraninstitute.org/mediaroom/811-news-release-342014.html
- 5. CANAMEX Corridor http://www.canamex.org/
- 6. I11 Supercorridor http://i11supercorridor.weebly.com/ resources.html

May 8, 2019

MELVIN PRITT 21995 W EL GRANDE TRAIL WICKENBURG, AZ 85390

To whom this concerns,

I am writing this letter today to express my concerns with the proposed I-11 Draft tier 1.

I am a homeowner in the Vista Royal Subdivision located 6 miles west of Wickenburg. I have been a resident for 10 years. My choice to purchase a home in this subdivision was made due to two reasons. First, the quality of homes located in the area and second, having access to government land behind my home. If the purposed highway is built as you have presented, the road would be placed between my house & horse barn. Obviously this creates a problem.

A highway so close to the Vista Royal subdivision will greatly reduce the property values of all the homes located in this area. My home would likely have to be removed all together. My objection is not the highway itself, it is that there is miles of state land directly behind my home that could be used to build this highway, without loss of my home.

Most if not all the residents of Vista Royal have homes in this area because they are avid outdoorsman, and value having government land so close to their homes, which allows them to ride horses, hike, bike or use their off road vehicles. Building this road where it is proposed does not allow for the residents of Vista Royal to use this land.

The economic loss to this community and its residents should be enough to consider an alternative route for the proposed highway. Besides economic loss, there is loss of wildlife to consider as they will also be impacted by the construction of this road.

Thank you for including us in the decisions you are considering for our area. It is our hope that you will take are concerns into consideration before making any final decisions.

Melvin Pritt

574-596-3531