



## **Appendix B Correspondence Received from Participating Agencies**

Appendix B: Correspondence Received from Participating Agencies

Last Name	First Name	Organization	Submission	Method	Attachment	Tracking ID
Huckelberry	Chuck	Pima County	<p>Good afternoon I-11 Tier 1 EIS Study Team,</p> <p>The attached communication is being submitted to you on behalf of Pima County Administrator, Chuck Huckelberry.</p> <p>Respectfully submitted,</p> <p>~Monica Monica Perez Chief Assistant to Pima County</p> <p>Dear I-11 Tier 1 EIS Study Team:</p> <p>Pima County appreciates the opportunity to provide comments on the Federal Highway Administration (FHWA) and the Arizona Department of Transportation (ADOT) Interstate 11 Corridor Tier 1 Final Environmental Impact Statement (FEIS).</p> <p>We very much appreciate the agencies' consideration of the supplemental information regarding Pima County 4(f) properties that we submitted on December 6, 2019. We are very pleased the agencies have agreed to consider 9 of the 15 parks, recreation areas, and wildlife refuges that were submitted for consideration under Section 4(f), which are listed in Section 4.5.1.2 of the FEIS. We look forward to further consultation with FHWA and ADOT during Tier 2 studies regarding these properties as well as additional discussion regarding the reasons for omitting the other six properties from consideration.</p> <p>We also want to thank FHWA and ADOT for acknowledging Pima County's role in the management of the Tucson Mitigation Corridor (TMC) and the fact that "any development other than wildlife habitat improvements require agreement by Reclamation, Arizona Game and Fish Department, the U.S. Fish and Wildlife Service, and Pima County." (FEIS Appendix H3, Response ID No. PA-11-4.) Should Tier 2 studies include the west option of the preferred alternative, we look forward to coordinating with FHWA and ADOT on those studies for the TMC, along with the other managing agencies.</p> <p>As you are aware, the Pima County Board of Supervisors in 2007 passed a resolution in opposition to "any new highways" that would effectively bypass Interstate 10, due to impacts that "could not be adequately mitigated". This resolution, however, supported continuation of studies to bring forth the "full costs of mitigation measures".</p> <p>The Pima County Board of Supervisors today passed a new resolution in opposition to the West Option of the Preferred Alternative due in part to the belief that impacts to the East Option (I-10 corridor) can in fact be mitigated (Attachment 1). This position and additional written comments are provided as Attachment 2 to this letter for the agencies' consideration as they move forward on the Tier 2 studies and draft environmental impact statement.</p>	email	Huckelberry_PimaCo_1846	1846
Huckelberry	Chuck	Pima County	<p>Dear I-11 Tier 1 EIS Study Team:</p> <p>Pima County appreciates the opportunity to provide comments on the Federal Highway Administration (FHWA) and the Arizona Department of Transportation (ADOT) Interstate 11 Corridor Tier 1 Final Environmental Impact Statement (FEIS).</p> <p>We very much appreciate the agencies' consideration of the supplemental information regarding Pima County 4(f) properties that we submitted on December 6, 2019. We are very pleased the agencies have agreed to consider 9 of the 15 parks, recreation areas, and wildlife refuges that were submitted for consideration under Section 4(f), which are listed in Section 4.5.1.2 of the FEIS. We look forward to further consultation with FHWA and ADOT during Tier 2 studies regarding these properties as well as additional discussion regarding the reasons for omitting the other six properties from consideration.</p> <p>We also want to thank FHWA and ADOT for acknowledging Pima County's role in the management of the Tucson Mitigation Corridor (TMC) and the fact that "any development other than wildlife habitat improvements require agreement by Reclamation, Arizona Game and Fish Department, the U.S. Fish and Wildlife Service, and Pima County." (FEIS Appendix H3, Response ID No. PA-11-4.) Should Tier 2 studies include the west option of the preferred alternative, we look forward to coordinating with FHWA and ADOT on those studies for the TMC, along with the other managing agencies.</p> <p>As you are aware, the Pima County Board of Supervisors in 2007 passed a resolution in opposition to "any new highways" that would effectively bypass Interstate 10, due to impacts that "could not be adequately mitigated". This resolution, however, supported continuation of studies to bring forth the "full costs of mitigation measures".</p> <p>The Pima County Board of Supervisors today passed a new resolution in opposition to the West Option of the Preferred Alternative due in part to the belief that impacts to the East Option ("10 corridor) can in fact be mitigated (Attachment 1). This position and additional written comments are provided as Attachment 2 to this letter for the agencies' consideration as they move forward on the Tier 2 studies and draft environmental impact statement.</p> <p>Sincerely, C.H. Huckelberry County Administrator</p>	mail	Huckelberry_PimaCo_2588	2588
Lindstrom	Shane	San Carlos Irrigation and Drainage District	<p>As SCIDD has referenced many times in the past, SCIDD has numerous open-channel canals, piped laterals and groundwater wells within the I-11 Corridor Study Area. Due to the 2,000 foot corridor, obviously specific impacts cannot be quantified at this time.</p> <p>Any crossing or impact to the SCIDD system will require engineering review to ensure SCIDD can properly operate and maintain the irrigation system. This could very likely result in the need for improvements to the irrigation system if the new I-11 roadway impacts our operations and/or maintenance activities. Additionally, construction oversight by SCIDD is mandated on any construction project that impacts our system.</p> <p>These impacts will require a negotiated resolution with all costs incurred by SCIDD to be compensated by the State. This includes, but is not limited to all SCIDD administrative, design, design review, and construction related expenses.</p> <p>Additionally, all crossings of the BIA-San Carlos Irrigation Project easement will require an encroachment permit from the BIA.</p> <p>Best Regards, Shane Lindstrom, General Manager San Carlos Irrigation and Drainage District 120 S. 3rd Street Coolidge, AZ 85128 Office: 520-723-5408 ex 15 Cell: 520-251-1552</p>	Email		2549
Lorefice	Vince	Town of Wickenburg	<p>From: Tim Suan &lt;tsuan@wickenburgaz.org&gt; Date: Thu, Aug 5, 2021 at 1:25 PM Subject: WICKENBURG -COMMENT Tim Suan Deputy Town Manager   Economic Development</p>	Email	Lorefice_Wickenburg_0893	893

Last Name	First Name	Organization	Submission	Method	Attachment	Tracking ID
			<p>155 N. Tegner St., Suite A Wickenburg, AZ 85390 928.668.0522   tsuan@wickenburgaz.org</p> <hr/> <p>August 2, 2021 Dallas Hammit State Engineer Arizona Department of Transportation 206 S 17th Ave MD 102A Phoenix, AZ 85007 RE: I-11 Final Tier 1 Environmental Impact Comment— Wickenburg, AZ</p> <p>Dear Mr. Hammit,</p> <p>The Wickenburg Mayor's I-11 Task Force met on May 30, 2019 to consider the different alternatives proposed by ADOT in the Draft Tier 1 Environmental Impact Statement and Preliminary Section 4(f) Evaluation. The Task Force unanimously agreed that these alignments are not in the best interest of the Town of Wickenburg. As a result, they recommended to the Town Council that a new, preferred alternative be considered to ensure the best possible outcome for the Town of Wickenburg in regards to visibility, future economic development, ease of annexation, extension of public utilities and mitigation of sound pollution.</p> <p>On June 17, 2019, the Wickenburg Town Council deliberated and adopted Resolution No. 2229: a Resolution of the Common Council of the Town of Wickenburg, Arizona, Authorizing Official Support of a Preferred Alignment of Interstate 11. This resolution states:</p> <p>The Town of Wickenburg supports a preferred Interstate 11 alternative that connects at US60 at mile post 102 just West of Black Mountain that would connect near mile post 186 on SR93, as illustrated in exhibit A (attached). Please note that once the alignment connects at US60 the Town supports pushing the roadway towards the west to avoid sound/sight concerns with our residents and surrounding community members.</p> <p>The Town of Wickenburg kindly requests that this preferred Interstate 11 alternative be considered in future studies, assessments and analyses. Furthermore, the Town kindly requests that its desires be advocated for in regards to Interstate 11 in the general Wickenburg area.</p> <p>Thank you in advance for your attention to this important issue. Please do not hesitate to contact me if you have any questions or concerns.</p> <p>Sincerely, Vince Lorefice Town Manager</p> <hr/> <p>A RESOLUTION OF THE COMMON COUNCIL OF THE TOWN OF WICKENBURG, ARIZONA, AUTHORIZING OFFICIAL SUPPORT OF A PREFERRED ALIGNMENT OF INTERSTATE 11</p> <p>WHEREAS, the Town of Wickenburg and the Arizona Department of Transportation have enjoyed a long and productive relationship in providing excellent public facilities for the benefit of Arizona residents; and</p> <p>WHEREAS, the United States Interstate 11 is located in the Northwest District of the Arizona Department of Transportation, which also includes the Town of Wickenburg; and</p> <p>WHEREAS, the final alignment of Interstate 11 is yet to be determined; and</p> <p>WHEREAS, the Town Council, on May 1, 2017, adopted a resolution supporting the I— 11 Design Report from the Sonoran Institute; and</p> <p>WHEREAS, in December, 2017, the Arizona Department of Transportation released its Alternatives Selection Report detailing different alignments of the proposed Interstate 11 to be located west of the Wickenburg Town Limits; and</p> <p>WHEREAS, the Mayor's I—11 Task Force convened on May 30, 2019 to consider the different alternatives and recommend a preferred alternative to the Wickenburg Town Council; and ,</p> <p>WHEREAS, the Mayor's I-11 Task Force desires to ensure best possible outcomes for the Town of Wickenburg in regards to visibility, future economic development, ease of annexation, extension of public utilities, mitigation of sound pollution; and</p> <p>WHEREAS, the Mayor's I—11 Task Force recommended a preferred alternative that connects at US-60 at mile post 103.5 just East of Black Mountain that would connect near mile post 186 on SR-93, as illustrated in exhibit A (attached). Please note that once the alignment connects at US—60 the Town supports pushing the roadway towards the west to avoid sound/sight concerns with our residents and surrounding community members, as generally illustrated in exhibit A.</p> <p>NOW, THEREFORE, BE IT RESOLVED BY THE MAYOR AND COMMON COUNCIL OF THE TOWN OF WICKENBURG, ARIZONA, AS FOLLOWS:</p> <p>SECTION 1. The Town of Wickenburg supports a preferred Interstate 11 alternative that intersection US—60 at mile post 102 and connects to SR—93 near mile post 186, as illustrated in exhibit A.</p> <p>SECTION 2. This resolution should be forwarded to all appropriate Federal, State and Local governmental and non-governmental agencies actively engaged in the Interstate 11 project.</p> <p>SECTION 3. The various Town officers and employees are authorized and directed to perform all acts necessary or desirable to give effect to this resolution.</p> <p>PASSED AND ADOPTED BY THE COMMON COUNCIL OF THE TOWN OF WICKENBURG, ARIZONA THIS 17th DAY OF JUNE 2019.</p> <p>APPROVED this 17th day of June 2019 Rui Pereira, Mayor [Signatures, Certification, and Map included with attachment.]</p>			
Marriotti	AC	Town of Sahuarita	<p>Good morning,</p> <p>Please see attached letter. This letter provides the Town's position on the Interstate 11 Final Tier 1 EIS.</p> <p>A hard copy of the letter is also being sent to your office.</p> <hr/> <p>This letter is being submitted to provide ADOT with the Town's position on the Interstate 11 Final Tier 1 Environmental Impact Statement (EIS) as part of the EIS public review and comment period. The Sahuarita Town Council held a special meeting on August 10, 2021 to hear from the public and provide feedback on the EIS. The meeting was well attended—standing room only—by residents, many who have lived in the Town for decades.</p> <p>The Town submitted a letter to ADOT on July 3, 2019 to provide a public record and feedback as part of the Draft Tier 1 EIS public review and comment process. The letter expressed concerns about community impacts, neighborhood continuity, and the rural, desert feel of the community, especially as it pertained to the west alternative under consideration.</p>	email	Marriotti_Sahuarita_1374	1374

Last Name	First Name	Organization	Submission	Method	Attachment	Tracking ID
			In the Final Tier 1 EIS, the west preferred alternative connects to Interstate 19 in Sahuarita further north than what was reflected in the Draft Tier 1 EIS. Although this new western alignment is an improvement, it does not adequately alleviate the Town's concerns conveyed earlier. Public sentiment expressed during the aforementioned meeting was clear. Those attending were unified in their opposition to the proposed west alternative. Moreover, the Town Council Members unanimously voted (4-0) to express that the Town Council is "strongly opposed" to the proposed west alternative.			
Marriotti	A.C.	Town of Sahuarita	<p>Interstate 11 Tier 1 EIS Study Team c/o ADOT Communications 1655 W. Jackson Street, Mail Drop 126F Phoenix, Arizona 85007</p> <p>This letter is being submitted to provide ADOT with the Town's position on the Interstate 11 Final Tier 1 Environmental Impact Statement (EIS) as part of the EIS public review and comment period. The Sahuarita Town Council held a special meeting on August 10, 2021to hear from the public and provide feedback on the EIS. The meeting was well attended-standing room only-by residents, many who have lived in the Town for decades.</p> <p>The Town submitted a letter to ADOT on July 3, 2019 to provide a public record and feedback as part of the Draft Tier 1 EIS public review and comment process. The letter expressed concerns about community impacts, neighborhood continuity, and the rural, desert feel of the community, especially as it pertained to the west alternative under consideration.</p> <p>In the Final Tier 1 EIS, the west preferred alternative connects to Interstate 19 in Sahuarita further north than what was reflected in the Draft Tier 1 EIS. Although this new western alignment is an improvement, it does not adequately alleviate the Town's concerns conveyed earlier. Public sentiment expressed during the aforementioned meeting was clear. Those attending were unified in their opposition to the proposed west alternative. Moreover, the Town Council Members unanimously voted (4-0) to express that the Town Council is ""strongly opposed"" to the proposed west alternative.</p> <p>Respectfully submitted, A.C. Marriotti Interim Town Manager Phone: (520) 822-8816 Email: amarriotti@SahuaritaAZ.gov</p>	mail	Marriotti_Sahuarita_2593	2593
Ortega	Michael	City of Tucson	<p>Please see the following email correspondence and attachment.</p> <p>Thank you, Andrea Mejia-Flores Management Assistant to: Michael J. Ortega, P.E. - City Manager Liana Perez – Deputy City Manager City Manager's Office City of Tucson 255 W. Alameda Tucson, AZ 85726-7210</p> <hr/> <p>Corridor Dear Ms. Petty,</p> <p>Thank you for the opportunity for the City of Tucson (City) to review and comment on the Final Tier 1 Environmental Impact Statement and Preliminary 4(f) Evaluation for the Interstate 11 Corridor (Final Tier 1 E18). The City of Tucson would like to request a 90-day extension to the public review period to allow for additional community input on the Final Tier 1 EIS for the Interstate 11 (LI 1) Corridor. City of Tucson Mayor Regina Romero will also be sending a letter in support of this 90-day extension.</p> <p>The Final Tier 1 EIS Preferred Corridor Alternative carries forward both a "West Option" and an "East Option" through Pirna County. The City previously expressed strong opposition to the Draft Tier 1 EIS Green Alternative, which is similar to the "West Option" represented in the Final Tier 1 E18. On June 18, 2019, Tucson's Mayor and Council passed Resolution #23 051 strongly opposing the Draft Tier 1 E18 Green Alternative, which was included as an attachment in the letter dated July 1, 2019.</p> <p>The City continues its strong opposition to any I-11 alignment that travels through Avra Valley, such as the "West Option". On August 10, 2021, Mayor and Council unanimously passed Resolution #23386 reaffirming its strong opposition to the currently proposed "West Option" alignment of I-11, that would have the effect of bypassing the existing Interstate 10. Please find attached a copy of this resolution for inclusion in your Final Tier 1 EIS comments.</p> <p>Tucson's Mayor and City Council declared a Climate Emergency in September 2020 which prioritizes low-carbon transportation options and infrastructure investments. To that end, City of Tucson Mayor Romero, along with other Arizona mayors, recently expressed support for intercity passenger rail service that could meet much of the transportation demand currently utilizing I-IO. Additionally, Arizona, and in particular Tucson, is a hub for research and innovation related to self-driving cars and trucks. Tucson recently helped facilitate the expansion of TuSimple and believes these emerging technologies will improve traffic flow and safety on major highways. These factors point to a decreased need for the I-11 highway project, especially as a facility separate from the existing 1-10 alignment through Tucson.</p> <p>ADOT and regional planning organizations should continue to monitor these trends to ensure that this costly project is cost effective.</p> <p>According to ADOT's long-range transportation plan for 2040, there is a \$30.5 billion funding shortfall. The City's concern is that a new 50-mile section of interstate highway through Avra Valley will cost billions of dollars, taking away funding for maintenance and upgrades to the existing 1-10 and I-19 corridors and other critical mobility enhancements within our region. The City of Tucson asks that ADOT invest in the existing facilities before building new stretches of interstate. As noted in previous comments, the "West Option" does not meet the Purpose and Need of the E18:</p> <p>0 In Population and Employment Growth, please note that connections to Marana and Sahuarita do not constitute connections to the Tucson metropolitan area which is growing at a pace not reflected in the inaccurate population projections provided by the Pima Association of Governments (PAG) for this study. Most of the future population growth is projected to occur in the Tucson urban area based on recent projection models.</p> <p>0 In System Linkages and Regional Mobility and Access to Economic Activity Centers, please note that this alignment bypasses the largest economic driver in Southern Arizona, the City of Tucson. The City requests that ADOT conduct a comprehensive Economic Impacts Analysis to estimate the financial impacts to the Tucson area when tourists and other motorists from Mexico bypass Tucson if this project moves forward. The stated purpose of supporting improved regional mobility for people, goods, and homeland security is specifically missing, and connections must be made to the City of Tucson, or this goal is not met.</p> <p>As mentioned in previous comments, the economic impact to the City of Tucson of the "West Option" is extreme:</p> <p>- This option would clearly draw economic activity away from the core business and industrial areas of Tucson, not only downtown, but also industrial parks around the airport, UA Tech Parks and the Port of Tucson and negates our infrastructure investment in the region.</p> <p>Developments such as the Port of Tucson, that are just beginning to build out as logistics and transportation hubs, will not readily benefit from a western alignment that completely bypasses this area.</p>	email	Ortega_Tucson_1856	1856

Last Name	First Name	Organization	Submission	Method	Attachment	Tracking ID
			<p>The recent momentum of the business and industrial development in the core of Tucson will erode with the construction along the recommended alignment, causing competing sites to draw economic activity away from areas just now working to establish themselves.</p> <p>The costs of bringing infrastructure to the proposed alignment will make it difficult to achieve successes in a timely manner, delaying Arizona's ability to deliver a freeway solution that begins moving goods and services in a fast, efficient manner which is in every jurisdiction's best interest.</p> <p>Also mentioned in previous comments, there are critical impacts to biological, water storage, 4(f), and cultural resources that require more in-depth study.</p> <p>The mitigation of impacts of the "West Option" to the main source of Tucson's regional water supplies has not been fully explored. This alternative severely impacts the Central and Southern Avra Valley Storage and Recovery Projects (CAVSARP/SAVSARP) facilities, which are the main water sources of the Tucson Active Management Area (AMA) and store water for the City of Phoenix, the Southern Nevada Water Authority, and the Arizona Water Banking Authority (AWBA). Further, the aquifer supported by CAVSARP and SAVSARP has yet to experience water quality impacts from the commercial, industrial, and transportation uses that would inevitably be associated with a major interstate highway through Avra Valley. This is a critical concern for Tucson, as we have lost access to about 20% of our potable water production capacity over the past 10 years due to aquifer contamination from per- and polyfluoroalkyl substances (PFAS) and other chemicals of concern.</p> <p>The "West Option" will also impact wildlife migratory movements, sever existing habitats and territories, and affect natural areas and regional park viewsheds. The mitigation of these economic and environmental impacts has not been fully explored.</p> <p>As noted previously, the "West Option" negatively impacts the following list of areas that should be avoided with any alignment:</p> <p>National parks and monuments: The alignment is adjacent and through the viewsheds of the Ironwood Forest and National Monument and the Saguaro National Park.</p> <p>Wilderness areas: Most of the alignment is in natural desert that is currently wilderness.</p> <p>Roadless areas: Most of the alignment is in natural desert that is currently mostly roadless.</p> <p>Critical habitats: Much of the alignment is adjacent to and at least partly through critical habitat for birds and several varieties of important cactus. The environmental document admits the west alignment will increase mortality of Species of Economic and Recreational Importance.</p> <p>Section 4(f) properties: The alignment travels through Anza Park and the Bureau of Reclamation wildlife travel corridor.</p> <p>Tribal lands: The alignment is adjacent to and appears to infringe on the Tohono O'odham Nation land.</p> <p>100-year floodplains/floodways: The alignment appears to cross several floodplains, but more importantly, negatively impacts the CAVSARP/SAVSARP.</p> <p>Based on the concerns listed above, the City will not support the "West Option" as the preferred alignment.</p>			



## COUNTY ADMINISTRATOR'S OFFICE

PIMA COUNTY GOVERNMENTAL CENTER  
115 N. CHURCH AVE., 2<sup>nd</sup> FLOOR, Suite 231, TUCSON, AZ 85701-1317  
520-724-8661, FAX 520-724-8171

C.H. HUCKELBERRY  
County Administrator

August 16, 2021

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

***Email to: I11Study@azdot.gov***

**Re: Interstate 11 Corridor Final Tier 1 Environmental Impact Statement Review and Comments by Pima County**

Dear I-11 Tier 1 EIS Study Team:

Pima County appreciates the opportunity to provide comments on the Federal Highway Administration (FHWA) and the Arizona Department of Transportation (ADOT) Interstate 11 Corridor Tier 1 Final Environmental Impact Statement (FEIS).

We very much appreciate the agencies' consideration of the supplemental information regarding Pima County 4(f) properties that we submitted on December 6, 2019. We are very pleased the agencies have agreed to consider 9 of the 15 parks, recreation areas, and wildlife refuges that were submitted for consideration under Section 4(f), which are listed in Section 4.5.1.2 of the FEIS. We look forward to further consultation with FHWA and ADOT during Tier 2 studies regarding these properties as well as additional discussion regarding the reasons for omitting the other six properties from consideration.

We also want to thank FHWA and ADOT for acknowledging Pima County's role in the management of the Tucson Mitigation Corridor (TMC) and the fact that "any development other than wildlife habitat improvements require agreement by Reclamation, Arizona Game and Fish Department, the U.S. Fish and Wildlife Service, and Pima County." (FEIS Appendix H3, Response ID No. PA-11-4.) Should Tier 2 studies include the west option of the preferred alternative, we look forward to coordinating with FHWA and ADOT on those studies for the TMC, along with the other managing agencies.

As you are aware, the Pima County Board of Supervisors in 2007 passed a resolution in opposition to "any new highways" that would effectively bypass Interstate 10, due to impacts that "could not be adequately mitigated". This resolution, however, supported continuation of studies to bring forth the "full costs of mitigation measures".

Mr. I-11 Tier 1 EIS Study Team

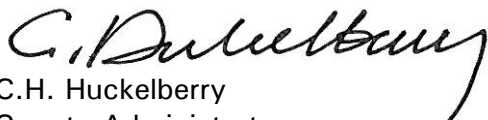
Re: **Interstate 11 Corridor Final Tier 1 Environmental Impact Statement Review and Comments by Pima County**

August 16, 2021

Page 2

The Pima County Board of Supervisors today passed a new resolution in opposition to the West Option of the Preferred Alternative due in part to the belief that impacts to the East Option (I-10 corridor) can in fact be mitigated (Attachment 1). This position and additional written comments are provided as Attachment 2 to this letter for the agencies' consideration as they move forward on the Tier 2 studies and draft environmental impact statement.

Sincerely,



C.H. Huckelberry  
County Administrator

Attachments

c: The Honorable and Chairman and Members, Pima County Board of Supervisors  
Carmine DeBonis, Jr., Deputy County Administrator for Public Works  
Ana Olivares, Director for Transportation Department

# ATTACHMENT 1



**RESOLUTION NO. 2021 - \_\_**

**RESOLUTION OF THE PIMA COUNTY BOARD OF  
SUPERVISORS IN OPPOSITION TO CONSTRUCTION OF  
THE WESTERN OPTION OF AN INTERSTATE 11  
HIGHWAY PROPOSAL THAT BYPASSES TUCSON AND  
TRAVERSES PRISTINE AND INVALUABLE SONORAN  
DESERT AREAS**

WHEREAS, Pima County in 2007 unanimously adopted a Resolution opposed to the construction of any highway that bypasses Tucson and traverses pristine and invaluable Sonoran Desert areas; and

WHEREAS, Pima County's national award winning landmark Sonoran Desert Conservation Plan and associated Multi-Species Habitat Conservation Plan identifies 44 rare local species of concern, whose areas of habitat and corridors between habitat areas are already under severe threat from development; and

WHEREAS, Pima County in 2017 adopted a Resolution to further Pima County's commitments to climate protection; and

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

WHEREAS, since 1974 Pima County has brought more than 98,000 acres of land and assumed grazing leases on more than 141,000 acres for open space and wildlife habitat preservation, and to mitigate impacts from development; and

WHEREAS, Pima County updated its Floodplain Management Ordinance in 2010 to avoid and minimize impacts to riparian vegetation along local washes; and

WHEREAS, Pima County adopted an updated county-wide Floodplain Management Plan in 2020 that creates a roadmap to guide the community through a number of steps to evaluate flood hazards, assess exposure to damage, and consider alternatives to address these issues; and

WHEREAS, Pima County is conducting the Brawley Wash Watershed Plan/Environmental Assessment (Plan/EA) to develop and study potential alternatives in creating a long-term plan to reduce flooding and erosion in the Brawley Wash watershed with a strong environmental resource focus; and

WHEREAS, the Federal Highway Administration and the Arizona Department of Transportation (ADOT) have published the Interstate 11 Final Tier 1 Environmental Impact Statement (EIS) and Preliminary Section 4(f); and

WHEREAS, the EIS has advanced to the point of identifying two alternatives for the Preferred Alternative in Pima County; and

WHEREAS, the “West Option” Preferred Alternative through Avra Valley would degrade the Sonoran Desert, sever wildlife corridors identified by the ADOT sponsored “Arizona Wildlife Linkages Assessment,” impede washes and sheet-flooding flow ways, promote sprawl by opening new areas to intense residential and commercial development far from existing urban centers, thus encouraging more car and truck travel at a time when climate change and air pollution are growing concerns; and

WHEREAS, the Bureau of Reclamation’s Tucson Mitigation Corridor (TMC) is a wildlife mitigation property established in 1990 to provide for wildlife movement across the Central Arizona Project (CAP) aqueduct; and

WHEREAS, the Avra Valley alternative is not consistent with the TMC Cooperative Agreement and Master Management Plan and would defeat the initial purpose of the TMC’s acquisition as identified in 16 USC 663(d); and

WHEREAS, the West alternative through Avra Valley negatively impacts Tucson Mountain Park, Saguaro National Park, Ironwood Forest National Monument, Bureau of Reclamation’s Central Arizona Project Canal Mitigation Corridor, and important elements of the County’s Sonoran Desert Conservation Plan by slicing through sensitive areas, severing wildlife movement corridors and linkages between important habitat areas, and disturbing an unknown number of archaeological sites; and

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

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

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

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

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

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

Opposes the construction of the Preferred Alternative – West Option in Pima County that has the stated purpose of bypassing the existing Interstate 10 because ADOT erroneously believed that the environmental, historic, archaeological, and urban form impacts could not be adequately mitigated.

**PASSED AND ADOPTED** by the Board of Supervisors, Pima County, Arizona, this \_\_\_\_ day of August, 2021.

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Sharon Bronson  
Chair, Pima County Board of Supervisors

ATTEST:

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Julie Castañeda  
Clerk of the Board

APPROVED AS TO FORM:



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Lesley M. Lukach  
Deputy County Attorney

# ATTACHMENT 2

**Pima County Comments**  
**Interstate 11 Corridor Final Tier 1 Environmental Impact Statement**  
**August 10, 2021**

**AGENCIES' RESPONSES TO DRAFT EIS COMMENTS**

Response ID PA-11-9

In our comments on the Draft Environmental Impact Statement (DEIS), Pima County noted that the agencies' assumption that impacts to historic 4(f) properties in downtown Tucson are immitigable is incorrect and contrary to federal law. FHWA and ADOT failed to respond to this comment, providing only a global comment that says, "detailed environmental and engineering studies will be done in Tier 2." The FEIS repeats this assumption twice – first on page 6-1 ("[Option D] avoids immitigable impacts to communities as well as historic districts and structures (Section 4(f) resources in downtown Tucson).") and again on page 6-20 ("the east option through Tucson would result in immitigable Section 4(f) impacts."). The FEIS should explain and substantiate why these impacts are "immitigable" or remove these references to "immitigable" impacts to historic properties in downtown Tucson from the FEIS prior to executing the Record of Decision.

Response ID PA-11-11

In our DEIS comments Pima County noted that the TMC is federally-mandated, legally-binding mitigation for the Central Arizona Project (CAP) and that proposing to use it for another federal project despite its current status as legally-binding mitigation would undermine public trust in FHWA and ADOT's mitigation commitments moving forward. The response that "All mitigation identified in the Record of Decision is legally binding" does not address the core issue raised here and does not alleviate the County's concerns. The agencies continue to propose that I-11 be routed through TMC regardless of the fact that the TMC is legally binding mitigation for another federal agency and project, and has yet to address this significant contradiction in a way that will reassure the public that FHWA and ADOT take federally mandated, legally-binding mitigation seriously. At a minimum, the agencies need to directly address this issue and explain to the public why they can use legally-binding mitigation that was set aside for another federal project and at the same time ensure that mitigation for this project will not be similarly compromised in the future.

Response ID 5

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### **Section 4-5-1-1 Properties Preliminarily Determined Not Protected by Section 4(f)**

Pima County shares the concern of the state and federal agencies that that the following parks and/or wildlife refuges have been incorrectly precluded from Section 4(f) protection. We discuss our concerns in more detail below.

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The mere presence of private property within the TMWA does not preclude the agencies from designating the publicly-owned areas of the TMWA as a 4(f) refuge. The non-private portions of the TMWA are in fact a wildlife refuge as defined for the purposes of 4(f). The agencies were provided with copious information on the history of the TMWA in AGFD's 2017 letter, and the Bureau of Reclamation (BOR) provided supporting info discussing the importance gene flow to the TMC in their 2018 comments. These comments have yet to be addressed by FHWA and ADOT, nor have the agencies provided any explanation for their cursory dismissal of this information.

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The rejection of the publicly owned lands within the TMWA as a 4(f) refuge severely limits the scope of the Tier 2 analysis, leading to the omission of any analysis regarding the state highway's diminishment of the value of wildlife habitat in these areas. Visual and wilderness impacts alone are insufficient to address indirect impacts to recreation that is based on wildlife viewing. Indirect impacts to recreation in TMP will also occur as a result of impairments due to blighted soundscapes, traffic and changes in physical access to trails and parking areas. Users will tend to choose less heavily trafficked areas for recreation, increasing the use on areas more distant from a freeway potentially introducing further negative impacts to wildlife.

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The agencies should defer to the AGFD on this issue and designate the publicly-owned areas of the TMWA as a 4(f) property. At a minimum, the agencies must provide a meaningful explanation for why the presence of private property precludes the publicly-owned property within the TMWA from being considered a 4(f) property, as required by NEPA regulations.

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The rejection of IFNM as a significant recreation destination is inconsistent with the comments submitted by BLM dated July 9, 2019. It stated, “it is incorrect to state that these national monuments do not function as or [are] designated as a “significant recreation area”” given the IFNM RMP at Line 26.” And as the BLM pointed out in their comments dated January 2, 2020, FHWA and ADOT’s treatment of the Vulture Mountains area is inconsistent with the treatment of IFNM.

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#### Section 4.5.2 Historic Sites

The following historic site qualifies for protection under Section 4(f) and must be evaluated as such as the agencies move forward in the I-11 planning process.

*Tucson Mountain Park Historic District:* The Tucson Mountain Park Historic District was listed on the National Register of Historic Places (NHRP) on July 8, 2021. The District includes all of the original (1932) park, currently consisting of a large portion of the County managed Tucson Mountain Park property, and almost all of Saguaro National Park West managed by the National Park Service. The Historic District was listed as a Historic Park Landscape based on its association with the Civilian Conservation Corps, and was determined to meet Criteria A and C. This property therefore meets the criteria as an historic property subject to 4(f) evaluation.

#### **FEIS CHAPTER 6 – PREFERRED ALTERNATIVE**

- Alignment C was eliminated from consideration, but the chapter does not state the basis for the decision. The FEIS must explain the basis for agency decisions.



## **OTHER PARTICIPATING AGENCY COMMENTS**

### **Tumamoc Globeberry and Pima Pineapple Cactus**

We concur with the US Fish and Wildlife Service (USFWS) that the Pima pineapple cactus be included in surveys and field studies in suitable habitat in all of the corridor options prior to Tier 2 and that globeberry assessment and mitigation strategies be developed for the C and D corridor options. Take of both species due to activities of Pima County and the Regional Flood Control District, as well as some private development permitted by Pima County, is covered by the County's Multi-Species Conservation Plan and Section 10(a)(1)(B) Incidental Take Permit issued under the Endangered Species Act. The Pima pineapple cactus is found primarily in the portions of Pima County that are traversed by the west option. The biological opinion for our Section 10(a)(1)(b) permit would likely have to be revised if the west route is chosen, due to its additional impacts on the species. A jeopardy ruling on further take of Pima pineapple cactus is not out of the question, particularly in light of the fact that mitigation cannot be exacted for impacts to this species under Section 404 of the Clean Water Act in Avra and Altar Valleys.

### **Wetland and Floodplain Avoidance**

No explanation given to why neither alternative avoids the wetland upstream of Sasco Road. These are the biggest wetlands on the Santa Cruz River system downstream of Tubac. The floods here spread out over a large area and reduce their velocity, dropping nutrient-rich sediments that support cattail wetlands, floodplain grasslands, Goodding's willow forests, and mesquite bosques. The flood storage capacity of the area should not be reduced, nor the wetlands diminished by encroachment or channelization.

## **GENERAL COMMENTS**

### **Changed Circumstances since Draft Tier 1 EIS**

Despite use of an updated (2018) travel-demand model for this EIS, many economic, technological and environmental changes have occurred since the Draft Tier 1 EIS. The most recent model predates remarkable changes that occurred during the 2020 pandemic and subsequent socio-economic shifts, including important and potentially fundamental changes in the way Americans conduct their labor, choose their place of living and make their capital investments. Likewise, supply chains and logistics technologies are rapidly evolving in ways that may accelerate the needs, or require different modes of transport. Coupled with that, and entirely unrecognized in this EIS is the emerging systemic shortages of water derived from the Colorado River. This seems likely to affect the land cover and land use of much of the study area in ways that are not entirely foreseeable. And finally, fundamental changes in the way the federal government interprets the Clean Water Act and other laws in Arizona were made since the EIS was finalized. This last change affects not only the jurisdiction of the U. S. Army Corps of Engineers, but also the state's authority to regulate water pollution, and the federal government's ability to exact mitigation for impacts to federally listed species and cultural resources.

It is too early to discern the durability or significance of any of these changes, but decision-makers will be wise to consider these and other transformative events when funding new projects and the Tier 2 studies that may reference this EIS. Likewise, the purpose and need for I-11-related projects will need to be reconsidered. It may be that there are better ways to address regional mobility and economic development in light of these and other changes.

### Recommended Alternative and Preferred Alternative

The nomenclature “Recommended” and “Preferred” is confusing. While the Introduction and Readers Guide provides a cursory explanation of these terms and the difference between the two, in light of the fact that “recommended” and “preferred” are literal synonyms the average reader is likely to be confused at their repeated and seemingly interchangeable use throughout the FEIS. The National Environmental Policy Act (NEPA) implementing regulations state, “Environmental impact statements shall be written in plain language and may use appropriate graphics so that decision makers and the public can readily understand them.” We recommend that the agencies use clearer nomenclature moving forward to better distinguish the different alternatives under consideration; ideally the agencies would use different terms for the different alternatives to clearly delineate them for the reader.



## COUNTY ADMINISTRATOR'S OFFICE

PIMA COUNTY GOVERNMENTAL CENTER  
115 N. CHURCH AVE., 2<sup>nd</sup> FLOOR, Suite 231, TUCSON, AZ 85701-1317  
520-724-8661, FAX 520-724-8171

**C.H. HUCKELBERRY**  
County Administrator

August 16, 2021

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

**Email to: [I11Study@azdot.gov](mailto:I11Study@azdot.gov)**

**Re: Interstate 11 Corridor Final Tier 1 Environmental Impact Statement Review and Comments by Pima County**

Dear I-11 Tier 1 EIS Study Team:

Pima County appreciates the opportunity to provide comments on the Federal Highway Administration (FHWA) and the Arizona Department of Transportation (ADOT) Interstate 11 Corridor Tier 1 Final Environmental Impact Statement (FEIS).

We very much appreciate the agencies' consideration of the supplemental information regarding Pima County 4(f) properties that we submitted on December 6, 2019. We are very pleased the agencies have agreed to consider 9 of the 15 parks, recreation areas, and wildlife refuges that were submitted for consideration under Section 4(f), which are listed in Section 4.5.1.2 of the FEIS. We look forward to further consultation with FHWA and ADOT during Tier 2 studies regarding these properties as well as additional discussion regarding the reasons for omitting the other six properties from consideration.

We also want to thank FHWA and ADOT for acknowledging Pima County's role in the management of the Tucson Mitigation Corridor (TMC) and the fact that "any development other than wildlife habitat improvements require agreement by Reclamation, Arizona Game and Fish Department, the U.S. Fish and Wildlife Service, and Pima County." (FEIS Appendix H3, Response ID No. PA-11-4.) Should Tier 2 studies include the west option of the preferred alternative, we look forward to coordinating with FHWA and ADOT on those studies for the TMC, along with the other managing agencies.

As you are aware, the Pima County Board of Supervisors in 2007 passed a resolution in opposition to "any new highways" that would effectively bypass Interstate 10, due to impacts that "could not be adequately mitigated". This resolution, however, supported continuation of studies to bring forth the "full costs of mitigation measures".

Mr. I-11 Tier 1 EIS Study Team

Re: **Interstate 11 Corridor Final Tier 1 Environmental Impact Statement Review and Comments by Pima County**

August 16, 2021

Page 2

The Pima County Board of Supervisors today passed a new resolution in opposition to the West Option of the Preferred Alternative due in part to the belief that impacts to the East Option (I-10 corridor) can in fact be mitigated (Attachment 1). This position and additional written comments are provided as Attachment 2 to this letter for the agencies' consideration as they move forward on the Tier 2 studies and draft environmental impact statement.

Sincerely,



C.H. Huckelberry  
County Administrator

**Attachments**

- c:     The Honorable and Chairman and Members, Pima County Board of Supervisors  
        Carmine DeBonis, Jr., Deputy County Administrator for Public Works  
        Ana Olivares, Director for Transportation Department

# ATTACHMENT 1

**RESOLUTION NO. 2021 - \_\_**

**RESOLUTION OF THE PIMA COUNTY BOARD OF  
SUPERVISORS IN OPPOSITION TO CONSTRUCTION OF  
THE WESTERN OPTION OF AN INTERSTATE 11  
HIGHWAY PROPOSAL THAT BYPASSES TUCSON AND  
TRAVERSES PRISTINE AND INVALUABLE SONORAN  
DESERT AREAS**

WHEREAS, Pima County in 2007 unanimously adopted a Resolution opposed to the construction of any highway that bypasses Tucson and traverses pristine and invaluable Sonoran Desert areas; and

WHEREAS, Pima County's national award winning landmark Sonoran Desert Conservation Plan and associated Multi-Species Habitat Conservation Plan identifies 44 rare local species of concern, whose areas of habitat and corridors between habitat areas are already under severe threat from development; and

WHEREAS, Pima County in 2017 adopted a Resolution to further Pima County's commitments to climate protection; and

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

WHEREAS, since 1974 Pima County has brought more than 98,000 acres of land and assumed grazing leases on more than 141,000 acres for open space and wildlife habitat preservation, and to mitigate impacts from development; and

WHEREAS, Pima County updated its Floodplain Management Ordinance in 2010 to avoid and minimize impacts to riparian vegetation along local washes; and

WHEREAS, Pima County adopted an updated county-wide Floodplain Management Plan in 2020 that creates a roadmap to guide the community through a number of steps to evaluate flood hazards, assess exposure to damage, and consider alternatives to address these issues; and

WHEREAS, Pima County is conducting the Brawley Wash Watershed Plan/Environmental Assessment (Plan/EA) to develop and study potential alternatives in creating a long-term plan to reduce flooding and erosion in the Brawley Wash watershed with a strong environmental resource focus; and

WHEREAS, the Federal Highway Administration and the Arizona Department of Transportation (ADOT) have published the Interstate 11 Final Tier 1 Environmental Impact Statement (EIS) and Preliminary Section 4(f); and

WHEREAS, the EIS has advanced to the point of identifying two alternatives for the Preferred Alternative in Pima County; and

WHEREAS, the "West Option" Preferred Alternative through Avra Valley would degrade the Sonoran Desert, sever wildlife corridors identified by the ADOT sponsored "Arizona Wildlife Linkages Assessment," impede washes and sheet-flooding flow ways, promote sprawl by opening new areas to intense residential and commercial development far from existing urban centers, thus encouraging more car and truck travel at a time when climate change and air pollution are growing concerns; and

WHEREAS, the Bureau of Reclamation's Tucson Mitigation Corridor (TMC) is a wildlife mitigation property established in 1990 to provide for wildlife movement across the Central Arizona Project (CAP) aqueduct; and

WHEREAS, the Avra Valley alternative is not consistent with the TMC Cooperative Agreement and Master Management Plan and would defeat the initial purpose of the TMC's acquisition as identified in 16 USC 663(d); and

WHEREAS, the West alternative through Avra Valley negatively impacts Tucson Mountain Park, Saguaro National Park, Ironwood Forest National Monument, Bureau of Reclamation's Central Arizona Project Canal Mitigation Corridor, and important elements of the County's Sonoran Desert Conservation Plan by slicing through sensitive areas, severing wildlife movement corridors and linkages between important habitat areas, and disturbing an unknown number of archaeological sites; and

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

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

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

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

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

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

Opposes the construction of the Preferred Alternative – West Option in Pima County that has the stated purpose of bypassing the existing Interstate 10 because ADOT erroneously believed that the environmental, historic, archaeological, and urban form impacts could not be adequately mitigated.

**PASSED AND ADOPTED** by the Board of Supervisors, Pima County, Arizona, this \_\_\_\_ day of August, 2021.

---

Sharon Bronson  
Chair, Pima County Board of Supervisors

ATTEST:

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Julie Castañeda  
Clerk of the Board

APPROVED AS TO FORM:



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Lesley M. Lukach  
Deputy County Attorney



**Pima County Comments**  
**Interstate 11 Corridor Final Tier 1 Environmental Impact Statement**  
**August 10, 2021**

**AGENCIES' RESPONSES TO DRAFT EIS COMMENTS**

**Response ID PA-11-9**

In our comments on the Draft Environmental Impact Statement (DEIS), Pima County noted that the agencies' assumption that impacts to historic 4(f) properties in downtown Tucson are immitigable is incorrect and contrary to federal law. FHWA and ADOT failed to respond to this comment, providing only a global comment that says, "detailed environmental and engineering studies will be done in Tier 2." The FEIS repeats this assumption twice – first on page 6-1 ("[Option D] avoids immitigable impacts to communities as well as historic districts and structures (Section 4(f) resources in downtown Tucson).") and again on page 6-20 ("the east option through Tucson would result in immitigable Section 4(f) impacts."). The FEIS should explain and substantiate why these impacts are "immitigable" or remove these references to "immitigable" impacts to historic properties in downtown Tucson from the FEIS prior to executing the Record of Decision.

**Response ID PA-11-11**

In our DEIS comments Pima County noted that the TMC is federally-mandated, legally-binding mitigation for the Central Arizona Project (CAP) and that proposing to use it for another federal project despite its current status as legally-binding mitigation would undermine public trust in FHWA and ADOT's mitigation commitments moving forward. The response that "All mitigation identified in the Record of Decision is legally binding" does not address the core issue raised here and does not alleviate the County's concerns. The agencies continue to propose that I-11 be routed through TMC regardless of the fact that the TMC is legally binding mitigation for another federal agency and project, and has yet to address this significant contradiction in a way that will reassure the public that FHWA and ADOT take federally mandated, legally-binding mitigation seriously. At a minimum, the agencies need to directly address this issue and explain to the public why they can use legally-binding mitigation that was set aside for another federal project and at the same time ensure that mitigation for this project will not be similarly compromised in the future.

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#### Section 4.5.2 Historic Sites

The following historic site qualifies for protection under Section 4(f) and must be evaluated as such as the agencies move forward in the I-11 planning process.

*Tucson Mountain Park Historic District:* The Tucson Mountain Park Historic District was listed on the National Register of Historic Places (NHRP) on July 8, 2021. The District includes all of the original (1932) park, currently consisting of a large portion of the County managed Tucson Mountain Park property, and almost all of Saguaro National Park West managed by the National Park Service. The Historic District was listed as a Historic Park Landscape based on its association with the Civilian Conservation Corps, and was determined to meet Criteria A and C. This property therefore meets the criteria as an historic property subject to 4(f) evaluation.

#### **FEIS CHAPTER 6 – PREFERRED ALTERNATIVE**

- Alignment C was eliminated from consideration, but the chapter does not state the basis for the decision. The FEIS must explain the basis for agency decisions.

## **OTHER PARTICIPATING AGENCY COMMENTS**

### **Tumamoc Globeberry and Pima Pineapple Cactus**

We concur with the US Fish and Wildlife Service (USFWS) that the Pima pineapple cactus be included in surveys and field studies in suitable habitat in all of the corridor options prior to Tier 2 and that globeberry assessment and mitigation strategies be developed for the C and D corridor options. Take of both species due to activities of Pima County and the Regional Flood Control District, as well as some private development permitted by Pima County, is covered by the County's Multi-Species Conservation Plan and Section 10(a)(1)(B) Incidental Take Permit issued under the Endangered Species Act. The Pima pineapple cactus is found primarily in the portions of Pima County that are traversed by the west option. The biological opinion for our Section 10(a)(1)(b) permit would likely have to be revised if the west route is chosen, due to its additional impacts on the species. A jeopardy ruling on further take of Pima pineapple cactus is not out of the question, particularly in light of the fact that mitigation cannot be exacted for impacts to this species under Section 404 of the Clean Water Act in Avra and Altar Valleys.

### **Wetland and Floodplain Avoidance**

No explanation given to why neither alternative avoids the wetland upstream of Sasco Road. These are the biggest wetlands on the Santa Cruz River system downstream of Tubac. The floods here spread out over a large area and reduce their velocity, dropping nutrient-rich sediments that support cattail wetlands, floodplain grasslands, Goodding's willow forests, and mesquite bosques. The flood storage capacity of the area should not be reduced, nor the wetlands diminished by encroachment or channelization.

## **GENERAL COMMENTS**

### **Changed Circumstances since Draft Tier 1 EIS**

Despite use of an updated (2018) travel-demand model for this EIS, many economic, technological and environmental changes have occurred since the Draft Tier 1 EIS. The most recent model predates remarkable changes that occurred during the 2020 pandemic and subsequent socio-economic shifts, including important and potentially fundamental changes in the way Americans conduct their labor, choose their place of living and make their capital investments. Likewise, supply chains and logistics technologies are rapidly evolving in ways that may accelerate the needs, or require different modes of transport. Coupled with that, and entirely unrecognized in this EIS is the emerging systemic shortages of water derived from the Colorado River. This seems likely to affect the land cover and land use of much of the study area in ways that are not entirely foreseeable. And finally, fundamental changes in the way the federal government interprets the Clean Water Act and other laws in Arizona were made since the EIS was finalized. This last change affects not only the jurisdiction of the U. S. Army Corps of Engineers, but also the state's authority to regulate water pollution, and the federal government's ability to exact mitigation for impacts to federally listed species and cultural resources.

It is too early to discern the durability or significance of any of these changes, but decision-makers will be wise to consider these and other transformative events when funding new projects and the Tier 2 studies that may reference this EIS. Likewise, the purpose and need for I-11-related projects will need to be reconsidered. It may be that there are better ways to address regional mobility and economic development in light of these and other changes.

### Recommended Alternative and Preferred Alternative

The nomenclature “Recommended” and “Preferred” is confusing. While the Introduction and Readers Guide provides a cursory explanation of these terms and the difference between the two, in light of the fact that “recommended” and “preferred” are literal synonyms the average reader is likely to be confused at their repeated and seemingly interchangeable use throughout the FEIS. The National Environmental Policy Act (NEPA) implementing regulations state, “Environmental impact statements shall be written in plain language and may use appropriate graphics so that decision makers and the public can readily understand them.” We recommend that the agencies use clearer nomenclature moving forward to better distinguish the different alternatives under consideration; ideally the agencies would use different terms for the different alternatives to clearly delineate them for the reader.



# TOWN OF WICKENBURG

155 N. Tegner, Ste. A - Wickenburg, Arizona 85390  
(928) 684-5451 FAX (602) 506-1580

**August 2, 2021**

**Dallas Hammit**

State Engineer

Arizona Department of Transportation

206 S 17<sup>th</sup> Ave MD 102A

Phoenix, AZ 85007

**RE: I-11 Final Tier 1 Environmental Impact Comment— Wickenburg, AZ**

Dear Mr. Hammit,

The Wickenburg Mayor's I-11 Task Force met on May 30, 2019 to consider the different alternatives proposed by ADOT in the Draft Tier 1 Environmental Impact Statement and Preliminary Section 4(f) Evaluation. The Task Force unanimously agreed that these alignments are not in the best interest of the Town of Wickenburg. As a result, they recommended to the Town Council that a new, preferred alternative be considered to ensure the best possible outcome for the Town of Wickenburg in regards to visibility, future economic development, ease of annexation, extension of public utilities and mitigation of sound pollution.

On June 17, 2019, the Wickenburg Town Council deliberated and adopted **Resolution No. 2229: a Resolution of the Common Council of the Town of Wickenburg, Arizona, Authorizing Official Support of a Preferred Alignment of Interstate 11**. This resolution states:

*The Town of Wickenburg supports a preferred Interstate 11 alternative that connects at US60 at mile post 102 just West of Black Mountain that would connect near mile post 186 on SR93, as illustrated in exhibit A (attached). Please note that once the alignment connects at US60 the Town supports pushing the roadway towards the west to avoid sound/sight concerns with our residents and surrounding community members.*

The Town of Wickenburg kindly requests that this preferred Interstate 11 alternative be considered in future studies, assessments and analyses. Furthermore, the Town kindly requests that its desires be advocated for in regards to Interstate 11 in the general Wickenburg area.

Thank you in advance for your attention to this important issue. Please do not hesitate to contact me if you have any questions or concerns.

Sincerely,

**Vince Loreface**

Town Manager



**RESOLUTION NO. 2229**

**A RESOLUTION OF THE COMMON COUNCIL OF THE TOWN OF  
WICKENBURG, ARIZONA, AUTHORIZING OFFICIAL SUPPORT  
OF A PREFERRED ALIGNMENT OF INTERSTATE 11**

WHEREAS, the Town of Wickenburg and the Arizona Department of Transportation have enjoyed a long and productive relationship in providing excellent public facilities for the benefit of Arizona residents; and

WHEREAS, the United States Interstate 11 is located in the Northwest District of the Arizona Department of Transportation, which also includes the Town of Wickenburg; and

WHEREAS, the final alignment of Interstate 11 is yet to be determined; and

WHEREAS, the Town Council, on May 1, 2017, adopted a resolution supporting the I-11 Design Report from the Sonoran Institute; and

WHEREAS, in December, 2017, the Arizona Department of Transportation released its Alternatives Selection Report detailing different alignments of the proposed Interstate 11 to be located west of the Wickenburg Town Limits; and

WHEREAS, the Mayor's I-11 Task Force convened on May 30, 2019 to consider the different alternatives and recommend a preferred alternative to the Wickenburg Town Council; and

WHEREAS, the Mayor's I-11 Task Force desires to ensure best possible outcomes for the Town of Wickenburg in regards to visibility, future economic development, ease of annexation, extension of public utilities, mitigation of sound pollution; and

WHEREAS, the Mayor's I-11 Task Force recommended a preferred alternative that connects at US-60 at mile post 103.5 just East of Black Mountain that would connect near mile post 186 on SR-93, as illustrated in exhibit A (attached). Please note that once the alignment connects at US-60 the Town supports pushing the roadway towards the west to avoid sound/sight concerns with our residents and surrounding community members, as generally illustrated in exhibit A.

NOW, THEREFORE, BE IT RESOLVED BY THE MAYOR AND COMMON COUNCIL OF THE TOWN OF WICKENBURG, ARIZONA, AS FOLLOWS:



Resolution No. 2229

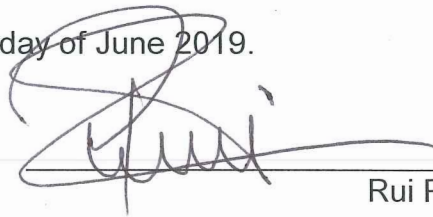
SECTION 1. The Town of Wickenburg supports a preferred Interstate 11 alternative that intersection US-60 at mile post 102 and connects to SR-93 near mile post 186, as illustrated in exhibit A.

SECTION 2. This resolution should be forwarded to all appropriate Federal, State and Local governmental and non-governmental agencies actively engaged in the Interstate 11 project.

SECTION 3. The various Town officers and employees are authorized and directed to perform all acts necessary or desirable to give effect to this resolution.

PASSED AND ADOPTED BY THE COMMON COUNCIL OF THE TOWN OF WICKENBURG, ARIZONA THIS 17<sup>th</sup> DAY OF JUNE 2019.

APPROVED this 17<sup>th</sup> day of June 2019.



Rui Pereira, Mayor

ATTEST:



Amy Brown, Town Clerk

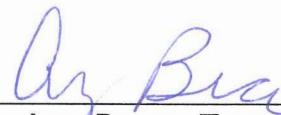
APPROVED AS TO FORM:



Trish Stuhan, Town Attorney  
Gust Rosenfeld PLC

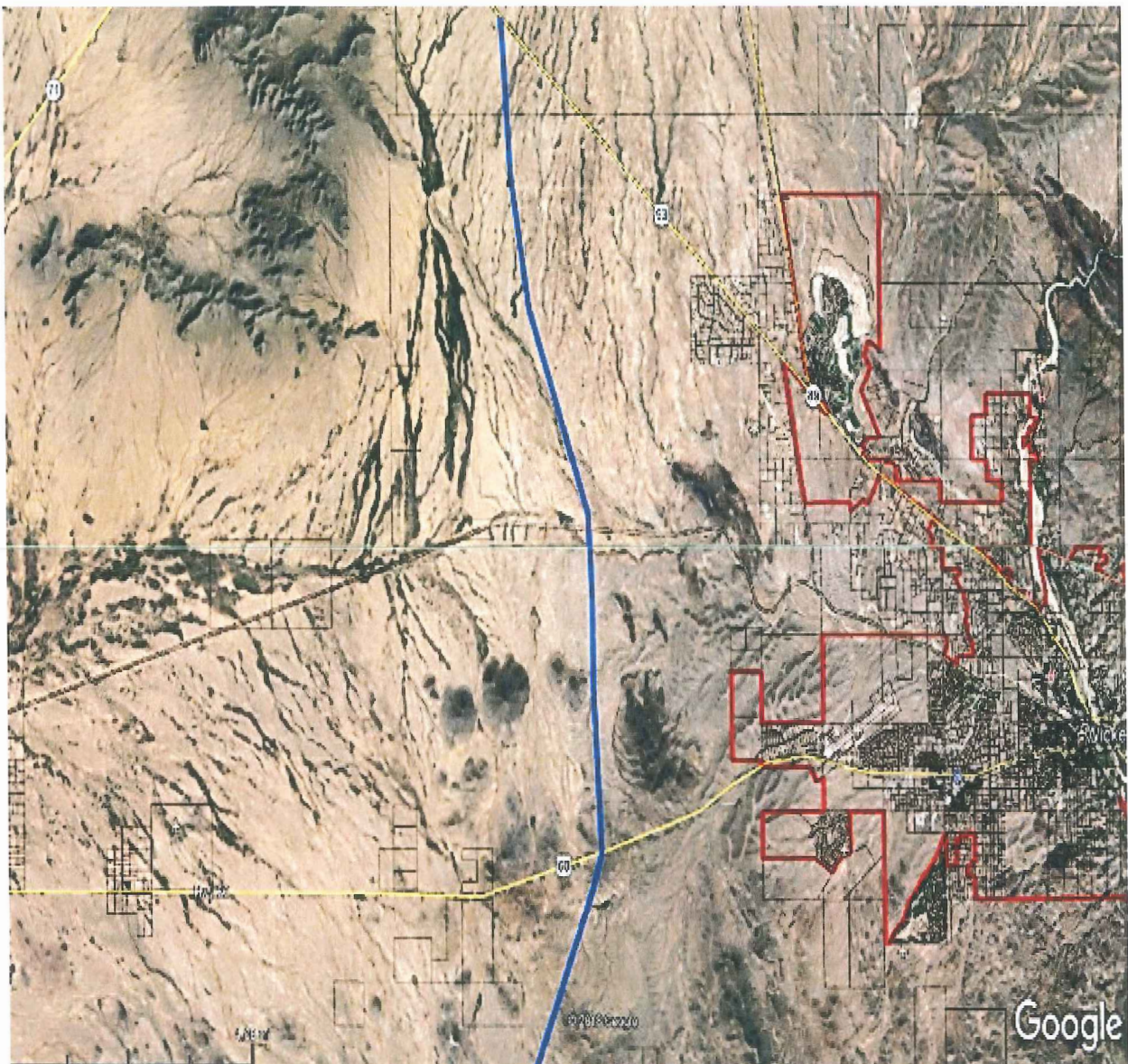
CERTIFICATION

I, Amy Brown, Town Clerk, HEREBY CERTIFY that the foregoing Resolution Number 2229 was duly passed and adopted by the Common Council of the Town of Wickenburg, Arizona, at a regular meeting held on the 17<sup>th</sup> day of June 2019, and that a quorum was present at the meeting.



Amy Brown, Town Clerk

EXHIBIT A







August 13, 2021

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

This letter is being submitted to provide ADOT with the Town's position on the Interstate 11 Final Tier 1 Environmental Impact Statement (EIS) as part of the EIS public review and comment period. The Sahuarita Town Council held a special meeting on August 10, 2021 to hear from the public and provide feedback on the EIS. The meeting was well attended—standing room only—by residents, many who have lived in the Town for decades.

The Town submitted a letter to ADOT on July 3, 2019 to provide a public record and feedback as part of the Draft Tier 1 EIS public review and comment process. The letter expressed concerns about community impacts, neighborhood continuity, and the rural, desert feel of the community, especially as it pertained to the west alternative under consideration.

In the Final Tier 1 EIS, the west preferred alternative connects to Interstate 19 in Sahuarita further north than what was reflected in the Draft Tier 1 EIS. Although this new western alignment is an improvement, it does not adequately alleviate the Town's concerns conveyed earlier. Public sentiment expressed during the aforementioned meeting was clear. Those attending were unified in their opposition to the proposed west alternative. Moreover, the Town Council Members unanimously voted (4-0) to express that the Town Council is "strongly opposed" to the proposed west alternative.

Respectfully submitted,

**A.C. Marriotti**

Digitally signed by A.C. Marriotti  
DN: cn=A.C. Marriotti, o=Town of Sahuarita, Arizona,  
ou=Finance Department,  
email=amarriotti@sahuaritaaz.gov, c=US  
Date: 2021.08.13 08:54:16 -0700

Interim Town Manager  
Phone: (520) 822-8816  
Email: [amarriotti@sahuaritaAZ.gov](mailto:amarriotti@sahuaritaAZ.gov)

August 13, 2021

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

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Respectfully submitted,

**A.C. Marriotti**

Digitally signed by A.C. Marriotti  
DN: cn=A.C. Marriotti, o=Town of Sahuarita, Arizona,  
ou=Finance Department,  
email=amarriotti@sahuaritaaz.gov, c=US  
Date: 2021.08.13 08:54:16 -07'00'

Interim Town Manager  
Phone: (520) 822-8816  
Email: [amarriotti@sahuaritaAZ.gov](mailto:amarriotti@sahuaritaAZ.gov)



CITY OF  
TUCSON

MICHAEL J. ORTEGA  
CITY MANAGER

August 16, 2021

Karla S. Petty  
Arizona Division Administrator  
Federal Highway Administration  
4000 North Central Avenue, Suite 1500  
Phoenix, Arizona 85012-3500

RE:  
Federal Aid No. 999-M(161)S  
ADOT Project No. 999 SW O M5180 O1P  
I-11 Corridor Final Tier 1 EIS

**Subject: City of Tucson Comments on Final Tier 1 Environmental Impact Statement and Preliminary 4(f) Evaluation for the Interstate 11 Corridor**

Dear Ms. Petty,

Thank you for the opportunity for the City of Tucson (City) to review and comment on the Final Tier 1 Environmental Impact Statement and Preliminary 4(f) Evaluation for the Interstate 11 Corridor (Final Tier 1 EIS). The City of Tucson would like to request a 90-day extension to the public review period to allow for additional community input on the Final Tier 1 EIS for the Interstate 11 (I-11) Corridor. City of Tucson Mayor Regina Romero will also be sending a letter in support of this 90-day extension.

The Final Tier 1 EIS Preferred Corridor Alternative carries forward both a "West Option" and an "East Option" through Pima County. The City previously expressed strong opposition to the Draft Tier 1 EIS Green Alternative, which is similar to the "West Option" represented in the Final Tier 1 EIS. On June 18, 2019, Tucson's Mayor and Council passed Resolution #23051 strongly opposing the Draft Tier 1 EIS Green Alternative, which was included as an attachment in the letter dated July 1, 2019.

The City continues its strong opposition to any I-11 alignment that travels through Avra Valley, such as the "West Option". On August 10, 2021, Mayor and Council unanimously passed Resolution #23386 reaffirming its strong opposition to the currently proposed "West Option" alignment of I-11, that would have the effect of bypassing the existing Interstate 10. Please find attached a copy of this resolution for inclusion in your Final Tier 1 EIS comments.

Tucson's Mayor and City Council declared a Climate Emergency in September 2020 which prioritizes low-carbon transportation options and infrastructure investments.

To that end, City of Tucson Mayor Romero, along with other Arizona mayors, recently expressed support for intercity passenger rail service that could meet much of the transportation demand currently utilizing I-10. Additionally, Arizona, and in particular Tucson, is a hub for research and innovation related to self-driving cars and trucks. Tucson recently helped facilitate the expansion of TuSimple and believes these emerging technologies will improve traffic flow and safety on major highways. These factors point to a decreased need for the I-11 highway project, especially as a facility separate from the existing I-10 alignment through Tucson. ADOT and regional planning organizations should continue to monitor these trends to ensure that this costly project is cost effective.

According to [ADOT's long-range transportation plan for 2040](#), there is a \$30.5 billion funding shortfall. The City's concern is that a new 50-mile section of interstate highway through Avra Valley will cost billions of dollars, taking away funding for maintenance and upgrades to the existing I-10 and I-19 corridors and other critical mobility enhancements within our region. The City of Tucson asks that ADOT invest in the existing facilities before building new stretches of interstate.

As noted in previous comments, the "West Option" does not meet the Purpose and Need of the EIS:

- In Population and Employment Growth, please note that connections to Marana and Sahuarita do not constitute connections to the Tucson metropolitan area which is growing at a pace not reflected in the inaccurate population projections provided by the Pima Association of Governments (PAG) for this study. Most of the future population growth is projected to occur in the Tucson urban area based on recent projection models.
- In System Linkages and Regional Mobility and Access to Economic Activity Centers, please note that this alignment bypasses the largest economic driver in Southern Arizona, the City of Tucson. The City requests that ADOT conduct a comprehensive Economic Impacts Analysis to estimate the financial impacts to the Tucson area when tourists and other motorists from Mexico bypass Tucson if this project moves forward. The stated purpose of supporting improved regional mobility for people, goods, and homeland security is specifically missing, and connections must be made to the City of Tucson, or this goal is not met.

As mentioned in previous comments, the economic impact to the City of Tucson of the "West Option" is extreme:

- This option would clearly draw economic activity away from the core business and industrial areas of Tucson, not only downtown, but also industrial parks around the airport, UA Tech Parks and the Port of Tucson and negates our infrastructure investment in the region.



- Developments such as the Port of Tucson, that are just beginning to build out as logistics and transportation hubs, will not readily benefit from a western alignment that completely bypasses this area.
- The recent momentum of the business and industrial development in the core of Tucson will erode with the construction along the recommended alignment, causing competing sites to draw economic activity away from areas just now working to establish themselves.
- The costs of bringing infrastructure to the proposed alignment will make it difficult to achieve successes in a timely manner, delaying Arizona's ability to deliver a freeway solution that begins moving goods and services in a fast, efficient manner which is in every jurisdiction's best interest.

Also mentioned in previous comments, there are critical impacts to biological, water storage, 4(f), and cultural resources that require more in-depth study.

- The mitigation of impacts of the “West Option” to the main source of Tucson’s regional water supplies has not been fully explored. This alternative severely impacts the Central and Southern Avra Valley Storage and Recovery Projects (CAVSARP/SAVSARP) facilities, which are the main water sources of the Tucson Active Management Area (AMA) and store water for the City of Phoenix, the Southern Nevada Water Authority, and the Arizona Water Banking Authority (AWBA). Further, the aquifer supported by CAVSARP and SAVSARP has yet to experience water quality impacts from the commercial, industrial, and transportation uses that would inevitably be associated with a major interstate highway through Avra Valley. This is a critical concern for Tucson, as we have lost access to about 20% of our potable water production capacity over the past 10 years due to aquifer contamination from per- and polyfluoroalkyl substances (PFAS) and other chemicals of concern.
- The “West Option” will also impact wildlife migratory movements, sever existing habitats and territories, and affect natural areas and regional park viewsheds. The mitigation of these economic and environmental impacts has not been fully explored.
- As noted previously, the “West Option” negatively impacts the following list of areas that should be avoided with any alignment:
  - 1) National parks and monuments: The alignment is adjacent and through the viewsheds of the Ironwood Forest and National Monument and the Saguaro National Park.
  - 2) Wilderness areas: Most of the alignment is in natural desert that is currently wilderness.

- 3) Roadless areas: Most of the alignment is in natural desert that is currently mostly roadless.
- 4) Critical habitats: Much of the alignment is adjacent to and at least partly through critical habitat for birds and several varieties of important cactus. The environmental document admits the west alignment will increase mortality of Species of Economic and Recreational Importance.
- 5) Section 4(f) properties: The alignment travels through Anza Park and the Bureau of Reclamation wildlife travel corridor.
- 6) Tribal lands: The alignment is adjacent to and appears to infringe on the Tohono O'odham Nation land.
- 7) 100-year floodplains/floodways: The alignment appears to cross several floodplains, but more importantly, negatively impacts the CAVSARP/SAVSARP.

Based on the concerns listed above, the City will not support the "West Option" as the preferred alignment.

Sincerely,

*Lionel Perez for:*

Michael J. Ortega, P.E.  
City Manager

Attachment: City of Tucson Mayor & Council Resolution #23386

ecc: Electronic copy to the following:  
 Honorable Mayor and Council Members – City of Tucson  
 I-II Tier 1 EIS Study Team [I-IIStudy@azdot.gov](mailto:I-IIStudy@azdot.gov)  
 Timothy Thomure, P.E., City Manager's Office  
[timothy.thomure@tucsonaz.gov](mailto:timothy.thomure@tucsonaz.gov)  
 Samuel Credio, P.E., City Manager's Office  
[sam.credio@tucsonaz.gov](mailto:sam.credio@tucsonaz.gov)  
 Diana Alarcon, Tucson Department of Transportation & Mobility  
[diana.alarcon@tucsonaz.gov](mailto:diana.alarcon@tucsonaz.gov)  
 Robin Raine, P.E., Tucson Department of Transportation & Mobility  
[robin.raine@tucsonaz.gov](mailto:robin.raine@tucsonaz.gov)  
 Jennifer Toothaker, Transportation Planning Administrator  
[jennifer.toothaker@tucsonaz.gov](mailto:jennifer.toothaker@tucsonaz.gov)  
 Scott Clark, Planning and Development Services Department  
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 Jodie Brown, Planning and Development Services Department  
[Jodie.brown@tucsonaz.gov](mailto:Jodie.brown@tucsonaz.gov)  
 John Kmiec, Tucson Water [john.kmiec@tucsonaz.gov](mailto:john.kmiec@tucsonaz.gov)  
 Jay Van Echo, ADOT Project Manager ([JVanEcho@azdot.gov](mailto:JVanEcho@azdot.gov))  
 Aryan Lirange, FHWA Senior Engineer ([Aryan.Lirange@dot.gov](mailto:Aryan.Lirange@dot.gov))



ADOPTED BY THE  
MAYOR AND COUNCIL

August 10, 2021

RESOLUTION NO. 23386

RELATING TO PUBLIC HEALTH AND SAFETY: DECLARING AND REAFFIRMING MAYOR AND COUNCIL'S OPPOSITION TO CONSTRUCTION OF A NEW INTERSTATE HIGHWAY (INTERSTATE 11, "I-11") THAT BYPASSES THE CITY OF TUCSON AND TRAVERSES PRISTINE AND INVALUABLE SONORAN DESERT AREAS; AND DECLARING AN EMERGENCY.

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

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

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

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

WHEREAS, on June 18, 2019, the Mayor and Council adopted Resolution No. 23051, opposing the proposed alignment of I-11 that would have had the effect of bypassing the existing Interstate 10. The Mayor and Council found that any proposed

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

WHEREAS on September 9th, 2020, Tucson Mayor and Council unanimously endorsed a declaration of a “Climate Emergency” which among other measures calls for “developing and enhancing land use patterns that foster safe, multimodal, accessible, equitable, intelligent, and clean motorized and non- motorized travel options, infrastructure, and community connectivity; and

WHEREAS, an interstate highway in the Avra Valley would degrade the Sonoran Desert, sever wildlife corridors, impede washes and flood prone areas, open new areas to intense residential and commercial development far from existing urban centers, and encourage more car and truck travel at time when climate change and air pollution are growing concerns; and

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

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

WHEREAS, I-11 poses a water contamination risk to Tucson Water’s CAP water recharge facilities in Avra Valley, which provides drinking water to Tucson Water customers; and

WHEREAS, the City of Tucson and Tucson Water seek to protect their groundwater, surface water, and stormwater from contamination; especially during a time of historic drought and increased reliance on CAP water due to PFAS contamination of other water sources; and

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

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

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

WHEREAS, the Interstate 11 Final Tier 1 Environmental Impact Statement Recommended Alternative route would run through the Avra Valley, negatively impacting Tucson Mountain Park, Saguaro National Park - West, Ironwood Forest National Monument, Bureau of Reclamation's Central Arizona Project mitigation parcel, and severing linkages between important habitat areas and disturbing an unknown number of archeological sites; and

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

...

...

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

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

SECTION 1. The Mayor and Council strongly oppose the currently proposed alignment “West Option” alignment of I-11, that would have the effect of bypassing the existing Interstate 10. The Mayor and Council find that any alternative route that would result in the construction of a new interstate highway in or through Avra Valley would produce enormous adverse impacts to economic, environmental, historic, cultural, and archaeological resources that could not be adequately mitigated and that are contrary to the interstate design standards and criteria that must be applied to this project.

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

PASSED, ADOPTED AND APPROVED by the Mayor and Council of the City of  
Tucson, Arizona, August 10, 2021.

\_\_\_\_\_  
MAYOR

ATTEST:

\_\_\_\_\_  
CITY CLERK

APPROVED AS TO FORM:

REVIEWED BY:

\_\_\_\_\_  
CITY ATTORNEY

\_\_\_\_\_  
CITY MANAGER

MR/dg  
8/2/21