



APPENDIX C

Agency Comments

Agency Meeting Summaries
Agency Comments Received

Agency Scoping Meeting Summaries

Tucson Agency Meeting
Marana Agency Meeting
Casa Grande Agency Meeting
Avondale Agency Meeting

MEETING PURPOSE: Agency Coordination Meeting #1 – Tucson

DATE & TIME: Tuesday, May 2, 2017 10:00 AM

LOCATION: Pima Association of Governments – Large Conference Room
1 E. Broadway Boulevard, Suite 401; Tucson, Arizona

ATTENDEES: List of attendees provided in the attached sign-in sheets

MEETING NOTES

Purpose:	
The purpose of the Agency Coordination meeting was to meet with federal, state, regional, local, and tribal agencies/organizations that are Cooperating or Participating Agencies in the environmental review process for the I-11 Corridor Tier 1 EIS. The attendees were provided an overview of the alternatives selection process via PowerPoint and invited to submit comments or questions on the study.	
Key Discussion Points / Comments:	Commenter
1. Requested clarification on the green alternatives: based on additional analysis and input received, there is the opportunity that these may or may not advance into the Tier 1 EIS? [Response: Correct.]	Robert Young, Pima County
2. Is there the possibility that more than one 2,000 foot corridor alternative could be recommended, as a result of the Tier 1 EIS analysis? [Response: The goal of the NEPA process is to identify a Selected Alternative from among the Build and No-Build Alternatives, however the possibility does exist for multiple recommendations related to the corridor alternatives.]	Robin Raine, City of Tucson
3. Since this is a programmatic level EIS, will ADOT come back out, after the FEIS/ROD, to perform additional site-specific environmental analysis? [Response: Yes, additional analysis would occur as part of the Tier 2 NEPA analysis prior to implementation. Tier 2 environmental studies may occur for a portion of the longer I-11 Corridor, as funding becomes available. The current study process concludes with the ROD for the Tier 1 EIS.]	Jenny Neeley, Pima County
4. How will we understand how the alternatives are compared/analyzed against one another? [Response: An Alternative Selection Report (ASR) Evaluation Methodology and Criteria Report will be released in June, which describes the evaluation process for the identification of the alternatives to be carried	Dee Korich, Tucson Water

Purpose:	
<p>The purpose of the Agency Coordination meeting was to meet with federal, state, regional, local, and tribal agencies/organizations that are Cooperating or Participating Agencies in the environmental review process for the I-11 Corridor Tier 1 EIS. The attendees were provided an overview of the alternatives selection process via PowerPoint and invited to submit comments or questions on the study.</p>	
Key Discussion Points / Comments:	Commenter
into the Tier 1 EIS. Additionally, an EIS Methodology Report is under preparation to define the technical analysis approach for the Tier 1 EIS.]	
<p>5. Have alternate modes been considered; i.e., cross-border transportation and trade needs?</p> <p>6. [Response: While ADOT is focused on roadway alternatives, other modal facilities are not being precluded from future development. Appropriate grades for rail have been taken into consideration for defining the 2,000-foot alternative corridors. In addition, ADOT has met with the Class I railroads regarding their potential needs in the I-11 study area and they have not identified current plans to expand current facilities.]</p>	Linda Mayro, Pima County
<p>7. Will a summary report from the public comment period (May 2nd- June 2nd, 2017) be available to the agencies?</p> <p>[Response: Yes, all comments will be documented in a meeting summary report, and will be available for review.]</p> <p>Noted that the input that will be used by the technical team to help determine the reasonable range of alternatives for the EIS.</p>	Robin Raine, City of Tucson
<p>8. Will there be a document that explains the economic assumptions used in the analysis (e.g., definition of “economic development” or what is an “economic benefit”)?</p> <p>[Response: Economic development is approached at a very high level in the ASR. The more in-depth economic analysis will be conducted as part of the Tier 1 EIS; Tier 1 EIS Methodology Report will be completed this summer.]</p> <p>What is the issue resolution process for Participating Agencies per NEPA guidelines?</p> <p>[Response: ADOT will continue to meet with Participating Agencies throughout the entire process as needed for specific issue resolution. NEPA has a statutory process, which will be outlined as we kick off the EIS.]</p> <p>How will you incorporate induced growth into the ASR methodology?</p> <p>[An assessment of induced growth is not part of the alternatives screening process; this will be addressed during the Tier 1 EIS and will be analyzed during that phase of study.]</p>	James MacAdam, City of Tucson

Purpose:	
The purpose of the Agency Coordination meeting was to meet with federal, state, regional, local, and tribal agencies/organizations that are Cooperating or Participating Agencies in the environmental review process for the I-11 Corridor Tier 1 EIS. The attendees were provided an overview of the alternatives selection process via PowerPoint and invited to submit comments or questions on the study.	
Key Discussion Points / Comments:	Commenter
9. What additional analysis will be conducted on the green corridors to help inform if they advance into the Tier 1 EIS? [Response: At this point, we envision advancing them all unless we receive feedback otherwise. The team will be incorporating the agency and public input received during this round of outreach meetings into the decisionmaking process. In addition, the technical team is taking a deeper look at some corridor options to understand the constraints and opportunities better (e.g., ability to co-locate I-11 with an existing facility).	Linda Mayro, Pima County
10. Noted that the online mapping tool is missing some land use information. [Response: The technical team will look into the details.]	
11. Requested clarification on the roles of land management agencies and tribal partners. [Response: Most federal land management agencies are Cooperating Agencies on this study, which meet on a monthly basis to discuss ongoing project progress. Significant efforts have been made to coordinate and discuss project details with tribal partners on an ongoing basis.]	Linda Mayro, Pima County

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Attachments: Meeting Sign-in Sheets



Meeting Purpose: Agency Coordination

Location: PAG 1 East Broadway #401, Tucson, Arizona

Date: Tuesday, May 2, 2017 Time: 10:00 AM- 12:00 PM

SIGN-IN SHEET

Name	Organization	Phone	E-mail	Address
Kimberly Bodington	AECOM	602-448-2580	kimberlybodington@aec.com	7120 N. 10th St PHX 45020
ARVAN LIRANOFF	FHWA	602-352-8973	ARVAN.LIRANOFF@DOT.GOV	
Rebecca Yedlin	FHWA	602-352-8979	rebecca.yedlin@dot.gov	
JAY VAN ECHO	APOT	520-400-6207	jvanech@azdot.gov	
Robert Young	PCDOT	520-724-6777	robert.young@pima.gov	201 N. Stone Ave.
Jan Gordloy	Gordloy Group	520-327-6077	jan@gordloygroup.com	
Shelie Guinn	TDOT	520-637-6698	shelie.guinn@tucsonaz.gov	201 N. Stone Ave
Dee Korick	Tucson Water	520-837-2238	dee.korick@tucsonaz.gov	310 W. Alameda St.
Jason Seline	TEP	550-300-0586	jseline@tep.com	88 E. Broadway
Jenny Neetley	Pima Co.	724-9487	jenny.neetley@pima.gov	201 N. Stone Ave
Jamie Brown	PAC	792-1093	j.brown@pacgroup.com	on file

Contract No. 2015-013 / Project No. M5180 01P / Federal Aid No. 999-M(161)S

Page 1 of 2



Meeting Purpose: Agency Coordination

Location: PAG 1 East Broadway #401, Tucson, Arizona

Date: Tuesday, May 2, 2017 Time: 10:00 AM- 12:00 PM

SIGN-IN SHEET

Name	Organization	Phone	E-mail	Address
Jonathan Crowe	PCDOT	724-6383	Jonathan.Crowe@pima.gov	201 N. Stone Ave, 9 th Fl.
ROBIN RAINE	TDOT	791-4371	robin.raine@tucsonaz.gov	201 N. Stone Ave 6 th Fl
Melodee Royer James MacAdam	Tucson Water COT CMO	850-8950 837-4068	Melodee.Royer@tucsonaz.gov james.macadam@tucsonaz.gov	301 W. Alameda 255 W Alameda
Lividee Mayne Andrew Gunhill	Pima Co COT	724-6451 857-2109	Lividee.Mayne@pima.gov Andrew.Gunhill@pima.gov	201. N. Stone 310 W Alameda

MEETING PURPOSE: Agency Coordination Meeting #2 – Marana

DATE & TIME: Wednesday, May 3, 2017 1:00 PM

LOCATION: Town of Marana City Council Chambers
11555 W. Civic Center Dr. Marana, AZ

ATTENDEES: List of attendees provided in the attached sign-in sheets

MEETING NOTES

Purpose:	
The purpose of the Agency Coordination meeting was to meet with federal, state, regional, local, and tribal agencies/organizations that are Cooperating or Participating Agencies in the environmental review process for the I-11 Corridor Tier 1 EIS. The attendees were provided an overview of the alternatives selection process via PowerPoint and invited to submit comments or questions on the study.	
Key Discussion Points / Comments:	Commenter
1. Requested study team to identify and quantify environmental resources avoided in reaching reasonable range of alternatives. [Response: This will be documented as part of the Alternative Selection Report (ASR), which will be circulated for review this summer.]	Julie M., AGFD
2. Inquired when the ASR document would be available to agencies for review. [Response: The ASR will be drafted by the end of June 2017 for ADOT and FHWA review. It will be circulated to the Cooperating Agencies thereafter.] Inquired if the Draft Environmental Impact Statement (DEIS) will recommend a singular alternative. [Response: The goal is to identify one end-to-end (Nogales to Wickenburg) corridor alternative or the No-Build Alternative as the Selected Alternative at the conclusion of the ROD, although the possibility exists that more than one alternative – or potentially multiple options in a specific area – could be recommended.]	Lane Cowger, BLM
3. Inquired if the study team will make the shapefiles of the reasonable range of alternatives available to Cooperating Agencies. [Response: Yes, after the ASR is complete.]	Micah Horowitz, ASLD

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Attachments: Meeting Sign-in Sheets

Meeting Purpose: Agency Coordination

Location: Town of Marana City Council Chambers 11555 W. Civic Center Dr. Marana, Arizona

Date: Wednesday, May 3, 2017 Time: 1:00 PM-3:00 PM

SIGN-IN SHEET

Name	Organization	Phone	E-mail	Address
Kimberly Bodington	AECOM	602-648-2580	Kimberly.bodington@aecom.com	7720 N. Lum St. PHX 80000
Bill Kavonles	AGFD	928 341 4027	bkavonles@agfd.gov	9405 20 th St Yuma AZ
Lane Cowger	BLM	602 479612	lcowger@blm.gov	1 N Central Ave #500 Phoenix, AZ 85004
Bill Lorefice	Town of Marana	520 382-2516	blorefice@marana.gov	1555 W. Civic Center Dr Marana, AZ 85653
Lisa Shafer	Town of Marana	520 582-1909	lshafer@marana.gov	' '
Elisa Hamblin	Town of Orovalley	520-274-4847	ehamblin@orovalleyaz.gov	11000 N. La Canada, OV 85737
ARIAN LIRANKE	FHWA	602 382 8973	ARIAN.LIRANKE@DOT.GOV	
JAN RYIE				
Faram Apple	HDR			
Jackie Kuechenmeister	CITIZEN			
JOHN McNAMARA	AECOM	(602) 541-5766	john.mcnamara@aecom.com	7700 N. 16th Street #100 Phoenix, AZ 85000

Phone - Webinar

SIGN-IN SHEET

Name	Organization	Phone	E-mail	Address
Michal Horowitz	ASL			
Adam Springer	NPS			
Rebecca Yellin	FHWA			
Emily Lester	ADOT-Env			
Julie Mikolajczyk	AGFD			
Lauren Clementino	ADOT-HP			
Melissae	WAPA			
Joe Piroto				
Josiah Cady	ADOT			
Clifton Meek (partia)	EPA			

MEETING PURPOSE: Agency Coordination Meeting #3 – Casa Grande

DATE & TIME: Wednesday, May 10, 2017 10:00 AM

LOCATION: Peart Center
350 E. 6th Street. Casa Grande, Arizona

ATTENDEES: List of attendees provided in the attached sign-in sheets

MEETING NOTES

Purpose:	
The purpose of the Agency Coordination meeting was to meet with federal, state, regional, local, and tribal agencies/organizations that are Cooperating or Participating Agencies in the environmental review process for the I-11 Corridor Tier 1 EIS. The attendees were provided an overview of the alternatives selection process via PowerPoint and invited to submit comments or questions on the study.	
Key Discussion Points / Comments:	Commenter
1. How big of a factor will the underutilization of I-8 be weighing the alternatives? [Response: Capacity is one of several factors under the traffic category and will need to be compared against the others (e.g., travel times, level of service, etc).]	David Maestas, City of Maricopa
2. The reason I-8 is not currently being used by trucks is because it is not a direct route. [Response: The technical team has noted this from previous studies (Arizona State Freight Study) and will keep this under consideration.]	Craig McFarland, City of Casa Grande
3. How can the agencies and public be involved? [Response: Input opportunities are available on the website, including an online mapping tool, electronic or written comments, emails, letters, voicemails, etc.]	Craig McFarland, City of Casa Grande
4. After this round of input, will we match together alternative options from each section to create a set of end-to-end alternatives to advance into the Tier 1 EIS? [Response: Yes, this is necessary to meet the Purpose and Need.]	Dana Wamecke, Arizona Game and Fish Department
5. Make sure to coordinate with the Army Corps of Engineers (COE) Santa Cruz River Floodplain Study. [Response: Agreed, the team has been communicating with COE.]	Jerry Witt, Greene Reservoir Flood Control District

Purpose:	
<p>The purpose of the Agency Coordination meeting was to meet with federal, state, regional, local, and tribal agencies/organizations that are Cooperating or Participating Agencies in the environmental review process for the I-11 Corridor Tier 1 EIS. The attendees were provided an overview of the alternatives selection process via PowerPoint and invited to submit comments or questions on the study.</p>	
Key Discussion Points / Comments:	Commenter
<p>6. Will the MAG RTP major amendment to change the status of I-11 (Hassayampa Freeway) from I-10 to Wickenburg (in the Hassayampa Valley) from planned to programmed change the status of activities in this study?</p> <p>[Response: This study is proceeding to assess 2000-foot-wide Build Alternatives. Tier 2 activities would consider a more specific alignment and typically require the identification of funding.]</p> <p>Follow-up question: This action does not eliminate any alternatives in blue from further consideration in the Hassayampa Valley?</p> <p>[Response: No.]</p>	<p>David Maestas, City of Maricopa</p>
<p>7. Is there any support for running an I-11 corridor parallel to I-19 to the border?</p> <p>[Response: A parallel facility does not seem feasible because of physical and environmental constraints, as well as lack of agency and public support. Currently, both I-19 and SR 189 run parallel to each other and serve two border ports of entry. SR 189 is planned to undergo improvements as early as 2019.]</p> <p>Support for Option “I” vs utilizing existing I-8 route through Pinal County. This comment was seconded by Craig McFarland (City of Casa Grande), David Maestas (City of Maricopa), and Jason Hafner (Sun Corridor MPO).</p>	<p>Lance Donagan, City of Casa Grande</p>
<p>8. Please consider freight movement as a high priority. With that consideration, I-11 from a freight perspective needs to be an uncongested and direct route, so not through downtown Tucson nor through Gila Bend – ensure reliable travel times, access, and limited congestion.</p> <p>Maricopa, Casa Grande, and Eloy are planning to become a major industry area. Reach out to Casa Grande for updated economic activity center information.</p> <p>[Response: Technical team has noted.]</p>	<p>Craig McFarland, City of Casa Grande</p>
<p>9. Option “L” does not score well in some categories. Is this because there is a lack of population growth in that area?</p> <p>[Response: Yes.]</p>	<p>David Maestas, City of Maricopa</p>
<p>10. Does option “R” (SR 30) traverse major commercial or freight hubs in Buckeye?</p>	<p>David Maestas, City of Maricopa</p>

Purpose:	
The purpose of the Agency Coordination meeting was to meet with federal, state, regional, local, and tribal agencies/organizations that are Cooperating or Participating Agencies in the environmental review process for the I-11 Corridor Tier 1 EIS. The attendees were provided an overview of the alternatives selection process via PowerPoint and invited to submit comments or questions on the study.	
Key Discussion Points / Comments:	Commenter
[Response: Yes, both those planned by the Town, as well as documented in the MAG Freight Transportation Framework Study.]	

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Attachments: Meeting Sign-in Sheets



Staff:
 Karen
 Jen
 Finny
 Jackie
 Dawn

Meeting Purpose: Agency Coordination
 Location: Peart Center 350 E. 6th Street. Casa Grande, AZ
 Date: Wednesday, May 10, 2017 Time: 10:00 AM

SIGN-IN SHEET

Name	Organization	Phone	E-mail	Address
Craig McFarland	City of Casa Grande	520-251-0687	cmcg-mcfarland@cityofcasagrande.org	
Jane Higgs	SCMPO	520-705-5143	jhiggs@scmpo.org	
JASON KAUFMAN	SCMPO	920-705-5153	jkahne@scmpo.org	
LANICE DUNAGAN	CITY OF CASA GRANDE	520-252-1228	lanice.dunagan@cityofcasagrande.org	3171 N. LEARN AVE, CASA GRANDE AZ 85122
Dana Warnicke	AGFD	480-324-3547	dwarnicke@agfd.gov	
Jerry WITT	Greenwood Fed	602-550-2999	jerry.witt@whodint.com	
Jeanie Cady	ADOT	602-712-8633	jeanie@azdot.gov	
David R. Maestas	City of Maricopa	520-316-6988	david.maestas@maricopa-az.gov	
Carlos Lopez	ADOT			

MEETING PURPOSE: Agency Coordination Meeting #4 – Avondale

DATE & TIME: Tuesday, May 16, 2017 10:00 AM

LOCATION: Estrella Mountain Community College
3000 N. Dysart Rd., Avondale, AZ

ATTENDEES: List of attendees provided in the attached sign-in sheets

MEETING NOTES

Purpose:	
The purpose of the Agency Coordination meeting was to meet with federal, state, regional, local, and tribal agencies/organizations that are Cooperating or Participating Agencies in the environmental review process for the I-11 Corridor Tier 1 EIS. The attendees were provided an overview of the alternatives selection process via PowerPoint and invited to submit comments or questions on the study.	
Key Discussion Points / Comments:	Commenter
1. Maricopa County now owns land within the Vulture Mountain Recreation Area. The County is glad to see the northern portion of alternative option V removed from further evaluation. [Response: The technical team has noted.]	Lauren Bromley, Maricopa County Parks and Recreation
2. The EIS for the Santa Cruz River Floodplain Study is underway, with a DEIS anticipated in 2019. The US Army Corps of Engineers study team is interested in GIS shapefiles of the alternatives. [Response: Once the Alternatives Selection phase is complete, GIS data will be shared with Cooperating and Participating Agencies.]	Jesse Rice, US Army Corps of Engineers
3. The Air Quality Department is most interested in options “M” and “K” that provide a bypass around metropolitan Phoenix, alleviating congestion through the center of the city and reducing air quality concerns. [Response: The technical team has noted.]	Richard Sumner, Maricopa County Air Quality
4. The Flood Control District manages several pieces of infrastructure east of the Hassayampa River, including an 8-mile dam north of I-10 that would conflict with alternative option W. [Response: The technical team has noted.]	Michael Duncan, Flood Control District of Maricopa County
5. Noted that the Flood Control District is also studying a levy on the north side of the Gila River (south of option “R”): El Rio Levy. The Sonoran Parkway EIS is expected to be final this year. This corridor generally overlays with alternative option “M”. Goodyear annexed Mobile	Ed Kender, BLM

Purpose:	
<p>The purpose of the Agency Coordination meeting was to meet with federal, state, regional, local, and tribal agencies/organizations that are Cooperating or Participating Agencies in the environmental review process for the I-11 Corridor Tier 1 EIS. The attendees were provided an overview of the alternatives selection process via PowerPoint and invited to submit comments or questions on the study.</p>	
Key Discussion Points / Comments:	Commenter
<p>and needs to provide services to the area. The City sees a need for both the parkway facility (local access) and I-11 (high capacity, longer distance travel). This document discusses wildlife crossings between Maricopa and Estrella Mountains related to options "M" and "L".</p> <p>[Response: The technical team has noted.]</p> <p>Technical team asked Mr. Kender if an RMP amendment would be needed if I-11 traverses BLM land in the central section. He indicated that an amendment may be needed, but would occur during Tier 2 activities.</p>	
<p>6. Follow up with the City of Goodyear on the Sonoran Parkway and relationship to I-11.</p> <p>[Response: Technical team has noted.]</p>	<p>Bill Olsen, Newland Communities</p>

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Attachments: Meeting Sign-in Sheets



Meeting Purpose: Agency Coordination Meeting

Location: Estrella Mtn Community College, 3000 N. Dysart Rd., Avondale, AZ

Date: Tuesday, May 16, 2017 Time: 10:00 AM

SIGN-IN SHEET

Name	Organization	Phone	E-mail	Address
Jesse Rile	USACE	602-230-6854	jesse.m.riley@usace.army.mil	3636 N. Central Ave Ste 900 Phoenix 85012
Helen Krause	MCATD	602-506673	hkrause@mc.ti.wa.gov	1001 N Central Ave Phoenix 8004
Carlos Lopez	ADOT	602-712-4786	clopez@adot.gov	
Jay Van Emden	ADOT	520-400-6007	juvanech@adot.gov	
ED KENDER	BLM	623-580-5616	ekender@blm.gov	21405 N 7th Ave PHOENIX AZ 85027
Joanie Cady	ADOT	602-712-8633	jcady@adot.gov	1011 W. Jackson, PHX
Kimberly Badington	AGCOM			
Jen Ryne	AGCOM			
Karen Apple	HPR			
Jackie Kuechemmister	CH2M			
Don Anderson	CH2M			



Meeting Purpose: Agency Coordination Meeting

Location: Estrella Mtn Community College, 3000 N. Dysart Rd., Avondale, AZ

Date: Tuesday, May 16, 2017 Time: 10:00 AM

SIGN-IN SHEET

Name	Organization	Phone	E-mail	Address
Richard Sumner	Maricopa County Air-Quality Dept.	602-506-1842	sumner.r@mail.maricopa.gov	1001 N. Central Ave. Phx AZ 85004
Michael Dunican	AVONDALE DISTRICT OF MAR. CO.	602-506-4732	mdun@maricopa.gov	2801 W DURANGO ST, PHX, AZ 85009
William Olson	NEWLAND - ESFOLK	602 618 9700	wolson@newlandco.com	5090 N. 40 ST. Phx 85016
Lauren Bramley	MC Parks		laurenb@maricopa.gov	

Agency Comments Received

Arizona Game and Fish Department
Bureau of Land Management
US Army Corps of Engineers
City of Tucson
National Park Service
Pima County Administrator's Office
Pima Natural Resource Conservation District
Pinal County

June 1, 2017

Rebecca Yedlin
FHWA Environmental Coordinator
Federal Highway Administration
4000 N. Central Ave., Suite 1500
Phoenix, AZ 85012

Re: AGFD Comments for the I-11 Tier 1 EIS Alternatives Selection Report Public Open House

Dear Ms. Yedlin:

The Arizona Game and Fish Department (Department) recently attended the May 2017 Federal Highway Administration (FHWA) and Arizona Department of Transportation (ADOT) Cooperating/Participating Agency Meetings and Public Information Meetings that provided preliminary information on the *Alternatives Selection Report (ASR)* for the Tier I Environmental Impact Statement (EIS) process for the I-11 Corridor.

The Department appreciated this opportunity to participate in the meetings, and has the following comments regarding the preliminary ASR information:

- The Department was pleased to see ADOT's recommendation that Segments V (Vulture Mountains), O and P (Arlington Valley), and J (Vekol Valley), not move forward into the EIS for further analysis. These segments all traverse areas of high quality habitat and very sensitive biological resources.
- The portion of Interstate 10 (I-10) between S/T/U and Q should be considered a segment for evaluation. This allows more for more flexibility in identifying connections between the North and Central Study Areas.
- The Department was pleased to see ADOT's recommendation to evaluate a connection between Segments E/F (Santa Cruz Valley) and B (I-10). This allows more for more flexibility in identifying connections through the South Study Areas.

It is noted that ADOT did not incorporate the Department's criteria recommendations into the May 2017 *Alternative Selection Report Methodology and Criteria Report*. Additionally, only one of the Department's many comments was acknowledged in the May 2017 Comment Response Summary for the *Alternative Selection Report Methodology and Criteria Report*. Had the ASR Methodology and Criteria included habitat fragmentation and loss, it is likely that one or more of the Segments would have been ranked differently. For example, Segment M bisects a large block of primarily intact habitat; the parameters used by ADOT did not capture the significant habitat fragmentation and loss that would occur due to this segment bisecting the East Buckeye Hills and the Maricopa Mountains.

- The Comment Response Summary for the *Alternative Selection Report Methodology and Criteria Report* should be revised to include the Department comments that were submitted to ADOT/FHWA on March 17, 2017. The comments were submitted exactly 30 days from receipt of the Draft report for review.
- Moving forward, the criteria suggested in the Department's March 17, 2017 letter should be included as criteria for analysis of the Alternatives in the Tier 1 EIS. Additionally, indirect impacts to all of the Sensitive Environmental Resources criteria should be analyzed, as the direct impacts alone do not capture the landscape level effects that roadways have to an area.

The Department is currently preparing an extensive report that details wildlife and habitat resources within the I-11 Tier 1 EIS (Wickenburg to Nogales) Study Area. This document will provide expert knowledge of resources within the study area. In the coming weeks, the Department will submit this to ADOT/FHWA for inclusion into the Draft EIS.

The Department trusts our comments and recommendations for *Alternative Selection Report* and its associated *Criteria and Methodology Report* will aid in your alternative selection and evaluation. We continue to look forward to collaborating with FHWA and ADOT on this important transportation project. If you have any questions or wish to further discuss our comments and concerns, please contact me at cboucher@azgfd.gov (623-236-7615).

Sincerely,



Cheri A. Bouchér
Project Evaluation Program Specialist
Arizona Game and Fish Department

cc: Aryan Lirange, FHWA
Jay Van Echo, ADOT Project Manager
Lisa Ives, AECOM Consultant Team Project Manager
Jennifer Pyne, AECOM Associate Vice President
Clifton Meek, EPA



United States Department of the Interior



BUREAU OF LAND MANAGEMENT

Phoenix District
Hassayampa Field Office
21605 North 7th Avenue
Phoenix, Arizona 85027
www.blm.gov/az/

May 12, 2017

In Reply Refer To:
1610 (P010)

Karla S. Petty
US Department of Transportation
Federal Highway Administration
4000 N Central Avenue, Suite 1500
Phoenix, AZ 85012-3500

Dear Ms. Petty:

The Bureau of Land Management (BLM), Hassayampa Field Office, appreciates this opportunity to offer our comments on alternative routes under consideration in the Interstate 11 Tier 1 Environmental Impact Statement, particularly their conformance with the BLM's Bradshaw-Harquahala Resource Management Plan (RMP) in the northern portion of the I-11 study area. This is to address Federal Highway Administration 4F property requirements and our joint planning requirement.

The BLM is particularly interested in avoidance, minimization, and mitigation of potential impacts to the Vulture Mountains Cooperative Recreation Management Area (CRMA) south of Wickenburg. The BLM would prefer complete avoidance of the Vulture Mountains CRMA. This could be accomplished by selecting Segment S or a hybrid of Segments S and T, which skirt the CRMA to the west. This alternative would not require an RMP amendment.

Alternatively, the Bradshaw-Harquahala RMP identifies a multi-use corridor in the western portion of the Vulture Mountains CRMA. Segment U is within this corridor, and future development in the corridor could be collocated with existing electrical transmission infrastructure in the corridor to consolidate disturbance and environmental impacts.

The BLM would consider amendments to the Bradshaw-Harquahala RMP needed to permit highway development as part of a future right-of-way application and Tier 2 analysis.

The BLM encourages you to eliminate alternative segments V and W because of their potential impact to access and recreation within the Vulture Mountains CRMA as well as the Vulture Mountains Area of Critical Environmental Concern, wildlife habitat, and other sensitive natural and cultural resources in the area.

I appreciate our cooperating agency relationship on this important project and look forward to continued cooperation between our agencies now and in future Tier 2 permitting. Please don't hesitate to reach out to me at rhawes@blm.gov or 623-580-5530, or the BLM's project manager, Lane Cowger at lcowger@blm.gov or 602-417-9612, with any inquires about this correspondence or other needs.

Sincerely,



Rem Hawes
Field Manager

Cc: Rebecca Yedlin
USDOT Federal Highway Administration
4000 N Central Ave
Phoenix, AZ 85012-3500

Aryan Lirange
USDOT Federal Highway Administration
4000 N Central Ave
Phoenix, AZ 85012-3500

Lane Cowger, BLM AZSO, LLAZ9200



**DEPARTMENT OF THE ARMY
LOS ANGELES DISTRICT, U.S. ARMY CORPS OF ENGINEERS
3636 NORTH CENTRAL AVENUE SUITE 900
PHOENIX, AZ 85012-1939**

May 31, 2017

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

Subject: Comments on the Proposed Alternative Corridor Options for the Tier 1 Environmental Impact Statement for Interstate 11 Corridor between Nogales and Wickenburg, Arizona

Dear Study Team:

The U.S. Army Corps of Engineers (Corps) attended the May 16, 2017 Cooperating and Participating Agency Meeting in Avondale, Arizona, where information was presented on the range of corridor alternatives being considered for the Tier 1 Draft Environmental Impact Statement (Draft EIS) for the Interstate 11 Corridor between Nogales and Wickenburg, Arizona (Project) (Corps File No. SPL-2016-00483). We appreciate the opportunity to provide comments on the proposed corridor options under consideration by the Federal Highway Administration (FHWA) and the Arizona Department of Transportation (ADOT). The comments below are provided pursuant to the National Environmental Policy Act (NEPA), Council on Environmental Quality regulations (40 CFR Parts 1500-1508) and the March 18, 2013 Memorandum of Agreement between ADOT, FHWA and the Corps concerning funding for the Department of the Army permit process on priority Federal-aid highway projects.

Comments regarding Section 404 of the Clean Water Act

As stated in previous communications, the broad scope of the Draft EIS and the width of the corridors being analyzed make it difficult to determine with certainty the potential impacts to Waters of the United States (WOTUS) associated with each corridor alternative. The information presented to the Corps on the proposed corridor alternatives included maps depicting the 100-year flood plain and areas with potential to be wetlands. While this information is useful for identifying areas where aquatic resources may potentially occur, it does not accurately represent the actual presence or abundance of aquatic resources such as ephemeral washes. The Casa Grande-Eloy area is an example of this, where the 100-year floodplain is quite broad but the actual acreage of aquatic resources (and therefore areas with potential to be WOTUS) is much less. However, it should be noted that the *Evaluation Methodology and Criteria Report* for the Draft EIS states that the National Hydrography Dataset data will be included during the evaluation of alternatives, which should provide a better estimate on the presence and abundance of aquatic resources when used with these other data sources. This data will allow decision-makers to compare corridor-level impacts to aquatic resources that may be WOTUS, and we look forward to reviewing this information in the Draft EIS.

Consistent with the 404(b)1 Guidelines (40 CFR 230), the Corps prefers the alternatives that avoid and minimize impacts to WOTUS, particularly those areas with high functions

and values. Specifically, Alternatives O, P, and N are not preferable due to the potential to impact intermittent and perennial reaches of the Gila River. Where avoidance is not feasible, FHWA must demonstrate that the preferred alternative for the final route is the least environmentally damaging practicable alternative (LEDPA) that achieves the overall project purpose while not causing or contributing to significant degradation of the aquatic ecosystem. At the Tier 1 level, FHWA should present enough information to ensure that the corridor chosen is the corridor most likely to contain the LEDPA.

Furthermore, alternatives such as A, B, G, H, K, Q1, and Q2 that utilize existing corridors in WOTUS are generally preferred over developing corridors in new locations (An exception is Alternative W near Wickenburg, which should be carefully evaluated due to the potential to impact the high-value resources associated with the Hassayampa River). Modification/expansion of existing structures in WOTUS may be all that is required to achieve the project's purpose, which would minimize new impacts and potentially reduce permitting requirements for any project proposed as a result of this study and subsequent Tier 2 analyses. Even if new structures are required, locating these within existing corridors reduces the distribution of impacts across affected watersheds and minimizes impacts associated with connectivity and habitat fragmentation.

Lower Santa Cruz Feasibility Study

As previously mentioned in our April 2016 pre-scoping meeting, the Corps is currently undertaking the Lower Santa Cruz River Flood Risk Management Feasibility Study in Pinal County, which will evaluate strategies for minimizing flood risks along the river and its tributaries. At this time, no specific projects are being proposed as part of this study. However, we would like to continue to coordinate information sharing between the two studies since the projects that may be implemented as a result of either study may have impacts to one another that should be considered during the NEPA process. Priyanka Wadhawan in the Los Angeles District's Programs and Project Management Division is the point of contact for stakeholders in our study, and can be reached at 213-452-3802 or at Priyanka.Wadhawan@usace.army.mil.

Thank you for the opportunity to provide comments on the corridor alternatives being considered for the Draft EIS. Jesse Rice, Regulatory Project Manager, is the point of contact for the Corps on the Interstate 11 Corridor. You may contact him at (602) 230-6854 or via e-mail at Jesse.M.Rice@usace.army.mil. Please help me to evaluate and improve the regulatory experience for others by completing the customer survey form at http://corpsmapu.usace.army.mil/cm_apex/f?p=regulatory_survey.

Sincerely,

Sallie Diebolt
Chief, Arizona Branch
Regulatory Division



CITY OF
TUCSON
OFFICE OF THE
CITY MANAGER

May 5, 2017

Jay Van Echo
ADOT I-11 Study Manager
Arizona Department of Transportation
Sent via electronic mail

RE: 999-M(161)S
I-11, I-19/SR 189 to US 93/SR 89
TRACS No. 999 SW 0 M5180 01P
I-11 Corridor Tier 1 EIS
Evaluation Methodology and Criteria for Alternatives Selection

Dear Jay,

Thank you for meeting with City of Tucson staff on April 3, 2017 regarding the City's comments on the *Evaluation Methodology and Criteria for Alternatives Selection*. As a follow-up to one of the items discussed in that meeting, we are providing detailed information on City of Tucson Water properties and facilities within the Avra Valley. This will be pertinent to your considerations, as Corridor Options C and D (as identified at <http://www.i11comment.com/Home/Map>) would both appear to directly and substantially impact these properties and facilities. The following information is provided via numbered electronic pdf documents attached to this communication:

- Solar Farm Lease (1,1a,1b)
- Solar Farm Lease
- Farm Water Rights
- Habitat Conservation Plan (4, 4a, 4b, 4c, 4d, 4e)
- CAVSARP Section 7 Permit (5, 5a, 5b, 5c, 5d)
- CAVSARP Map
- SAVSARP Map
- CAVSARP/SAVSARP Capital and Operating cost
- Phoenix Inter AMA agreement (9, 9a)
- Audubon Agreements (10, 10a)

You should receive 23 documents. In addition, as a courtesy we are also re-sending maps and GIS shape files associated with these properties, which were provided to the ADOT I-11 project team in summer of 2016.

To: Jay Van Echo
Date: March 17, 2017
Page 2 of 2

Please note that these files will be sent in three separate emails. Do not hesitate to contact me with any questions.

Sincerely,

A handwritten signature in black ink, consisting of a large, stylized 'J' and 'M' followed by a horizontal line extending to the right.

James MacAdam
Project Manager

cc: Michael J. Ortega, City Manager
Joyce Garland, Chief Financial Officer and Assistant City Manager
Albert Elias, Assistant City Manager
Lynne Birkinbine, Deputy Director, Planning and Development Services
Timothy Thomure, Director, Tucson Water
Daryl Cole, Director, Tucson Department of Transportation
Andrew Greenhill, Manager, Intergovernmental Affairs
Farhad Moghimi, Executive Director, Pima Association of Governments
Jennifer Pyne, I-11 Project Team, AECOM



IN REPLY REFER TO:

United States Department of the Interior

NATIONAL PARK SERVICE

Saguaro National Park
3693 South Old Spanish Trail
Tucson AZ 85730



June 2, 2017

Rebecca Yedlin
Environmental Coordinator
FHWA – Arizona Division
4000 N. Central Ave., Suite 1500
Phoenix, AZ 85012

Dear Ms. Yedlin:

The National Park Service (NPS) attended the public scoping meeting at the Arizona Riverpark Inn in Tucson on May 2, 2017, for the preparation of an Environmental Impact Statement (EIS) for the Interstate I-11 Corridor Project. We appreciate the opportunity to submit additional thoughts and comments in regards to how this project may affect Saguaro National Park (Park).

Our specific comments on the meeting materials and presentation follows:

- **Symbology for Sensitive Environmental Resources.** The page entitled “South Section: Screening Results”, shows Alternative C as “*Reasonably meets criteria*” and Alternative D as “*Least meets criteria*” for Sensitive Environmental Resources. The NPS requests that both alternatives be identified as “*Least meets criteria*”. While Alternative D is located slightly farther from Saguaro National Park than Alternative C, it is still ½ mile from the park and ¾ mile from federally-designated Saguaro Wilderness. The NPS suggests that any route bisecting the Avra Valley would have similar impacts to environmental resources such as wildlife corridors, and therefore would warrant the same rating for each alternative.
- **Communication of potential multi-modal use.** The NPS requests additional information be provided regarding the uses for the corridor to include freight rail, passenger rail and a utility corridor. This would help to better understand the environmental impacts to Park resources. We understand that impacts of these additional uses will be assessed in-depth at a later time, however the NPS requests that an analysis of impacts from the additional facilities be utilized as part of the current process in determining route selection.

In order to better understand the full implications of the proposed development on Saguaro National Park, it would be beneficial to holistically evaluate the potential impacts rather than utilizing a fragmented analysis that may not directly address impacts to the Park. We would also recommend that the EIS give attention to any mitigation options necessary to avoid adverse

impacts on these resources, and identify follow-up monitoring necessary to evaluate the efficacy of any mitigation measures.

Finally, we wish to reiterate our assessment that if this project is to move forward, we would strongly prefer the alternative that utilizes the current Interstate 10 corridor. Even with mitigations, the two western alignment alternatives would have severe and widespread impacts to Saguaro National Park, federally-designated Saguaro Wilderness, associated Class I Airshed, natural sounds, viewsheds, night skies, plant communities and wildlife.

Thank you again for the opportunity to provide these comments. We appreciate your attention to our concerns. The NPS is committed to working collaboratively with our state, federal, and tribal partners to develop and implement a cooperative framework for sound science-based management of the I-11 corridor. If you have any questions about these comments, please contact me at 520-733-5101 or Scott Stonum at 520-733-5170.

Sincerely,



Leah McGinnis
Superintendent



COUNTY ADMINISTRATOR'S OFFICE

PIMA COUNTY GOVERNMENTAL CENTER
130 W. CONGRESS, FLOOR 10, TUCSON, AZ 85701-1317
(520) 724-8661 FAX (520) 724-8171

C.H. HUCKELBERRY
County Administrator

June 7, 2017

Ms. Rebecca Yedlin
FHWA Environmental Coordinator
Federal Highway Administration
4000 N. Central Avenue, Suite 1500
Phoenix, Arizona 85012

Re: Interstate 11 Corridor Tier 1 Environmental Impact Study, Corridor Alternatives and Evaluation Methodology, and Criteria Report Comments

Dear Ms. Yedlin:

Pima County appreciates the opportunity to review and comment on the range of corridor alternatives and the Evaluation Methodology and Criteria Report in particular. Pima County has multiple interests and roles in addressing a major infrastructure program such as Interstate 11. One of these roles is expanding the economic and employment base of the region. In this respect, infrastructure and the flow of employees, finished goods and raw materials are critical points considered by companies when evaluating locating to a region. A number of factors that could affect the decision of a major employer to locate in the region, but a primary consideration is travel efficiency. Projections from the 2008 ADOT I-10 Bypass Study Follow-up report predict Interstate 10 at Congress would reach Service Level F by 2030, which would have a significant negative effect on travel.

Additionally, Arizona is a "pass-through" state with large surface transportation volumes traveling from California to points east and from Texas to California. Based on a new paradigm in trucking which focuses on one-day trips, southern and central Arizona are prime sites for logistics and distribution points into California. Truck traffic coming from Mexico is expanding at a rate of approximately five percent per year with passenger vehicle volume growth exceeding that rate. The majority of truck traffic coming from Mexico, or Nogales, is "pass-through" traffic and if routed through the urban area will impact local transportation efficiency. As such, it is important to maintain a viable and efficient roadway network that encourages growth in the region and supports Interstate traffic from the east, west, and south along key commerce corridors. Developing a long-range strategy that provides appropriate surface

Ms. Rebecca Yedlin

Re: I-11 Corridor Tier 1 EIS, Corridor Alternatives and Evaluation Methodology and Criteria
Report Comments

June 7, 2017

Page 2

transportation capacities is critical to maintaining the economic competitiveness of the region and addressing the impacts of commercial and residential growth.

It is clear that to be effective, any future Interstate 11 Corridor must terminate at the Nogales Mariposa Point of Entry. Through Pima County, there are two fundamental routes: 1) along the existing Interstate 10/Interstate 19 system; and 2) a new route through generally the Avra Valley. Both have advantages and disadvantages.

If the existing interstate route were selected, impacts and traffic volumes would require interstate widening and perhaps double decking with associated costs and urban socioeconomic impacts related to noise, access and public safety.

The conceptual route through Avra Valley developed by Pima County considered both cultural and environmental features and avoided Bureau of Reclamation lands with the exception of an area immediately east of the Tohono O'odham Nation. Additionally, it incorporated the use of an elevated roadway section to facilitate wildlife corridors, which is a proven concept. By utilizing a route on primarily undeveloped State, County and City lands, all but a few residences were avoided along the 56-mile route.

If the Avra Valley route is selected, significant environmental mitigation will be necessary to ensure the route does not induce urban sprawl and adequately mitigates for impacts that may sever wildlife corridors or impact environmentally sensitive lands. These impacts can be mitigated with one exception, that being impacts to either the Tohono O'odham Nation in the Garcia Strip area or the Bureau of Land Management (BLM) Wildlife Corridor established as a mitigation measure for the Central Arizona Project.

Pima County remains committed to preserving the valuable cultural and environmental resources in our region while allowing for future growth considerations that benefit the economy and citizens of our community.

If the Tohono O'odham Nation objects to a route through their lands along the Garcia Strip, or if it is impossible to avoid impacts to the BLM's Wildlife Corridor, the Avra Valley route is not feasible. The only remaining route would be on top of the existing Interstates 10 and 19.

Sincerely,



C.H. Huckelberry
County Administrator

CHH/mjk

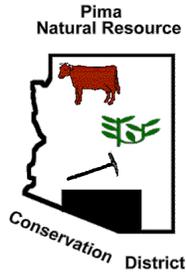
Ms. Rebecca Yedlin

Re: I-11 Corridor Tier 1 EIS, Corridor Alternatives and Evaluation Methodology and Criteria
Report Comments

June 7, 2017

Page 3

- c: The Honorable Edward Manuel, Chairman, Tohono O’odham Nation
 The Honorable Phyllis Juan, Chair, Shuck Toak District, Tohono O’odham Nation
 The Honorable Austin Nunez, Chairman, San Xavier District, Tohono O’odham Nation
 Carmine DeBonis, Jr., Deputy Pima County Administrator for Public Works
 Dr. John Moffatt, Director, Pima County Economic Development
 Priscilla Cornelio, Director, Pima County Transportation
 Linda Mayro, Director, Pima County Sustainability and Conservation
 Chris Poirier, Deputy Director, Pima County Development Services
 Jonathan Crowe, Principal Planner, Pima County Transportation



Pima Natural Resource Conservation District
Pima Center for Conservation Education, Inc.
NRCS Plant Materials Center
3241 N. Romero Road
Tucson, AZ 85705
(520) 971-2962

Interstate 11 Tier 1 EIS Study Team
c/o ADOT Communications
1655 West Jackson Street, Mail Drop 126 F
Phoenix, Arizona 85007
I-11ADOTStudy@hdrinc.com
<http://www.i11study.com/Arizona>

RE: Tier 1 Environmental Impact Statement for Interstate 11 Corridor between Nogales and Wickenburg, Arizona; Federal Register Vol. 81, No. 98 at 32007, et seq. (Submitted via website, and by email) These comments supersede comments submitted earlier.

The Pima Natural Resource Conservation District (District) herein provides comments in opposition to Corridor Alternatives C, D, E, and F, and the proposed Tucson bypass route through Avra Valley and northwest along the edges of one National Park and two National Monuments, for the future CanaMex Transcontinental Corridor—also known as Interstate 11.

About the Pima Natural Resource Conservation District

The Arizona State Legislature created the District in 1942 (Laws, 1941, Ch. 43, § 2). The District is presently governed under Chapter 6 of Title 37 of the Arizona Revised Statutes. The District is structured as a hybrid of a state agency funded under the State Lands Natural Resources Division *and as an independent local unit of Arizona government* with a Board of Supervisors consisting of both elected and Governor-appointed Supervisors. The expertise of the Pima NRCD is recognized by Arizona statute 37-1054 (A) as follows:

“This state recognizes the special expertise of the districts in the fields of land, soil, water and natural resources management within the boundaries of the district.”

The District works together with and represents “cooperators” who are persons having natural resources under their control and who have each voluntarily signed an agreement to pursue soil and water conservation efforts in cooperation with the District.

The District’s geographical boundaries roughly encompass all areas of Pima County excluding the Yaqui and Tohono O’Odham Nations’ reservation lands. The District covers 2.14 million acres of land in Pima County and a small area of southern Pinal County encompassing the Los Robles

Archaeological District.

About the CanaMex Corridor

The CanaMex Corridor is part of the North American Free Trade Agreement (NAFTA). Its planners envision it will become the major trans-continental expressway for transport of goods between ocean shipping ports in Mexico and Canada.

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

Impacts: Loss of District Cooperators

The District has cooperators who are primarily agricultural producers. They are scattered throughout eastern Pima County. The District has cooperators whose homes and/or businesses could be subject to eminent domain. Therefore, the District could lose a portion of its cooperator base regardless whether the existing infrastructure of Interstate 10 is expanded or a new Interstate 11 route bypasses Tucson through the Avra Valley.

Environmental features of the Avra Valley

The Avra Valley presently provides habitat to a broad diversity of wildlife due to its close proximity to the upper Sonoran Desert ecosystem, the Lower Colorado River ecosystem, the Chihuahuan grasslands to the south in Altar Valley, and montane ecosystems in the nearby low mountain ranges. A low pass over the Continental Divide in southern New Mexico facilitates a bird migration corridor from the eastern states into southern Arizona, and northward through the Avra Valley.

The Avra Valley serves as an important bird migration corridor with notable “hotspots” identified by the Cornell Laboratory of Ornithology based on thousands of submitted birdwatchers’ checklists (*See ebird.org/ebird/hotspots.*) These hotspots include the Avra Valley Water Treatment Plant with 258 species; the Arizona-Sonora Desert Museum with 171 species; the Central Arizona Project Recharge Basin with 179 species; Tucson Mountain Park with 104 species; and Saguaro National Park West with 137 species.



Figure 1. Rare scarlet tanager photographed in an ironwood tree on June 2, 2009 on the northwest end of the Avra Valley. The location was within 2 miles of the CanaMex Corridor study area boundary. Another scarlet tanager was spotted the same location in 2013.

About Tourism in the Avra Valley

Commercial tourist attractions in the Avra Valley include two or three western dude ranches, steakhouses, Old Tucson Studios, and the Arizona-Sonora Desert Museum. Within 30 miles, as the crow flies, is the Kitt Peak National Astronomical Observatory.

About Avra Valley residents

According to the 2010 U.S. census, approximately 6,000 people reside in about 2,000 households in a 22 square mile area in the Avra Valley. One eighth of Avra Valley residents are retirees, slightly less than 1/8 are military veterans, and 1/4 are persons under the age of 18. Four-fifths of the housing is owner-occupied.

With homes in Avra Valley available for under \$250,000 and median household income around \$45,000, residents have chosen the Avra Valley as an affordable place to live in relative peace and quiet. It is dotted with small-acreage farms with easy access to jobs, public services and commercial outlets in Tucson within a 45-minute drive.

Environmental impacts

We have been told, but have not confirmed, that the proposed Tucson bypass would force 47 Avra Valley and Picture Rocks families from their homes to make room for the CanaMex Corridor. Regardless of how many families are displaced, it is reasonable to assume the increases in noise, light pollution, and air pollution associated with the CanaMex Corridor could significantly degrade the quality of life that was originally sought by every family or resident living in the northern end of Avra Valley.

The noise and pollution from the proposed Avra Valley route for the CanaMex Corridor would also negatively impact the quality and availability of outdoor recreation opportunities within a 45-minute drive from Tucson.

A scientific study is necessary, prior to approval of this proposed route, to determine whether the increase in air pollution (exhaust products of internal combustion) would contaminate or negatively impact the Central Avra Valley Storage and Recovery Project (CAVSARP).

The proposed Avra valley route would degrade the native wildlife habitats that were set aside for protection in the Saguaro National Park West, Tucson Mountain Park, Ironwood Forest National Monument, and the U.S. Bureau of Reclamation's Central Arizona Project wildlife mitigation preserve.

Rural tourist attractions including the Arizona-Sonora Desert Museum and Old Tucson would become urban islands and thereby be degraded in quality and the ability to continue present offerings. This will negatively impact Pima County's tourism industry. Due to increased traffic noise, Old Tucson Studios might never be restored to a viable movie filming location.

The Arizona-Sonora Desert Museum currently hosts "Creatures of the Night" and "Astronomy Night" shows almost weekly on cool summer nights. The proposed CanaMex segment directly bordering the museum grounds would destroy the serene rural desert ambiance, disrupt natural wildlife ecosystems in the area, and could thereby negatively impact this major Tucson area tourist destination.

As already demonstrated, southern Arizona is also a tourism destination for its dark, starry nights. Light pollution introduced by the proposed CanaMex Corridor segment through Avra Valley would negatively impact the Kitt Peak National Observatory.

The Ironwood Forest National Monument on the north end of the Avra Valley is a destination for stargazers. A residential subdivision on the northern boundary of the monument, Silverbell Estates, was built decades ago specifically to attract stargazers. Its streets are all named for astronomical objects.

When the comet Hayakutake appeared in 1996, it was invisible east of Gates Pass. In the darkness of the Ironwood Forest National Monument on the north end of Avra Valley and within two miles of the proposed CanaMex Corridor study area, however, the comet and its spectacular 80-degree tail were seen in their full glory—an almost frightening sight.

Light and noise pollution may also negatively impact nocturnal wildlife that depend on the Brawley, Los Robles and Santa Cruz watersheds in the Avra Valley, although we are unaware of specific studies investigating that possibility. We are likewise unaware of any studies that have investigated the impacts of light pollution on local flora such as the night-blooming “Queen of the Night” cactus. We do not rule out the possibility that significant harm can occur. The EIS must address this issue.

Local Sentiment

In 1996, Pima County voters approved an open space bond that facilitated the purchase of 7,300 acres of land. In 2004, Pima County voters approved the Sonoran Desert Conservation Plan (SDCP) and its accompanying \$174 million bond package to preserve 47,000 additional acres of open space and the county’s cattle ranching heritage.

The voters passed the SDCP bond with full knowledge that the increased debt would force them to pay significantly higher property taxes than the residents of any of the other 14 counties in Arizona. They also understood that future high-paying job opportunities in mining and home construction would forever be destroyed. The citizens of Pima County knowingly chose to make these sacrifices in order to preserve wildlife habitat and open spaces from the irreversible impacts of development.

The proposed CanaMex segment through the Avra Valley therefore violates the values of the Pima County residents, at least those who cared enough to vote, and is incompatible, both ecologically and from a quality of life perspective, with a rural setting. In addition, rural lands that had been eligible for zoning changes in trade for ESA Section 10 permit mitigation may no longer qualify.

Cost

According to ADOT’s own numbers, double decking Interstate 10 through Tucson would save \$2 billion versus the cost of creating a 56-mile section of interstate highway through the Avra Valley.

Other significant impacts may occur as a consequence

The CanaMex corridor will significantly reduce what little remains of private lands in Pima County. How much more of its tax base can Pima County afford to lose without dramatically increasing property taxes—again?

The Ironwood Forest National Monument designation is presently under Presidential review and may be repealed. If this occurs, environmental impacts from the CanaMex Corridor segment through Avra Valley will not be mitigated by the presence of the National Monument.

In fact, should the proposed CanaMex segment through the Avra Valley be approved, the Monument status may be repealed specifically to facilitate a straighter, faster and significantly less costly CanaMex Corridor. The same impacts would likely occur if the Sonoran Desert National Monument is repealed, and for the same reasons.

If either National Monument designation is repealed and replaced with the CanaMex Corridor, it is likely the area or areas currently in National Monument status would be targeted for rapid commercial development. The open pit Silverbell copper mine could also be significantly expanded.

Commercial development projects in areas currently designated as National Monuments would, of course, rapidly increase the tax base and significantly improve overall economic conditions in Pima County. The supply of domestic minerals such as copper would be more secure, which would in turn enhance national security.

On the other hand, the price would be lost quality of life, loss of high quality species habitat, loss of migratory species habitat, and potentially more species being listed as endangered.

Problems with Segments E and F

Corridor segment F traverses highly eroded and highly erodible portions of the Santa Cruz River and Brawley wash. The erosion, unstable soils and shifting streambed will present cost and reliability nightmares as the stream channel floods, deepens, widens, and continues head-cutting southward.

Moreover, Segment F touches the Los Robles Archaeological District, which is the northern tip of our District. The area is on the Register of Historic Landmarks and the site of a well-developed Hohokam village.

Construction activities alone will cause destruction of surface artifacts of the archaeological site and will expose important petroglyph sites to damaging air pollution in addition to new theft and vandalism.

In addition, Segment F will destroy the historical site of a century-old ranch and a one-room school, and destroy the historic home and force the eviction of the fourth generation ranching family that descended from Jack was, an important local historical cattleman and one the key people who founded the famous Tucson Rodeo and parade in 1925.

Moreover, the site was used as a Union Buffalo Soldier camp during the Civil War. It is also the site of the historic copper smelting ghost town of Sasco and the historic Atchison Topeka and Santa Fe railroad line that transported copper ore and people between Sasco and the Silverbell mine from 1906 to 1932.

In addition, an important riparian bird migration corridor would be severely degraded or destroyed

in the Santa Cruz, Brawley, and Los Robles watersheds.

Request for process inclusion

The planning process and this public comment period were insufficiently publicized. The core information and key facts to consider seem buried under piles of trivial documentation—certainly not easy to find on the ADOT website.

We have numerous District cooperators who are at risk of losing their homes, heritage and livelihoods, and yet were never contacted by ADOT. We request that they be contacted by ADOT through certified mail, and the comment period be reopened for no less than 90 days to give them an opportunity to know what plans are being laid for their futures. We assert that letting people know that their lives may be entirely uprooted would be the very minimal amount of courtesy ADOT ought to extend. The mainstream news media also failed to communicate adequately throughout this process.

We request that ADOT ensure the directly affected local citizens and the District be fully informed of any new process developments, opportunities for coordination between the District and ADOT, and public comment period announcements.

Sincerely,


Cindy Coping

Chair, Pima Natural Resource Conservation District



May 31, 2017

Mr. Jay Van Echo
I-11 Project Manager
Arizona Department of Transportation
1655 W. Jackson Street MD 126F
Phoenix, AZ 85007

Dear Mr. Van Echo:

Thank you for the opportunity to provide comment on Interstate 11 Corridor Tier 1 Environmental Impact Statement.

Pinal County prefers the alignment of the proposed corridor as reflected on both the Pinal Regionally Significant Routes and the Pinal Regional Transportation Authority Plans. Additionally, we support, the proposed route of the Sif Oidak District Administration and Planning & Economic Development Departments of the Tohono O'odham Community; as proposed and supported in Resolution No. SODC16-145 on November 17, 2016.

The Pinal County Board of Supervisors approved the Pinal County Open Space and Trails Master Plan (OSTMP) in October 2007. An updated Plan map is attached to this letter, and the entire document can be viewed here, <http://pinalcountyaz.gov/OpenSpaceTrails/Pages/KeyDocuments.aspx>

It is suggested that the OSTMP be included in the review and assessment of the I-11 routes. This review should include, but not be limited to, the following elements of the OSTMP:

- **Palo Verde Regional Park (Regional Park #4)**-Pinal County recently completed a Regional Park Cooperative Recreation Management Area Master Plan. (That document can be viewed here <http://pinalcountyaz.gov/OpenSpaceTrails/Pages/KeyDocuments.aspx>.) Palo Verde Regional Park will be a 23,200 acre multi-use park located along the western edge of Pinal County.
- The proposed **Anza National Historic Trail Corridor** through Pinal County. This multi-use historic trail is administered by the National Park Service. More than 40-miles of proposed trail run through Pinal County, acting as a vital link between Pima and Maricopa counties.
- Several segments of **planned regional trail** and **open space corridors** in the vicinity to potential corridor alignments.

Sincerely,

Kent A. Taylor, Director
Pinal County
Open Space and Trails Department

OPEN SPACE AND TRAILS