



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

Appendix H1, Standard Responses

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1 The following standard responses are intended to provide broad responses to the most
2 frequently raised issues and to supplement individual responses to comments.

3 GLOBAL

4 **GlobalTopic_1 Key Words: Avra Valley, Downtown Tucson, Pima** 5 **County**

6 **Frequent comment:** *Commenters expressed a desire to further evaluate alternatives within*
7 *Pima County and expressed opposition to the Recommended Alternative in Pima County.*
8 *These comments included concern for impacts to Avra Valley and Section 4(f) resources in*
9 *Downtown Tucson and the TMC.*

10 **Response GlobalTopic_1:** Based on technical analysis, and input from agencies, tribes, and
11 the public leading into the Draft Tier 1 EIS, FHWA and ADOT narrowed options in Pima County
12 to three: two western alternatives (Purple and Green) and one alternative (Orange) through
13 Pima County. The Draft Tier 1 EIS recommended the Green Alternative in Pima County.
14 Feedback on the Draft Tier 1 EIS requested more detailed environmental studies and
15 engineering for the I-11 Corridor in this area. FHWA and ADOT considered these comments
16 and modified the Preferred Alternative to carry forward both the west option (Recommended or
17 Green Alternative) and east option (Orange Alternative) in Pima County. Carrying both a west
18 and an east option forward allows ADOT to make a more informed decision after completing
19 detailed environmental and engineering studies in Tier 2. It also enables MPOs, local
20 governments, and other planning organizations to continue long-term planning strategies while
21 being responsive to public and agency concerns.

22 **GlobalTopic_2 Key Words: CantaMia, Gila River, Palo Verde**

23 **Frequent comment:** *Commenters expressed a desire for further alternative evaluation in the*
24 *Gila River area. Commenters also expressed their opposition to alternatives in and near the*
25 *CantaMia and Palo Verde communities (Purple Alternative) and their preference for the Green*
26 *Alternative (Option M-Q2) in the Central Section.*

27 **Response GlobalTopic_2:** After review of public and agency comments and obtaining new
28 information regarding the potential loss of irrigation runoff important to maintain habitat for the
29 endangered Yuma Ridgway's rail, FHWA and ADOT revised the Recommended Alternative
30 (Purple Alternative Options N and R) in this area. The Preferred Alternative in the Final Tier 1
31 EIS includes Green Alternative Option M, Green and Orange Alternatives Option Q2, and
32 Orange Alternative Option Q3 instead of Options N and R. The Preferred Alternative is partially
33 co-located with SR 85 and I-10, eliminating the need for new crossings of the Gila River and
34 Hassayampa River, thereby minimizing impacts to riparian and critical habitat, and federally
35 protected species in the area.



1 **GlobalTopic_3 Key Words: Editorial Changes, Minor Edits**

2 **Frequent comment:** *Commenters suggested minor edits or editorial changes to the Draft Tier 1*
3 *EIS.*

4 **Response GlobalTopic_3:** The requested correction is minor, editorial, or not pertinent to the
5 decision-making process. Some suggestions have been carried forward in the Final Tier 1 EIS.
6 The Draft Tier 1 EIS will not be updated.

7 **GlobalTopic_4 Key Words: End-to-End Alternatives, Opposition,**
8 **Support**

9 **Frequent comment:** *Commenters expressed support and opposition to the project as a whole*
10 *and/or support and opposition to an entire end-to-end alternative.*

11 **Response GlobalTopic_4:** The Final Tier 1 EIS documents the NEPA study completed to date,
12 culminating in the identification of the Preferred Alternative. This process included technical
13 analysis, coordination with study partners such as Cooperating Agencies, Participating
14 Agencies, and Tribal Governments, as well as the review and consideration of public input
15 received at study milestones. The Preferred Alternative is the result of balancing Stakeholder
16 input with the need to minimize natural and human environment impacts while meeting the
17 purpose of and need for the project. See Chapter 6 of the Final Tier 1 EIS for more detailed
18 explanation regarding the Preferred Alternative decision-making process.

19 **GlobalTopic_5 Key Words: Vista Royale, Wickenburg**

20 **Frequent comment:** *Commenters expressed concern that the project is too close to the Vista*
21 *Royale Neighborhood near Wickenburg.*

22 **Response GlobalTopic_5:** In response to comments received from the public and agencies,
23 the project team evaluated shifting the Recommended Alternative to the west such that I-11
24 would be located approximately 1.1 miles away from the homes in the Vista Royale
25 Neighborhood. This new alternative, the Preferred Alternative, would allow I-11 construction to
26 follow the natural terrain, while also protecting Desert Tortoise habitat. The Preferred Alternative
27 is shown on Figure I-1 in the Introduction and Reader's Guide of the Final Tier 1 EIS.

28 **GlobalTopic_6 Key Words: Floodplain Impacts, Green Alternative**
29 **(Option F) Refinement, Santa Cruz River**

30 **Frequent comment:** *Commenters expressed a desire for further evaluation of alternatives in*
31 *the Santa Cruz River area and suggested modifications to the Green Alternative (Option F).*

32 **Response GlobalTopic_6:** After review of public and agency comments voicing concern for
33 impacts to the Santa Cruz River, and coordination with USACE, the Preferred Alternative
34 contains a Green Alternative (Option F) Refinement. While much of the Recommended
35 Alternative was parallel to the River but not in it, a 12-mile segment immediately north of the
36 Pima-Pinal county line extended through the Santa Cruz River floodplain. The refinement is a
37 shift of the 12-mile segment northeast to minimize floodplain impacts. The shift in the corridor is
38 similar to Option E, an alternative considered during the alternatives development process but
39 originally eliminated from further consideration in the Draft Tier 1 EIS because the entirety of
40 Option E was longer in length and didn't attract as much traffic as the Recommended
41 Alternative. The refinement is incorporated into the Preferred Alternative and was evaluated

1 throughout the technical studies documented in the Final Tier 1 EIS. The results of the technical
2 evaluation showed the refinement minimizes impacts within the floodplain and does not
3 increase other impacts.

4 **GlobalTopic_7 Key Words: Central Section, Green Alternative**
5 **(Option F), Purple and Orange Alternatives (Option G)**

6 **Frequent comment:** *Commenters expressed a preference for the Purple and Green*
7 *Alternatives (Option G) that follow existing I-10 over Green Alternative (Option F) on new*
8 *location in the Central Section near Arizona City.*

9 **Response GlobalTopic_7:** The Preferred Alternative uses the Green Alternative (Option F)
10 west of I-10, which continues the northwest trajectory of the Green Alternative (Option D),
11 intersecting I-8 in the vicinity of Chuichu Road. The Green Alternative (Option F) provides an
12 alternate regional route to alleviate congestion and prevents bottlenecks during emergency
13 situations where there currently is no alternative route to I-10. It will attract and divert traffic from
14 existing roadways and is part of the end-to-end alternative that will reduce travel time between
15 Nogales and Wickenburg compared to the No Build Alternative.

16 The Purple and Orange Alternatives (Option G) would use the existing I-10 corridor, which has
17 enough capacity for projected future traffic volumes with I-11. However, the Purple and Orange
18 Alternatives (Option G) would not supply the alternate route that the Green Alternative (Option
19 F) would in an area where incidents and closures often occur and where there is a limited
20 transportation network off the interstate.

21 I-10 is a transcontinental corridor, and it is the only high-capacity transportation connection
22 between Arizona's two largest population centers—Phoenix and Tucson. This is a high-volume
23 highway, and when crashes, other incidents, or weather events occur, travel can be delayed.
24 Events that cause highway closures generally happen at random and with very little or no
25 warning. In the event of a full highway closure, mobility delays are not only inconvenient, they
26 present safety hazards for first responders and can have economic impacts to the trucking and
27 freight industry.

28 The Green Alternative (Option F) provides access to planned growth areas in Marana, Eloy, and
29 Casa Grande. It extends through areas that are vacant or agricultural today but that contain
30 planned growth areas around Marana and Eloy. The development of a new high-capacity
31 transportation facility connecting these growth areas is consistent with local and county-level
32 planning.

33 The Green Alternative (Option F) is near the Santa Cruz River and is closer to sensitive
34 environmental resources, notably the river's floodplains and riparian habitat. Land use in the
35 surrounding area is generally undeveloped and agricultural. Impacts to these resources would
36 be minimized and mitigated through Tier 2 design considerations, such as conveyance
37 structures for floodwaters, wildlife connectivity, and habitat impacts.

38 The Green Alternative (Option F) is part of an end-to-end alternative that reduces travel time
39 between Nogales and Wickenburg compared to the No Build Alternative and achieves LOS C or
40 better throughout I-11. As an alternate regional route, the Green Alternative (Option F) will
41 provide access to planned growth areas and serve key economic centers in Marana, Eloy, and
42 Casa Grande. Green Alternative (Option F) will attract and divert traffic away from existing

1 roadways and prevent bottlenecks during emergency situations. It is consistent with local and
2 county-level planning and commits to mitigation measures to minimize the impacts of the new
3 alignment on floodplains.

4 **GlobalTopic_8 Key Words: Tier 1, Tier 2, Tiering Process**

5 **Frequent comment:** Commenters expressed the belief that the selection of an alternative
6 during Tier 1 studies was premature and that more analysis is needed. Commenters also
7 inquired about the study process and whether additional studies would be conducted before
8 selecting a corridor.

9 **Response GlobalTopic_8:** FHWA is responsible for compliance with NEPA and related
10 statutes. FHWA and ADOT are following a tiered environmental process allowed under NEPA
11 for this I-11 Corridor Study. The Tier 1 EIS is an effective method for managing the NEPA
12 process across a large geographic area, following a programmatic approach for identifying
13 existing and future conditions and evaluating the comprehensive effects of the project on the
14 region. It allows the NEPA process to move forward with no identified funding, laying the
15 groundwork for where the corridor would be located. Currently ADOT does not have funding
16 identified in the Five-Year Program for the study, design, or construction of I-11.

17 A Tier 1 EIS consists of a programmatic and qualitative approach to identify an I-11 corridor
18 alternative that meets the purpose of and need for the project while minimizing the level of
19 environmental impact. The decision to be made at the conclusion of the Tier 1 EIS process
20 would be to select a 2,000-foot-wide Build Corridor Alternative that would advance to further
21 design and Tier 2 level NEPA analysis, or to select the No Build Alternative. Tier 2
22 environmental studies would be required to determine the specific alignment of I-11, including
23 design details and traffic interchange locations, and would evaluate more specific project-level
24 issues, such as individual property impacts, land use impacts, right-of-way needs, cost, and
25 mitigation measures. Tier 2 environmental studies could occur in phases, breaking up the
26 280-mile-long Nogales to Wickenburg corridor into interim projects or shorter segments, as
27 funding becomes available for further study, design, and construction.

28 The following table includes a summary of Tier 1 versus Tier 2:

	Tier 1 EIS	Tier 2 EIS, EA, or CE
Purpose and Need	<ul style="list-style-type: none"> Refine purpose and need from prior feasibility study Consider federal, state, regional, and local needs 	<ul style="list-style-type: none"> Refine purpose and need from Tier 1 Address needs specific to proposed project
Alternatives	<ul style="list-style-type: none"> Develop, evaluate, and screen corridor alternatives Identify types of proposed transportation facility 	<ul style="list-style-type: none"> Define project alignment and configuration Identify potential design options
Engineering	<ul style="list-style-type: none"> Conceptual design Typical sections for proposed transportation facility Phased Implementation Plan for smaller proposed projects 	<ul style="list-style-type: none"> More refined engineering Detailed drawings, vertical profiles, and typical sections Access details and interchange design

	Tier 1 EIS	Tier 2 EIS, EA, or CE
Analysis	<ul style="list-style-type: none"> Broad, high-level qualitative analysis Relies heavily on readily available information Primarily geographic information system (GIS) based 	<ul style="list-style-type: none"> Quantitative analysis Analyze site-specific resource information such as field surveys Determine project-specific impacts and mitigation
Agency and Public Input	<ul style="list-style-type: none"> Identify key issues early Build consensus 	<ul style="list-style-type: none"> Continue coordination with stakeholders, use relationships established during Tier 1 Identify specific concerns and resolutions
Proposed Action	<ul style="list-style-type: none"> Select Corridor Alternative (2,000 feet wide) Proposed transportation facility Phased Implementation Plan Mitigation strategies 	<ul style="list-style-type: none"> Select roadway alignment and configuration (400-feet or less interstate) Right-of-way needed Specific mitigation commitments

1

2 **GlobalTopic_9 Key Words: Comment Period, Extension**

3 **Frequent comment:** *Commenters requested the comment period for Draft Tier 1 EIS be*
4 *extended.*

5 **Response GlobalTopic_9:** The Errata to the Draft Tier 1 EIS was released on April 26, 2019.
6 This document provided additional information on the Preliminary Section 4(f) Evaluation for the
7 project contained in Chapter 4. To provide sufficient time for the public to review the Draft Tier 1
8 EIS and updated Chapter 4, the public comment period was extended to July 8, 2019, providing
9 95 days for public review from the Draft Tier 1 EIS initial release date of April 5, 2019. The 95-
10 day public review and comment period is more than twice the regulatory requirement of 45 days
11 as stated in 23 CFR 771.123(k).

12 **GlobalTopic_10 Key Words: Phoenix to Las Vegas Freeway**

13 **Frequent comment:** *Commenters expressed the belief that a freeway between Phoenix and*
14 *Las Vegas is needed ahead of the I-11 project.*

15 **Response GlobalTopic_10:** In 2015, the Fixing America’s Surface Transportation Act, or FAST
16 Act, formally designated I-11 throughout Arizona. It stated that the I-11 corridor will generally
17 follow SR 189 and I-19 from Nogales to Tucson, I-10 from Tucson to Phoenix, and US 93 from
18 Wickenburg to the Nevada state line. Accordingly, US 93 is envisioned to be the future I-11
19 corridor from the termini of this study in Wickenburg to the Nevada border and has future I-11
20 signs posted already. US 93 would need to be built to interstate standards.

21 Nevada DOT is advancing multiple segments of I-11 by continuing I-11 from US 93 at the
22 Arizona state line. The first is a two-phased construction project known as the I-11 Boulder City
23 Bypass connecting US 95/US 93 southeast of Las Vegas with the Hoover Dam Bypass Bridge.



1 The second is a Planning and Environmental Linkages (PEL) study for the segment between
2 the northwest edge of the Las Vegas metropolitan area and I-80 in western Nevada. The I-11
3 Corridor in northern Nevada generally follows US 95. However, the study is to determine the
4 most reasonable connection with I-80, between Reno/Sparks and the area north of Fallon,
5 Nevada.

6 **GlobalTopic_11 Key Words: Section 4(f) Net Benefit, TMC**

7 **Frequent comment:** *Commenters expressed disagreement with the proposed application of a*
8 *Section 4(f) Net Benefit Programmatic Evaluation for the TMC.*

9 **Response GlobalTopic_11:** The Draft Tier 1 EIS explained that the Recommended Alternative
10 would impact Bureau of Reclamation mitigation land, the TMC. At the time of the Draft Tier 1
11 EIS and based on initial consultation with Reclamation, the Section 4(f) Official with Jurisdiction
12 for the TMC, FHWA and ADOT proposed that the project could utilize the Net Benefit National
13 Programmatic Section 4(f) Evaluation for the use of the TMC. Since the Draft Tier 1 EIS,
14 Reclamation indicated that without additional analysis and mitigation they could not agree with
15 the application of the Net Benefit Programmatic Evaluation. Based on this input from
16 Reclamation, FHWA is no longer pursuing the Net Benefit Programmatic Evaluation in the Final
17 Tier 1 EIS.

18 **GlobalTopic_12 Key Words: Record of Decision (ROD)**

19 **Frequent comment:** *Commenters inquired about the purpose of a Tier 1 ROD.*

20 **Response GlobalTopic_13:** Assuming a build corridor alternative is chosen, the Tier 1 ROD
21 identifies the 2,000-foot-wide corridor, the high-level plan for the Tier 2 environmental studies,
22 and the commitments to be implemented by ADOT in advance of and during those studies.

23 The ROD provides a framework for integrating transportation planning with comprehensive land
24 use. Local governments can use the identified corridor to inform their land use planning process
25 and when making future development decisions.

26 The ROD does not prohibit development in the identified corridor but can be used to support
27 corridor preservation. ADOT can consider opportunities to buy right-of-way in the identified
28 corridor with non-federal funds prior to a Tier 2 project.

29 **GlobalTopic_13 Key Words: Tribal Sovereignty, Alternatives on or** 30 **near Tribal Land, and Coordination with Tribes**

31 **Frequent comment:** *Commenters expressed a concern regarding alternatives on or near Tribal*
32 *land or questioned how involved Tribal stakeholders were in the Tier 1 EIS process.*

33 **Response GlobalTopic_13:** Tribal community lands are subject to tribal sovereignty based on
34 the inherent authority of Native American tribes to govern themselves. States have very limited
35 authority over activities within tribal land. FHWA and ADOT do not have the authority to survey
36 tribal land, make transportation determinations directly affecting tribal land, or condemn tribal
37 land through an eminent domain process.

38 The current alignment of I-19 bisects Tohono O'odham Nation tribal land, and Pascua Yaqui
39 tribal land is located east of the I-10/I-19 system interchange. The Preferred Alternative (east



1 option) includes this section of I-19. Widening on I-19 in this area would occur in the median
2 between existing travel lanes, as shown on the concept engineering drawings in Appendix E1 of
3 the Draft Tier 1 EIS and would not require new land from the tribes. There are no other tribal
4 lands within the 2,000-foot-wide corridors of the Build Corridor Alternatives.

5 While efforts to study project alternatives on tribal land were attempted, the Tohono O'odham
6 Nation has not given permission to study or locate the build corridors on its land. Moving
7 forward, therefore, the build corridors cannot be located on the Tohono O'odham Nation. FHWA
8 and ADOT will continue to coordinate with the Tohono O'odham Nation regarding their concerns
9 and potential mitigation for those concerns. If in the future the Tohono O'odham Nation requests
10 a build corridor to be studied on tribal lands ADOT can include in the Tier 2 process an
11 evaluation of an alternative on Tribal lands.

12 FHWA and ADOT are committed to maintaining government-to-government relations with
13 Native American Tribes for projects in which tribes may have an interest. Tribal coordination
14 continues to be an integral part of this study. Tribes have been invited to attend agency and
15 stakeholder meetings throughout the process. Additional smaller meetings have been held with
16 the Ak-Chin Indian Community, Gila River Indian Community, Salt River Pima-Maricopa Indian
17 Community, Tohono O'odham Nation, Pascua Yaqui Tribe, and other tribal governments that
18 requested individual meetings. Input received during these meetings has led to new data
19 sources, helped refine corridor options, and helped to achieve general consensus on the
20 direction of the study's findings to date. Tribal input factored into the development and
21 evaluation of the Build Corridor Alternatives. Section 3.7 (Archeological, Historical, Architectural,
22 and Cultural Resources) provides more information on consultation under Section 106 of the
23 National Historic Preservation Act (NHPA), and Chapter 5 (Coordination and Outreach) provides
24 additional details on tribal coordination.

25 CHAPTER 1, PURPOSE AND NEED

26 PN-1 Key Words: Border Security, Nogales/Mariposa Port of Entry, 27 Homeland Security

28 **Frequent comment:** *Commenters expressed concerns with the Nogales/Mariposa Port of*
29 *Entry, border security, or expressed that they do not believe there is a connection between the*
30 *Homeland Security criteria and the I-11 project.*

31 **Response PN-1:** Homeland security as related to the I-11 project is a separate issue from
32 border security. The I-11 project does not address border security issues and the planned I-11
33 route connects north of the existing Nogales/Mariposa Port of Entry. The scope of the I-11
34 project does not address issues related to the Nogales/Mariposa Port of Entry such as hours of
35 operation or procedures nor the border wall.

36 As stated in Chapter 1 of the Draft Tier 1 EIS, I-11 should fulfill the need for alternate interstate
37 freeway routes and regional route redundancy to help alleviate congestion and prevent
38 bottlenecks during emergency situations. These routes may be parallel or may generally serve
39 the same major origin and destination points, with local or regional roads connecting the
40 freeways. Military facilities in the Phoenix and Tucson areas would benefit from alternate routes
41 for transporting personnel and equipment.



1 The original interstate freeway system was planned, in part, as a primary and necessary
2 element of the national defense system. One of the original purposes of the system was to
3 provide ground transportation for military supplies and troop deployments. The I-11 Corridor
4 may be an additional element of the Strategic Highway Network (STRAHNET), which is
5 designated by FHWA. The network is intended to provide defense access, continuity, and
6 emergency capabilities for movement of personnel and equipment in both peace and war. The
7 status of I-11 as an element of STRAHNET will be determined as I-11 moves out of this Tier 1
8 planning level analysis and moves forward into Tier 2 project level analysis.

9 **PN-2 Key Words: Alternative Route, Purpose and Need, Green**
10 **Alternative (Option D)**

11 **Frequent comment:** *Commenters expressed a belief that the Green Alternative (Option D) fails*
12 *to meet the purpose of and need of the project.*

13 **Response PN-2:** The purpose of and need for the I-11 project can be summarized into the
14 following high-level concepts: provides access to growth areas, reduces travel time, achieves
15 level of service (LOS), serves key economic centers, and provides an alternate route. The
16 Green Alternative (Option D) meets the purpose and need because it provides access to growth
17 areas identified in the PAG LRP, the result of traffic modeling for 2040 shows a reduction in
18 travel time compared to the No Build Alternative and achieving LOS C or better, serves existing
19 and emerging economic centers, and is an alternate route to I-10. A more detailed discussion of
20 the purpose and need for the I-11 project can be found in Chapters 1 and 6 of the Draft Tier 1
21 EIS.

22 **PN-3 Key Words: Need, Purpose**

23 **Frequent comment:** *Commenters expressed a belief that the project is a boondoggle – “work*
24 *or activity that is wasteful or pointless but gives the appearance of having value.”*

25 **Response PN-3:** As described in Section 1.5 of the Draft Tier 1 EIS, the need for the project
26 includes population and employment growth, traffic growth and travel time reliability, system
27 linkages and regional mobility, access to economic activity centers, and homeland security and
28 national defense.

29 FHWA and ADOT are working with study partners such as Cooperating Agencies, Participating
30 Agencies, and Tribal Governments, as well as other stakeholders including the public, to
31 advance the I-11 project. Prior studies and plans provide insight into the needs that have been
32 identified by ADOT, regional agencies, and local communities and lay the groundwork for the
33 concept of a new interstate in Arizona. More information about those studies can be found in
34 Section 1.4 of the Draft Tier 1 EIS.



1 **CHAPTER 2, ALTERNATIVES CONSIDERED**

2 **AC-1 Key Words: Alternate Routes, Existing Communities**

3 **Frequent comment:** *Commenters expressed a desire for the project to explore other routes*
4 *(not presented in the Draft Tier 1 EIS) using eastern or western alignments outside of the study*
5 *area or using other state routes to connect I-11.*

6 **Response AC-1:** The I-11 Study Area and subsequent routing options used to define the Build
7 Alternatives were derived from the Intermountain West Corridor Study (NDOT and ADOT 2014),
8 the I-11 Alternatives Selection Report (ADOT 2017g), and the I-11 project Purpose and Need.
9 The IWCS evaluated other routing options for the future corridor and concluded that the current
10 study area used in the Tier 1 EIS was the option that best met the study's criteria. See Draft Tier
11 1 EIS Chapters 1 and 2 for more information.

12 **AC-2 Key Words: Congestion, Natural Resources, Travel Time**

13 **Frequent comment:** *Commenters questioned whether the project weighs the value of reducing*
14 *congestion and travel time savings over the environment and people.*

15 **Response AC-2:** The decision-making process for the Preferred Alternative did not involve a
16 weighting scale. The purpose of and need for the project, such as reducing congestion and
17 improving travel efficiency, was considered along with the potential impacts to natural resources
18 and communities. The qualitative-level analysis completed for the Final Tier 1 EIS compared
19 how well the alternatives met the purpose and need, the level of natural and environmental
20 impacts, the ability to mitigate the negative impacts, and input from all project stakeholders in
21 order to determine the Preferred Alternative.

22 **AC-3 Key Words: Autonomous Vehicles, Emerging Technology**

23 **Frequent comment:** *Commenters expressed a belief that technology will soon transform how*
24 *we move goods and people. Widening through the No-Build or the Orange Alternatives are the*
25 *only options that lend themselves to technological advancements. Commenters expressed a*
26 *belief that technological advances will make I-11 obsolete. Emerging technologies, including the*
27 *addition of autonomous vehicles, will replace the need for large freeways and increased*
28 *capacity.*

29 **Response AC-3:** Freeway improvement projects, including widening the existing roadway, will
30 continue along the freeway network throughout the region as corridor needs arise and funding
31 becomes available. However, the I-11 project is needed for a variety of reasons as described in
32 Chapter 2 of the Draft and Final Tier 1 EIS. The needs for the project included population and
33 employment growth, traffic growth and travel time reliability, system linkages and regional
34 mobility, access to economic activity centers, and homeland security and national defense. It
35 was determined that a new freeway facility is needed to address these needs.

36 The Draft Tier 1 EIS environmental resource analysis did not evaluate emerging technologies
37 that may use the transportation corridor. In the future, emerging technologies such as
38 autonomous/connected vehicles and truck platooning, may impact traffic volumes, travel times,
39 average speeds, and safety, which could impact the corridor footprint or defer some capacity
40 improvements. Over time the statewide and regional travel demand models would be
41 recalibrated to account for these travel trends and technological advances. For example, if one



1 of these emerging technologies becomes a dominant travel trend before I-11 is constructed, the
2 Tier 2 environmental studies would use data from the travel demand modeling and travel
3 patterns with this technology accounted for. The results of the modeling would inform the future
4 location and design needs of a Build Alternative. For additional information about how
5 technological advances may affect the need for I-11, see Section 2.5 of the Draft Tier 1 EIS.

6 **AC-4 Key Words: Land Investors, Lobbyists, Politics**

7 **Frequent comment:** *Commenters expressed a belief that the project is the result of payoffs*
8 *from lobbyists and wealthy land investors wanting to make money developing along the*
9 *proposed freeway. Commenters also expressed concern that project alternative selection will be*
10 *influenced by political pressure. They fail to see strong analyses to support the conclusions*
11 *justifying the Preferred Alternative. Commenters believe political pressure from private*
12 *companies and developers are to blame for the Draft Tier 1 EIS outcomes.*

13 **Response AC-4:** The purpose and need, as detailed in Chapter 1 of the Final Tier 1 EIS, for the
14 project identified the following:

- 15 • High-growth areas need access to the high-capacity, access-controlled transportation
16 network.
- 17 • Increased traffic growth reduces travel time reliability due to unpredictable freeway
18 conditions that impede travel flows and hinder the ability to move people and goods around
19 and between metropolitan areas efficiently.
- 20 • The lack of a north-south interstate freeway link in the Intermountain West constrains trade,
21 reduces access for economic development, and inhibits efficient mobility.
- 22 • Efficient freeway access and connectivity to major economic activity centers are required to
23 operate in a competitive economic market.
- 24 • Alternate interstate freeway routes and regional route redundancy help alleviate congestion
25 and prevent bottlenecks during emergency situations.

26 Economic growth in Arizona has caused increased urban development activities within the
27 Phoenix and Tucson metropolitan areas, which includes suburban communities such as
28 Sahuarita, Marana, Goodyear, and Buckeye. Most cities, towns, and counties already have
29 adopted local general or comprehensive plans to manage growth and development within their
30 jurisdictions. Within Maricopa and Pinal Counties, many adopted plans and transportation
31 studies already contemplate the addition of an access-controlled transportation facility. Land
32 speculation is likely to continue as developable land on the urban fringes is bought and sold.

33 While prior studies and governmental plans provide insight into some of the issues and needs
34 identified for the project and were evaluated, the NEPA study is not a political process. FHWA
35 and ADOT are working with numerous stakeholders as part of the I-11 Tier 1 EIS process.
36 Those in elected positions are project stakeholders and their input is considered at the same
37 level as all other stakeholder input.

38 Federal agencies, state agencies, local agencies, and tribal governments were invited to be
39 Cooperating or Participating Agencies for the I-11 Tier 1 EIS. These stakeholders have been



1 involved throughout the NEPA process, commented on the EIS, and continue to relay concerns
2 and provide direction that contribute to the EIS decision-making process. Members of the public
3 are also stakeholders in the I-11 NEPA process. FHWA and ADOT have implemented a robust
4 public outreach effort including public meetings at scoping, alternatives development, and
5 hearings for the Draft Tier 1 EIS. The public input received during the study process informed
6 the FHWA and ADOT decision-making on this project. More information about the role of the
7 different stakeholders, who was invited to be cooperating and participating agencies, and the
8 outreach efforts can be found in Chapter 5 of the Draft and Final Tier 1 EIS.

9 **AC-5 Key Words: Economic Savings**

10 **Frequent comment:** *Commenters expressed that the Orange Alternative would save taxpayer*
11 *dollars the most over the Recommended, Green, and Purple Alternatives.*

12 **Response AC-5:** The purpose of I-11 is to provide a high-priority, high-capacity, access-
13 controlled transportation corridor to serve population and employment growth; support regional
14 mobility; connect metropolitan areas and markets; enhance access to support economic vitality;
15 and provide regional route redundancy for emergency and defense purposes. If I-11 is not
16 constructed, there are cost savings in the form of construction and maintenance costs.
17 However, the No Build Alternative would have maintenance costs associated with the upkeep of
18 existing roads.

19 A preliminary economic impact analysis was conducted to anticipate the response of the
20 regional economy to changes in demand, income, and employment as a result of the No Build
21 and Build Corridor Alternatives. See Section 3.6 of the Draft Tier 1 EIS for more information.

22 **AC-6 Key Words: No Build Alternative**

23 **Frequent comment:** *Commenters expressed that the No Build Alternative is the only*
24 *alternative that will protect the pristine and unique Arizona desert and is the only alternative that*
25 *will not contribute to climate change and the growing water scarcity.*

26 **Response AC-6:** The No Build Alternative was included in the Tier 1 EIS to compare impacts of
27 the other build alternatives with the consequences of doing nothing. It is important to note that
28 impacts can result from choosing to do nothing. The impacts associated with the No Build
29 Alternative are discussed in each section of Chapter 3 in the Draft and Final Tier 1 EIS.

30 The No Build Alternative would not address the needs outlined in Chapter 1 of the Draft and
31 Final Tier 1 EIS. Travel times between Nogales and Wickenburg would not be improved and
32 regional mobility would not be improved for people or goods. FHWA and ADOT have identified a
33 Preferred Alternative that is a Build Corridor Alternative. More information on the basis for this
34 decision is contained in Final Tier 1 EIS Chapter 6.

35 **AC-7 Key Words: Current Highways, Poor Maintenance**

36 **Frequent comment:** *Commenters suggest spending the money to fix and maintain the current*
37 *transportation infrastructure that is crumbling instead of adding a new facility that will likely fall*
38 *into disrepair.*

39 **Response AC-7:** The NEPA study process evaluates needed capacity improvements and the
40 cost to build those improvements. The cost estimates include the maintenance costs over the



1 design horizon, or 20 years from opening. Section 6.6, Tables 6-5 and 6-6 of the Final Tier 1
2 EIS detail the current cost estimate including maintenance.

3 ADOT identifies funding needs for highway maintenance throughout the state for existing and
4 planned roadways in the ADOT Five-Year Program.

5 **AC-8 Key Words: Expense, Minimal Time Savings**

6 **Frequent comment:** *Commenters expressed a belief that the minimal travel time savings does*
7 *not justify the expense of the project.*

8 **Response AC-8:** As described in Section 1.1.1 of the Final Tier 1 EIS, the purpose of I-11 is to
9 provide a high-priority, high-capacity, access-controlled transportation corridor to serve
10 population and employment growth; support regional mobility; connect metropolitan areas and
11 markets; enhance access to support economic vitality; and provide regional route redundancy
12 for emergency and defense purposes.

13 End-to-end travel times would be much faster under any of the build alternatives compared to
14 the No Build Alternative. Specifically, the Recommended Alternative has a 21 percent reduction
15 in travel time during peak travel periods and the Preferred Alternative with west and east option
16 has reductions of 21 percent and 16 percent, respectively. Chapter 1 of the Draft Tier 1 EIS and
17 Section 6.5.2 of the Final Tier 1 EIS compare the purpose and need metrics for the project.
18 Travel times, while an important project need, is not the only one as there are other measures
19 that this project would benefit as well. Population and employment growth continue throughout
20 the region, and new roadways are needed to provide access and mobility in these fast-growing
21 communities. Additionally, travel time reliability is needed for the trucking industry and system
22 redundancy is needed for homeland security and national defense.

23 **AC-9 Key Words: Freight, Commuter Rail**

24 **Frequent comment:** *Commenters suggested the addition of a rail between Tucson, Phoenix,*
25 *and Las Vegas as a means of removing freight vehicles or passenger traffic from the existing*
26 *freeway system to allow for free flow freight traffic.*

27 **Response AC-9:** The scope of this Tier 1 EIS addresses a proposed highway facility and as
28 such the EIS analyzes the potential impacts and benefits attributed to the I-11 project limited to
29 vehicular transportation. While freight movement is a portion of the travel demand, the Purpose
30 and Need for I-11 is driven by overall population and employment growth. Modal alternatives
31 were considered but were not carried forward for detailed evaluation into the Draft Tier 1 EIS.
32 As I-11 is intended to extend from Mexico to Canada, opportunities for highway, rail, and utilities
33 may be located in the same corridor. The analysis in this Draft Tier 1 EIS considers available
34 space, within an assumed typical cross section, that may be used for rail or utility co-location if
35 this infrastructure is implemented in the future.

36 The type of mode by which goods are shipped depends on a combination of several logistical
37 factors: the distance of transport, the types of cargo, and the destinations. Freight rail does not
38 address the logistical needs of moving the freight that is currently transported by trucks.
39 FHWA's and ADOT's outreach with Class 1 railroads during the scoping process for this Tier 1
40 EIS revealed that major capacity investments for freight rail are already underway, and upon
41 completion, Arizona freight rail corridors will have adequate rail capacity for the foreseeable
42 future. Rail facilities and services already exist within the Study Area and/or have been studied



1 as part of several statewide planning efforts. Additionally, the Federal Railroad Administration
2 (FRA) completed the Southwest Multi-State Rail Planning Study in 2014, which evaluated high-
3 speed rail connections within the Intermountain West. The preliminary network vision proposed
4 a high-speed connection from Phoenix to Los Angeles, with connectivity from Los Angeles to
5 Las Vegas and points north in California.

6 The ADOT and FRA Arizona Passenger Rail Corridor Study was completed in 2016. A Final
7 Tier 1 EIS and Record of Decision selected a proposed intercity passenger route connecting
8 Tucson and Phoenix, with future opportunities to extend the route south to Nogales. The
9 Selected Corridor Alternative would parallel I-10 to Eloy and then divert north, entering Phoenix
10 from the east. With local and regional transit systems in place within the Study Area, additional
11 passenger rail capacity is not warranted at this time. In addition, FRA is a Cooperating Agency
12 on the I-11 study.

13 SECTION 3.3, LAND USE AND SECTION 6(F)

14 LU-1 Key Words: Property Acquisition, Compensation, Eminent 15 Domain, Property Value

16 **Frequent comment:** *Commenters expressed concern surrounding the fragmentation or*
17 *destruction of land and homes where the Recommended Alternative is designated to go.*
18 *Commenters also expressed concern that residential property values along the corridor will be*
19 *negatively impacted. Commenters questioned how the buying process would happen and when*
20 *it would take place.*

21 **Response LU-1:** Specific impacts to individual parcels of land will be identified during the Tier 2
22 study process when a specific roadway alignment (approximately 400 feet wide or less) and
23 proposed right-of-way needs are determined. When determining the specific alignment of I-11 in
24 Tier 2, measures to avoid and minimize property acquisitions will be considered. Future Tier 2
25 projects would address specific effects to property, zoning regulations, neighborhoods, and
26 community facilities.

27 ADOT is not currently acquiring right-of-way for I-11. ADOT does not anticipate acquiring right-
28 of-way until after the Tier 2 environmental process is complete and funding for the project is
29 authorized. Early acquisition of property prior to completion of the environmental review process
30 is regulated under 23 CFR 710.501. There is no specific timing for the Tier 2 process as there is
31 currently no funding for the future planning, design, right-of-way needs, environmental studies,
32 or construction for I-11.

33 Federal and state relocation and acquisition guidelines, in compliance with the Uniform
34 Relocation Assistance and Real Property Acquisition Policies Act of 1970 (Uniform Act), will be
35 followed to ensure fair compensation for all properties acquired within the proposed right-of-way
36 during Tier 2. Compliance with the Uniform Act ensures that property owners are compensated,
37 receive fair market value for their property and relocation benefits, and that displaced persons
38 receive fair and equitable treatment.

39 Eminent domain is a property acquisition process completed in compliance with the Uniform
40 Act. It is typically only used when other acquisition methods have failed. ADOT will not acquire
41 property as part of the Tier 1 EIS and therefore will not use eminent domain at this time. Use of



1 eminent domain for property acquisition could occur as part of future Tier 2 projects, if
2 necessary, and will be determined at that time.

3 The Tier 1-level study does not include the detailed information needed to estimate the impacts
4 to personal property values (depreciated or appreciated) related to the I-11 corridor. Numerous
5 studies have been done on the effects of new roads on property values, and in general, results
6 have varied but with an underlying consensus that many variables contribute to property values.
7 The relationship between the transportation infrastructure and residential property values is well
8 documented (*Transportation Research Record: Journal of the Transportation Research Board*,
9 No. 2174, Transportation Research Board of the National Academies, Washington, D.C., 2010,
10 pages 138–47; “Impact of Highways on Property Values: Case Study of the Superstition
11 Freeway Corridor”).

12 The Draft Tier 1 EIS evaluated impacts to planned land use and master planned communities
13 (Figure 3.3-2 and Figure 3.3-3) and evaluated areas of growth (Figure 1-4 and Figure 1-5). Tier
14 2 studies will evaluate impacts to specific properties as specific roadway alignment alternatives
15 are developed.

16 **LU-2 Key Words: Affected Properties, Online Mapping**

17 **Frequent comment:** *Commenters inquired about the accuracy of the online maps.*
18 *Commenters questioned how to determine whether their property would be affected.*

19 **Response LU-2:** There is an online interactive map available for use to determine how close
20 the corridor is to your home. The interactive map, located at
21 <http://i11study.com/Arizona/Map.asp>, provides users with the opportunity to locate their property
22 using the search engine.

23 **LU-3 Key Words: Rural Character, Sprawl**

24 **Frequent comment:** *Commenters expressed concern that the project would impact the current*
25 *rural character of the region and create urban sprawl and development.*

26 **Response LU-3:** Protection of rural character and prevention of new development is not
27 determined by the Tier 1 EIS. Adopted general or comprehensive plans, within each jurisdiction,
28 determine land use and development areas.

29 Sprawl is the unrestricted growth in urban areas of housing, commercial development, and
30 roads over large expanses of land, due to many issues. In addition, the term also relates to the
31 social and environmental consequences associated with this uncontrolled development.
32 Community comprehensive plans and the resulting zoning ordinances developed and approved
33 by local governments and their citizens dictate where low- and high-density development will
34 occur. The low-density development, usually a distance outside the urban core, leads to
35 residents traveling more. As development and growth continue, the demand increases, roadway
36 congestion increases, and this creates the demand for more roads or increased capacity of
37 existing roads and other transportation modes.

38 Over time, urban expansion in Arizona will occur with or without I-11 because of continued
39 population growth and development. Urban expansion could encroach on portions of land that
40 are currently rural or undeveloped. Anticipated changes would have beneficial and adverse
41 impacts on land use, transportation, and rural areas. Similarly, the visual character and quality



1 in the area of visual effect (AVE) would change with or without I-11 because of continued
2 urbanization especially in Tucson, Casa Grande, and Phoenix. Urban expansion could encroach
3 on portions of the AVE that are currently rural or undeveloped, leading to a more urbanized
4 character. Anticipated changes would have beneficial and adverse impacts on the visual quality.
5 The visual character and quality of new development would depend on what is constructed.
6 Future land use and development, as permitted by local jurisdictions, may or may not be
7 harmonious with the existing visual elements and patterns.

8 As described in Chapter 3 of the Final Tier 1 EIS, land development is dictated by local land use
9 plans and transportation studies, like the I-11 Tier 1 EIS, are in response to future growth as
10 indicated by these local plans. Once a transportation facility is in place, other changes occur.
11 The Build Corridor Alternatives would have land use impacts, both positive and negative,
12 including the potential to encourage commercial and industrial development in locations near
13 interchanges and to increase development density in those areas. The actual effects and their
14 magnitude cannot be adequately determined at the Tier 1 level; they will largely depend on the
15 timing of future construction and other factors, such as the overall rate of urban development
16 within the Study Area. A future Tier 2 assessment would use more detailed alignment
17 information and an updated travel demand model delineating population and employment
18 projections combined with a review of planned/entitled private developments to determine the
19 interchange locations most suitable for ensuring transportation system safety and mobility, as
20 well as access needs.

21 **LU-4 Key Words: Land Use Plans, Local Data**

22 **Frequent comment:** *Commenters inquired about local land use plans and local data used as*
23 *well as the location of the information.*

24 **Response LU-4:** The adopted general or comprehensive plans, which are approved by the
25 public and local governments, were used as sources of information and can be found on each
26 local governments' website. Local plans and ordinances, along with private development plans,
27 were consulted to establish the affected environment, environmental consequences, and
28 proposed mitigation measures. Land use trends, goals, and objectives of relevant city, county,
29 and regional plans were reviewed to determine whether construction of I-11 would be consistent
30 with these jurisdictions' applicable goals and policies. Potential impacts to special land
31 management designations also were reviewed. Other sources of information include Maricopa
32 Association of Governments (MAG) and Pima Association of Governments (PAG). A list of
33 plans and documents reviewed for this study can be found in Appendix E3, Land Use and
34 Section 6(f) Technical Memorandum of the I-11 Draft Tier 1 EIS and in Section 3.3 of the Final
35 Tier 1 EIS.

36 **LU-5 Key Words: Special Land Designations**

37 **Frequent comment:** *Commenters expressed concern that the project proposes the use of*
38 *resources in a manner that conflicts with the Special Land Designations.*

39 **Response LU-5:** Special Designated Lands, which are federally protected, include national
40 monuments and wilderness areas. Section 3.3 of the Draft and Final Tier 1 EIS discusses land
41 use and policies and special designated lands within the I-11 corridor study area. Special
42 Designated Lands were avoided in the development of the build alternatives except for the
43 Tucson Mitigation Corridor and use of federal land manager-identified multiuse areas.



- 1 The ultimate decision regarding the potential use of the TMC will be determined at Tier 2.
2 Continued evaluation of the impacts to these lands as well as coordination with the federal
3 agencies who oversee these lands will occur during future Tier 2 studies.

4 **LU-6 Key Words: Eminent Domain, Green Valley**

5 **Frequent comment:** *Commenters expressed opposition to the destruction of Green Valley, a*
6 *55+ community, in a currently rural part of southern Arizona with no economic need for a*
7 *freeway.*

8 **Response LU-6:** Future Tier 2 projects for the co-location of I-11 with I-19 would not require
9 additional right-of-way and would address specific effects to property, zoning regulations, noise,
10 neighborhoods, or community facilities as necessary.

11 **SECTION 3.4, RECREATION**

12 **R-1 Key Words: Parks**

13 **Frequent comment:** *Commenters expressed concern about recreational properties and parks*
14 *that are located within the corridors.*

15 **Response R-1:** Several agency and public comments identified numerous local resources by
16 name. The 2,000-foot-wide build corridors were located based on a qualitative Tier 1 analysis
17 and previous studies within the study area, and were refined to minimize impacts to resources,
18 including local parks. Although efforts were made to avoid impacts to publicly owned recreation
19 areas, some are located within, adjacent, or near the 2,000-foot-wide build corridor alternatives.
20 Potential impacts to recreation areas could include increased noise, air quality issues, light
21 pollution, impacts to scenic views, changes in local wildlife presence, and other direct and
22 indirect impacts. Additional information about the potential impacts on recreational resources
23 can be found in Section 3.4 of the Draft and Final Tier 1 EIS.

24 Identification of a recreational resource within the 2,000-foot-wide preferred corridor does not
25 equate to direct impacts or loss of the resource. Future Tier 2 studies will evaluate roadway
26 alignments, approximately 400 feet wide or less, within the 2,000-foot-wide corridor. During that
27 project-level design, recreational resources can potentially be avoided, or the impacts minimized
28 as well as implement resource-specific mitigation measures. Recreation resources outside of
29 the 2,000-foot wide corridor will not be directly impacted, but indirect impacts may require
30 evaluation and mitigation as part of future Tier 2 analysis as well.

31 **R-2 Key Words: National Monuments, National Parks**

32 **Frequent comment:** *Commenters expressed concern about how the project might impact the*
33 *National Parks or National Monuments in the study area, including Saguaro National Park and*
34 *Ironwood Forest National Monument.*

35 **Response R-2:** The Build Corridor Alternatives were developed specifically to avoid directly
36 impacting previously designated protected areas. Examples of these types of areas include
37 national parks, national monuments, sovereign tribal lands, designated wilderness areas, and
38 designated roadless areas. The Build Corridor Alternatives do not overlap or require land from
39 Saguaro National Park, Ironwood Forest National Monument, or Sonoran Desert National

1 Monument. There is the potential for indirect impacts to them such as increased noise and
2 visual intrusion as detailed in Section 3.17 of the Final Tier 1 EIS. The quantitative evaluation of
3 the indirect impacts to these properties will occur in Tier 2 when the alignment locations and
4 location-specific mitigation are identified.

5 SECTION 3.5, COMMUNITY RESOURCES, TITLE VI, AND 6 ENVIRONMENTAL JUSTICE

7 EJ-1 Key Words: Community Resources, Low Income, Minority, 8 Environmental Justice

9 **Frequent comment:** *Commenters expressed concern that the project would impact a low-*
10 *income and/or minority community in terms of air quality, displacements, and disruption of*
11 *community cohesion.*

12 **Response EJ-1:** At the onset of the Draft Tier 1 EIS study process, the team attempted to avoid
13 dense concentrations of residential areas thereby minimizing or eliminating impacts to
14 communities in the development of the Build Corridor Alternatives. The study identified areas
15 and communities where potential impacts could occur to community facilities, community
16 cohesion, and communities with higher concentrations of low-income or minority individuals
17 than the surrounding areas for each Build Corridor Alternative. Higher concentrations are
18 defined as areas with populations of low-income and/or minority individuals that either exceed
19 50 percent of the total population or are greater than or equal to the county percentages. A
20 qualitative Tier 1-level analysis was completed (Section 3.5, Tables 3.5-1 and 3.5-3 in the Final
21 Tier 1 EIS). A more definitive community impact assessment will be completed in Tier 2 to
22 identify where specific potential impacts may occur to communities when detailed information is
23 known about the potential future alignment location and design of the facility.

24 Under NEPA, FHWA has a regulatory obligation to identify and address disproportionately high
25 and adverse effects of federal projects on the human health or environment of low-income and
26 minority populations to the greatest extent practicable and permitted by law. Therefore, future
27 Tier 2 NEPA analysis will include an assessment of potential impacts at specific locations and to
28 specific communities.

29 EJ-2 Key Words: Environmental Justice

30 **Frequent comment:** *Commenters expressed concern that the Tier 1 EIS did not identify their*
31 *community as minority and/or low income.*

32 **Response EJ-2:** The Tier 1 environmental justice analysis relied on US Census Bureau data to
33 provide a high-level inventory of community demographics. Census data aggregate
34 demographics into larger geographies, which can sometimes mask smaller pockets and
35 neighborhoods of protected populations. Tier 2 study recommendations described in the Final
36 Tier 1 EIS include development of a more detailed community profile for potentially impacted
37 communities. When more detailed analyses based on location-specific impacts are completed
38 during Tier 2 studies, they would use additional data sources and assess communities and
39 individual neighborhoods.



1 **SECTION 3.6, ECONOMIC IMPACTS**

2 **E-1 Key Words: Downtown Tucson, Economics**

3 **Frequent comment:** *Commenters expressed concern that businesses in downtown Tucson will*
4 *be negatively impacted by traffic diversion.*

5 **Response E-1:** The Arizona Statewide Travel Demand Model, which estimates short- and long-
6 distance travel for passenger vehicles and commercial trucks through 2040, shows that traffic
7 will remain the same in downtown Tucson and traveler services will continue to be needed even
8 if I-11 is not co-located with I-19/I-10. The model shows no change to the traffic forecast on I-10,
9 no change to trips produced or attracted to downtown Tucson, and no change to the population
10 or jobs within a 45-minute commute of downtown Tucson. The updated model and Level of
11 Service are further discussed in Chapter 1 of the Final Tier 1 EIS.

12 **E-2 Key Words: Economic Impacts, Saguaro National Park**

13 **Frequent comment:** *Commenters expressed concern that tourist attractions such as the*
14 *Saguaro National Park may become less attractive and lose visitors. Commenters expressed*
15 *that the value of recreation needs to be considered from an economic standpoint. There could*
16 *be large local impact in the form of tourism dollars.*

17 **Response E-2:** The economic impact analysis qualitatively considered the impact on outdoor
18 and wildlife-related recreation and national parks, such as SNP. The Build Corridor Alternatives
19 may have positive or negative effects on these resources. The Preferred Alternative would open
20 access and make it easier for more people to visit the region and its parks. Alternatively, it could
21 deter park visits and economic contributions from outdoor enthusiasts by reducing the rural
22 character of the parks or diminishing the visitor experience of the parks. For more information
23 on the economic analysis and tourism, see Chapter 3.6 of the Draft Tier 1 EIS.

24 Identification and quantification methodologies of specific activities on recreation lands will be
25 completed and coordinated with appropriate agencies as part of the Tier 2 analysis (see
26 Chapter 7 of the Final Tier 1 EIS). Facilities such as SNP and their use will be inventoried, and
27 the project design can be modified to avoid, minimize, or mitigate impacts.

28 **E-3 Key Words: Cost, Economics**

29 **Frequent comment:** *Commenters expressed that the cost of the project is too high compared*
30 *to the cost of other options, such as improvements to I-19 and I-10.*

31 **Response E-3:** The capital cost of the project is one component of the analysis and decision-
32 making process. The results of the analysis show that the project could generate up to \$12.2
33 billion in gross regional product during the construction phase and the operational phase for the
34 Recommended Alternative and between \$9.6 and \$11.7 billion for the Preferred Alternative with
35 the west option and east option, respectively. See the Final Tier 1 EIS Section 3.6 and Section
36 6.6 for the Preferred Alternative cost.

37 **E-4 Key Words: Economics, Economic Centers**

38 **Frequent comment:** *Commenters expressed concern surrounding the economic data*
39 *presented in the Draft Tier 1 EIS. They felt it contradicted other economic studies, did not agree*

1 with the identification of economic centers, and the analysis was conducted for the purpose of
2 justifying the freeway.

3 **Response E4:** An interstate freeway facility would provide improved access and connectivity to
4 major employment areas, economic development opportunities, warehouse/distribution facilities,
5 and airports, all of which depend upon freeway access to operate in a competitive economic
6 market. A high-capacity transportation facility connecting Nogales, Wickenburg, and other
7 destinations in between would make long-distance travel quicker, easier, and more direct.
8 Improved interstate freeway access would serve the existing and emerging economic centers in
9 the Study Area, which were updated on Figure 1-4 and explained in Section 1.2.2 in the Final
10 Tier 1 EIS.

11 In-person interviews were conducted with economic development, planning, public works, and
12 management representatives of local jurisdictions within the Study Area to understand the
13 potential impact that the Build Corridor Alternatives would have on land use, community, and
14 economic development. Input was solicited on a range of topics, including current economic
15 drivers, industry targets, locations of existing and future employment centers, changes in land
16 use or economic development resulting from I-11, and the potential support that new highway
17 interchanges and other transportation improvements (e.g., accessibility) might provide to
18 industrial, retail, or service businesses (see Appendix E6 of the Draft Tier 1 EIS for more
19 information).

20 The economic impact analysis was conducted using ADOT's Regional Economic Models, Inc.
21 (REMI) TranSight model (a commercial analysis tool licensed to ADOT). This is a widely applied
22 economic impact analysis model used to evaluate the effects of transportation investments and
23 policies at the regional level. REMI TranSight is a dynamic forecasting model that accounts for
24 changes in demographic and economic conditions (e.g., changes in prices and wages) over
25 time.

26 The population and employment projections documented in the Draft Tier 1 EIS are from the
27 Arizona Statewide Travel Demand Model, which forecasts future conditions based on data from
28 the state's metropolitan planning organizations and the Arizona State Demographer's Office.

29 All the above sources of economic data are standard resources using standard industry
30 practice.

31 **SECTION 3.7, ARCHAEOLOGICAL, HISTORICAL,** 32 **ARCHITECTURAL, AND CULTURAL RESOURCES**

33 **CR-1 Key Words: Undiscovered Cultural Resources**

34 **Frequent comment:** *Commenters questioned how potential project impacts on yet*
35 *undiscovered cultural resources will be considered.*

36 **Response CR-1:** The Draft Tier 1 EIS indicated that FHWA and ADOT adopted a phased
37 approach to inventory, evaluate, and assess effects to cultural resources (including
38 archaeological sites, historic structures, historic districts and buildings, and traditional cultural
39 properties) listed in or eligible for the National Register of Historic Places. A phased approach is
40 consistent with regulations implementing the National Historic Preservation Act when alternative



1 corridors are being considered (36 CFR 800.4(b)(2)). The Tier 1 EIS analysis used information
2 collected from Section 106 consulting parties, including the SHPO and THPOs, and compiled by
3 prior studies to estimate the type and number of cultural resources that might be affected, and
4 preliminarily evaluated the National Register eligibility of unrecorded historic-period properties.
5 This information was used during the Tier 1 evaluation process in an attempt to minimize future,
6 Tier 2 impacts. This information was compiled in Class I Reports and supplements that were
7 consulted on and concurrence received from SHPO, ACHP, and all landowners in January
8 2021. Although the estimates are approximations, the analysis provided adequate information to
9 consider and compare the potential level of effect of the Build Corridor Alternatives on cultural
10 resources. That information was considered, along with many other factors, in selecting the
11 Preferred Alternative. The process for inventorying and evaluating cultural resources used to
12 assess and address the impacts of Tier 2 projects as they are identified and designed is
13 described in the draft final Project Section 106 Programmatic Agreement (see Appendix E7 of
14 the Final Tier 1 EIS). The final draft Tier 1 Section 106 programmatic agreement (PA) was
15 distributed to consulting parties on May 5, 2021 for final review and comment. Consultation is
16 ongoing. The final draft PA, attached in Appendix E7, reflects Section 106 consultation to date.
17 If the PA is not executed before the Tier 1 EIS Record of Decision is issued, it may be executed
18 subsequently. Construction on Tier 2 projects would not proceed until appropriate Section 106
19 agreement documents are executed. If historic properties are discovered during the Tier 2
20 process, measures to avoid, minimize, and mitigate impacts will be implemented, including
21 possible adjustments to alternative alignment locations.

22 SECTION 3.8, NOISE

23 N-1 Key Words: Noise Impacts

24 **Frequent comment:** *Commenters expressed concern about noise impacts resulting from the*
25 *project.*

26 **Response N-1:** The FHWA highway traffic noise regulation, 23 CFR 772, constitutes the official
27 federal highway noise standards, which include noise abatement criteria for different types of
28 land uses and human activities, and require the consideration of noise abatement mitigation
29 when traffic noise impacts that exceed a defined threshold are identified. In addition, FHWA and
30 ADOT are required to follow the current ADOT Noise Abatement Requirements (Noise Policy),
31 which provides the following during Tier 2 when the planning and design of a highway project
32 take place:

- 33 • Identification of traffic noise impacts and examination of potential mitigation measures
- 34 • Incorporation of reasonable (resident/owner preferences, noise reduction goals, cost
35 effectiveness) and feasible (engineering and acoustic) noise mitigation measures into the
36 highway project
- 37 • Coordination with local officials to provide helpful information on compatible land use
38 planning and control

39 The noise analysis completed for the Tier 1 EIS identified all noise sensitive receivers and land
40 uses. Noise measurements were taken to adequately represent existing noise levels. The TNM
41 Noise Model was used to predict 2040 projected noise levels throughout the corridor and



1 included noise levels adjacent to residential, parks, and recreational areas. The data are
2 presented in Section 3.8 of the Final Tier 1 EIS.

3 The Tier 2-level noise analysis will require updated noise measurements and more detailed
4 noise modeling to correspond with the precise roadway alignment location, profile, and design
5 for I-11. This analysis will determine the noise mitigation requirements for I-11.

6 **N-2 Key Words: Noise Impacts, Saguaro National Park, Trucks**

7 **Frequent comment:** *Commenters expressed concern about noise impacts, specifically truck*
8 *noise, resulting from the project in Saguaro National Park.*

9 **Response N-2:** The FHWA highway traffic noise regulation, 23 CFR 772, constitutes the official
10 federal highway noise standards, which include Noise Abatement Criteria for different types of
11 land uses and human activities, and require the consideration of noise abatement mitigation
12 when traffic noise impacts that exceed a defined threshold are identified. In addition, FHWA and
13 ADOT are required to follow the current ADOT Noise Abatement Requirements (Noise Policy),
14 which provides the following during Tier 2 when the planning and design of a highway project
15 take place:

- 16 • Identification of traffic noise impacts and examination of potential mitigation measures
- 17 • Incorporation of reasonable (resident/owner preferences, noise reduction goals, cost
18 effectiveness) and feasible (engineering and acoustic) noise mitigation measures into the
19 highway project
- 20 • Coordination with local officials to provide helpful information on compatible land use
21 planning and control

22 The noise analysis completed for the Tier 1 EIS identified all noise sensitive receivers and land
23 uses. Noise measurements were taken to adequately represent existing noise levels. The TNM
24 Noise Model was used to predict 2040 projected noise levels throughout the corridor and
25 included noise levels adjacent to residential, parks, and recreational areas. ADOT conducted
26 noise measurements within SNP for the Tier 1 analysis at the locations identified by NPS and in
27 presence of its staff. The summary of predicted 2040 traffic noise levels at SNP are shown in
28 Table 3.8-3 of the Final Tier 1 EIS. See Section 3.8 of the Draft Tier 1 EIS for more information.

29 The Tier 2-level noise analysis will require updated noise measurements and more detailed
30 noise modeling to correspond with the precise roadway alignment location, profile, and design
31 for I-11. This analysis will determine the noise mitigation requirements for I-11.



1 **SECTION 3.9, VISUAL AND AESTHETICS**

2 **V-1 Key Words: Kitt Peak, Saguaro National Park, Views, Visual**
3 **Impacts**

4 **Frequent comment:** *Commenters expressed concern about visual and viewshed impacts*
5 *resulting from the project in Saguaro National Park and/or Kitt Peak. Concerns included*
6 *visibility, light pollution, and dark skies*

7 **Response V-1:** Saguaro National Park (SNP) is located within a defined Area of Visual Effect
8 (AVE), the area from which the Build Corridor Alternatives may or may not be visible. The
9 magnitude of visual impact varies depending on the location within the park and the time of the
10 visit. Visitors to SNP (West) and Tucson Mountain Park have varying expectations as to
11 solitude, natural quiet, and landscape views. The visual intrusions related to the Build Corridor
12 Alternatives could impact the visual resources and result in unsatisfactory visitor experiences.
13 See Section 3.9.3.5 of the Draft Tier 1 EIS and Section 3.9 of the Final Tier 1 EIS for more
14 information.

15 FHWA and ADOT recognize the importance of Saguaro National Park, a Class I airshed subject
16 to visibility and other air quality related value protections under federal law.

17 All Build Corridor Alternatives would have potential light pollution effects and incrementally
18 increase skyglow by introducing new sources of light. However, mitigation strategies would be
19 developed to minimize light pollution in sensitive areas. The impact of light pollution, or sky
20 glow, is further discussed in Section 3.9 of the Final Tier 1 EIS.

21 Sky glow is highly variable, and the quantitative evaluation of this potential impact will occur in
22 Tier 2 when the alignment locations and location-specific mitigation are identified. The Kitt Peak
23 Observatory is located approximately 15 miles outside of the area of visual effect and therefore
24 not likely to experience impacts from the proposed project.

25 **SECTION 3.10, AIR QUALITY**

26 **AQ-1 Key Words: Air Pollution**

27 **Frequent comment:** *Commenters expressed concern that the project will increase air pollution.*
28 *Comments were also received expressing that 55+ residents along the Recommended*
29 *Alternative fear the impacts the increased pollution will have on their health.*

30 **Response AQ-1:** The Tier 1 EIS evaluated air quality, specifically air toxics, which have the
31 potential to adversely affect human health. See Section 3.10 of the Final Tier 1 EIS for more
32 information. National Ambient Air Quality Standards (NAAQS) for Criteria Pollutants set limits to
33 protect public health, including the health of “sensitive” populations, such as asthmatics,
34 children, and the elderly. A qualitative air quality assessment was conducted as part of the Draft
35 Tier 1 EIS to identify potential changes in vehicle emissions, and the resulting potential changes
36 in air quality, as a result of implementing the Build Corridor Alternatives. The analysis is
37 qualitative and does not include a detailed quantitative evaluation of air quality emissions, which
38 is consistent with a Tier 1 study.



1 During Tier 2 NEPA analysis, a quantitative air quality analysis would be conducted once future
2 alternative alignments have been selected and advanced for further environmental evaluation.
3 Individual projects on the I-11 Corridor that are in nonattainment areas or maintenance areas
4 would need to conform to the NAAQS, requiring an assessment of vehicle emissions within the
5 region. Modeling of CO and particulate emissions at the project level would be conducted during
6 Tier 2 analysis to determine potential localized air quality effects (hotspots) from future
7 construction and operation of the I-11 Corridor.

8 **AQ-2 Key Words: Climate Change, Greenhouse Gas**

9 **Frequent comment:** *Commenters expressed concern that the project will increase greenhouse*
10 *gases and exacerbate climate change.*

11 **Response AQ-2:** Greenhouse gas emissions (GHGs) are different from other air pollutants
12 evaluated in federal environmental reviews because their impacts are not localized or regional
13 due to their rapid dispersion into the global atmosphere, which is characteristic of these gases.
14 The affected environment for CO₂ and other GHG emissions is the entire planet. Presently there
15 is no scientific methodology for attributing specific climatological changes to a particular source.

16 Having said that, tailpipe emissions that contribute to GHGs are projected to decrease in
17 general due to cleaner burning fuels and technological improvements to vehicles.

18 **AQ-3 Key Words: Air Quality, CAA NAAQS**

19 **Frequent comment:** *Commenters expressed that they would like to see the project comply with*
20 *the CAA NAAQS.*

21 **Response AQ-3:** Transportation projects, such as I-11, using federal funding and located in a
22 nonattainment or maintenance area must be included in a conforming Regional Transportation
23 Plan. The Regional Transportation Plan will demonstrate regional conformity, meaning the
24 projects planned will not interfere with attainment of the NAAQS in that area. During Tier 2, each
25 individual I-11 project in the nonattainment or maintenance areas will require completion of a
26 quantitative project-level conformity analysis to demonstrate that the project will not interfere
27 with the attainment of NAAQS in that area.

28 **SECTION 3.12, GEOLOGY, SOILS, AND PRIME AND UNIQUE** 29 **FARMLANDS**

30 **G-1 Key Words: Agricultural Land, Farmland**

31 **Frequent comment:** *Commenters expressed concern that the project could impact agricultural*
32 *lands, generational family farms, and the farming lifestyle.*

33 **Response G-1:** The project will likely impact agricultural lands. The Tier 1 EIS data do not
34 include a level of detail to distinguish which of the agricultural lands are family farms, but during
35 future Tier 2 analysis, the exact acreage of agricultural lands impacted, including detailed data
36 on which are family farms, will be refined based on the Selected Alternative.

37 The Farmland Protection Policy Act (7 U.S.C. 4202(b)) directs federal agencies to minimize the
38 extent to which their federal programs contribute to the unnecessary and irreversible conversion



1 of farmland to nonagricultural uses. The project will comply with the Farmland Protection Policy
2 Act.

3 **G-2 Key Words: Irrigation, Local Canals, Local Wells**

4 **Frequent comment:** *Commenters expressed concern that the project will impact irrigation as*
5 *related to farmland through the bisection of canals, impacts to wells, and diversion of water.*

6 **Response G-2:** The Draft Tier 1 EIS took a qualitative approach towards identifying and
7 evaluating impacts of 2,000-foot-wide corridors. During Tier 2, a site-specific analysis would be
8 undertaken to identify the specific roadway alignment (approximately 400 feet wide or less)
9 within the 2,000-foot-wide corridor. This will include identification of crucial infrastructure, such
10 as irrigation water supplies, and implementation of avoidance, replacement, compensation, or
11 other measures, as appropriate.

12 **SECTION 3.13, WATER RESOURCES**

13 **WR-1 Key Words: Water Infrastructure**

14 **Frequent comment:** *Commenters expressed concern that the project will impact water*
15 *infrastructure both overall and in specific locations.*

16 **Response WR-1:** The Tier 1-level analysis evaluated impacts to water resources within the
17 study area to define the corridor alternatives and identify the recommended and preferred
18 corridor alternatives. See Final Tier 1 EIS Section 3.13. Location-specific impacts to water
19 infrastructure is acknowledged in the Tier 1 EIS, and future Tier 2-level analyses would include
20 updating the identification of water infrastructure and avoidance, minimization, and mitigation
21 measures, as appropriate.

22 **WR-2 Key Words: Hazardous Materials Spills, Water Resources**

23 **Frequent comment:** *Commenters questioned what plans are in place to prevent the*
24 *contamination of water supplies, particularly the Tucson water supply in Avra Valley, due to*
25 *spills on the roadway.*

26 **Response WR-2:** In accordance with U.S. Department of Transportation regulations for the
27 specific type of cargo, Arizona highways are open to all kinds of traffic. I-11, if implemented, is
28 expected to operate under the same rules as other similar facilities in the state; transport of
29 hazardous cargo would likely be permissible. The movement of hazardous materials presents
30 exposure risks to groundwater and other water resources from accidental releases and spills.
31 Construction of the Build Corridor Alternatives would introduce risks to areas where new high
32 capacity roadways would be constructed. FHWA and ADOT recognize that spills on the
33 Interstates in Arizona can happen and would implement procedures to minimize the harmful
34 effects should such an event occur. For example, ADOT would dispatch emergency responders
35 to the hazardous spill location, including Arizona Department of Public Safety and the local
36 municipality's fire and police departments on incidents within their jurisdiction. As needed, those
37 responders will coordinate with other federal, state, and local emergency responders as event
38 circumstances require, and conduct cleanup actions to address those releases to protect human
39 health and the environment, including water supplies. To minimize the risk and impact of
40 potential spills, best management practices would be identified during the Tier 2 analysis. A



1 discussion of hazardous materials spills as they relate to water resources and potential
2 avoidance, minimization, and mitigation measures that will be further evaluated at the Tier 2
3 level is in Section 3.13 of the Final Tier 1 EIS.

4 **WR-3 Key Words: Pollution, Runoff, Water Resources**

5 **Frequent comment:** *Commenters expressed concern that the project will produce roadway*
6 *runoff that will pollute water resources, both water supplies and aquifers.*

7 **Response WR-4:** Numerous federal and state regulatory requirements, best management
8 practices and mitigation measures are available to reduce impacts of pollution and runoff from
9 the roadway. General strategies that would minimize pollution and runoff are discussed in
10 Section 3.13.5 of the Draft Tier 1 EIS. Language has been added to the Final Tier 1 EIS Section
11 3.13.5 to provide additional examples of best management practices and mitigation measures
12 that could be further evaluated at the Tier 2 level to limit runoff. Specific measures would be
13 evaluated as part of a Tier 2 analysis.

14 **WR-4 Key Words: Floodplain Impacts, Purple Alternative**

15 **Frequent comment:** *Commenters expressed concern that there would be an increased*
16 *potential for flooding associated with the Purple Alternative.*

17 **Response WR-5:** The Tier I-level floodplains analysis takes a broad approach to identify
18 floodplains within the corridor options. Future Tier 2 analyses would include location-specific
19 identification of potential flooding hazards and would identify avoidance, minimization, and
20 mitigation measures, as appropriate. General strategies that would minimize impacts to
21 floodplains are discussed in Section 3.13.5 of the Draft Tier 1 EIS. Section 3.13.5 of the Final
22 Tier 1 EIS provides examples of mitigation measures that could be further evaluated at the Tier
23 2 level to minimize impacts to floodplains.

24 **SECTION 3.14, BIOLOGICAL RESOURCES**

25 **BR-1 Key Words: Mitigation, Wildlife Habitat**

26 **Frequent comment:** *Commenters expressed concern that the project will impact wildlife habitat*
27 *and question how those impacts will be mitigated.*

28 **Response BR-1:** Potential impacts to biotic communities, which include protected native plants
29 and the wildlife and wildlife habitat associated with each biotic community, are analyzed in the
30 Tier 1 EIS. See Section 3.14 of the Final Tier 1 EIS for the detailed discussion. The Preferred
31 Alternative was chosen to minimize impacts to biological resources as much as possible while
32 meeting the purpose of and need for the project.

33 Impacts to biotic communities were evaluated at the 2,000-foot-corridor level; however, at Tier 2
34 only a 400-foot or less alignment would be chosen based on studies that include a quantitative
35 impacts analysis and incorporation of appropriate mitigation measures. The Final Tier 1 EIS
36 contains general mitigation strategies to protect biological resources from direct impacts,
37 including the commitment to maintain wildlife connectivity and funding wildlife movement studies
38 up to four years prior to Tier 2-level studies to identify the appropriate number of wildlife
39 crossings and the best locations for those crossings within known wildlife linkage corridors.



1 Potential indirect impacts to biotic communities including development, invasive species, and
2 others are also evaluated in the Final Tier 1 EIS. See Section 3.14.6 of the Final Tier 1 EIS for
3 the biological resource mitigation for potential impacts.

4 **BR-2 Key Words: Genetic Isolation, Habitat Fragmentation, Wildlife**
5 **Connectivity**

6 **Frequent comment:** *Commenters expressed concern that the project will negatively impact*
7 *wildlife connectivity, result in habitat fragmentation, disrupt wildlife corridors, and result in*
8 *genetic isolation and disrupt gene flow.*

9 **Response BR-2:** FHWA and ADOT recognize that the ability for wildlife to disperse or move
10 between habitats and across landscapes is a fundamental part of their life history and survival.
11 Connectivity in the landscape is maintained by comparable habitat patches being close together
12 or linked by corridors of suitable habitat that wildlife can use or move through. All wildlife
13 species require connectivity to complete essential aspects of their life history, including
14 dispersal, colonization, and access to resources. In the long term, connectivity affects the size
15 and genetic viability of subpopulations, which play an important role in the survival and
16 persistence of populations. Human development fragments and isolates naturally connected
17 habitats across the landscape. In addition, the effects of urban expansion on species dispersal
18 may vary substantially across taxa. Research demonstrates that these negative impacts can be
19 minimized or mitigated by focusing on protecting and enhancing connections, corridors, or
20 linkages between habitat areas. See the Final Tier 1 EIS Section 3.14 for a more extensive
21 analysis of I-11 wildlife connectivity issues.

22 The synthesis of information in the efforts and reports completed on wildlife connectivity in
23 Arizona does not necessarily represent an exhaustive mapping of all-important wildlife linkages
24 and barriers in the Study Area. Rather, this information should be considered an initial
25 assessment of wildlife movement patterns. This initial assessment will need to be supplemented
26 in the future by further analysis and refinement, including additional expert input, research
27 studies of wildlife movement patterns, and additional linkage delineation based on site-specific
28 data. ADOT committed to specific mitigation strategies to maintain wildlife connectivity in the
29 Final Tier 1 EIS. In addition, ADOT committed to funding wildlife movement studies up to four
30 years prior to Tier 2-level studies to identify the appropriate number of wildlife crossings and the
31 best locations for those crossings within known wildlife linkage corridors. See Section 3.14.6 of
32 the Final Tier 1 EIS for the biological resource mitigation commitments.

33 **BR-3 Key Words: Bird Watching, Migratory Birds, Santa Cruz Flats**

34 **Frequent comment:** *Commenters expressed concern that the project will impact migrating*
35 *birds and bird watching, especially in the Santa Cruz Flats area.*

36 **Response BR-3:** Potential impacts to avian species protected under the Migratory Bird Treaty
37 Act (MBTA) are discussed in the Final Tier 1 EIS Sections 3.14.4 and 3.14.5 with
38 recommendations on freeway design, such as minimizing tree plantings in medians and
39 minimizing lighting, which could attract birds to busy roadway edges. The full list of biological
40 resource mitigation strategies committed to is in Section 3.14.6 of the Final Tier 1 EIS.

41 Potential impacts to designated Important Bird Areas (IBAs) were also compared for each Build
42 Corridor Alternative in the Final Tier 1 EIS. The Preferred Alternative would have less potential
43 to impact IBAs than the Recommended Alternative. The Preferred Alternative does still bisect

1 the Santa Cruz Flats area, as it is constrained from being placed farther west by the Tohono
2 O’odham Nation. The Santa Cruz Flats area is a popular birding location, especially in the
3 winter, due to the presence of wintering birds using the agricultural fields. However, the 2,000-
4 foot-wide corridor is over one-half mile west of the turf farms, which based on current use are an
5 important and rare wintering location for mountain plovers in Arizona.

6 See response GlobalTopic_6 for further information about avoidance measures applied for the
7 Santa Cruz River area.

8 **BR-4 Key Words: Mitigation, Sensitive Species, Threatened and**
9 **Endangered Species**

10 **Frequent comment:** *Commenters expressed concern that the project will impact threatened*
11 *and endangered or other sensitive species and question how impacts will be mitigated.*

12 **Response BR-4:** Final Tier 1 EIS Section 3.14 provides an overview of potential special status
13 species and critical habitat that occur in the I-11 Study Area and how the Build Corridor
14 Alternatives may impact those species by habitat type. The Preferred Alternative was chosen to
15 minimize impacts to biological resources as much as possible while meeting the purpose of and
16 need for the project.

17 In addition, ADOT is committed to the following mitigation strategies for species protected under
18 the Endangered Species Act (ESA). ADOT will avoid or minimize impacts to designated or
19 proposed critical habitat. If impacts to critical habitat cannot be avoided, consultation with
20 USFWS will occur during the Tier 2 analysis. Prior to the Tier 2 process, ADOT will conduct a
21 thorough habitat assessment in all areas that have potential habitat for ESA-listed species. If
22 suitable habitat occurs within the construction footprint, ADOT will avoid or minimize impacts.
23 Additionally, pre-construction surveys will be completed for all ESA-listed species, or it will be
24 assumed that the species occurs on-site. For the southwestern willow flycatcher, western
25 yellow-billed cuckoo, and Yuma Ridgway’s rail, surveys during two breeding seasons will be
26 conducted prior to the Tier 2 process, as well as surveys for the Pima pineapple cactus, one
27 year prior to initiation of the Tier 2 process. During the Tier 2 process, ADOT will consult with
28 USFWS. Potential mitigation measures to avoid or minimize impacts to ESA-listed species will
29 be determined through consultation with USFWS during the Tier 2 process, but could include
30 breeding season restrictions, translocation of individuals, minimization of vegetation removal,
31 minimization of the project footprint, etc. During the Tier 2 process, if impacts to ESA-listed
32 species or habitat are determined likely to occur, mitigation will be negotiated with USFWS.

33 Biological resource mitigation strategies for ESA or other sensitive species are included in Final
34 Tier 1 EIS Section 3.14.6.

35 **BR-5 Key Words: Adjacent Parks, Wildlife**

36 **Frequent comment:** *Commenters expressed concern that the project will impact wildlife within*
37 *park and recreational properties adjacent to the project.*

38 **Response BR-5:** One environmental consideration used to develop the Build Corridor
39 Alternatives was the avoidance of previously designated protected areas that may preclude the
40 implementation of I-11 or have other fatal flaws. Examples of these types of areas include
41 national parks or monuments, sovereign tribal lands, designated wilderness, or critical habitat
42 and designated roadless areas. However, construction of a new freeway can indirectly impact



1 parks and recreation opportunities by impacting wildlife connectivity to those properties, as well
2 as noise and visual impacts. The Final Tier 1 EIS contains discussions on the potential impacts
3 of I-11 to wildlife connectivity in Section 3.14, and indirect noise and visual impacts in Section
4 3.17. Mitigation strategies for all resources are summarized in Chapter 7 of the Final Tier 1 EIS.

5 **BR-6 Key Words: TMC, Wildlife Corridors**

6 **Frequent comment:** *Commenters expressed concern that the project will impact wildlife*
7 *corridors, in particular, the TMC. The project is contrary to management guidelines prohibiting*
8 *development.*

9 **Response BR-6:** The following mitigation strategies are included in the Final Tier 1 EIS and are
10 specific to potential impacts to the TMC: (1) relocating and reclaiming Sandario Road;
11 (2) conducting wildlife studies prior to the Tier 2 process; (3) aligning I-11 wildlife crossing
12 structures to match the existing CAP canal siphons (seven crossings total), although they would
13 be significantly longer; (4) creating additional wildlife crossing(s) near the TMC, depending on
14 the results of wildlife studies; (5) acquiring property (at a minimum 1:1 ratio) to support
15 additional wildlife connectivity corridors within Avra Valley for the number of acres of the TMC
16 that would be impacted by I-11; and (6) implementing design restrictions, such as no
17 interchanges in the TMC or immediate area, and minimizing the width of I-11 to limit the I-11
18 footprint in the TMC area. See Sections 4.6.3, 4.9, and 4.12 in the Final Tier 1 EIS for more
19 detail on these Section 4(f) mitigation strategies and Chapter 7 for the complete list of Tier 1
20 mitigation including those for Section 4(f).

21 **BR-7 Key Words: Altar Valley, Avra Valley, Biologic Resources**

22 **Frequent comment:** *Commenters expressed concern that the project will impact biologic*
23 *resources in Altar and Avra Valleys and question how impacts will be mitigated. Commenters*
24 *inquired about natural resources, open space, and wildlife crossings, and suggested the use of*
25 *I-10 in order to stay out of the desert habitat.*

26 **Response BR-7:** Section 3.14 of the Final Tier 1 EIS discusses the biological resources that
27 occur in the Altar and Avra Valleys and potential impacts to those resources. In addition, the
28 section provides mitigation strategies for the Altar and Avra Valleys as well as the rest of the I-
29 11 corridor that ADOT committed to. For example, ADOT committed to complete future analysis
30 prior to, and during, the Tier 2 process related to biological resources including extensive wildlife
31 studies to inform corridor design especially related to wildlife connectivity, which is an important
32 concern in Avra Valley.

33 **BR-8 Key Words: Floodplains, Gila River, Sensitive Species**

34 **Frequent comment:** *Commenters expressed concern that the project will impact sensitive*
35 *species associated with the Gila River and its floodplain.*

36 **Response BR-8:** The Preferred Alternative eliminates the need for a new crossing of the Gila
37 River, thereby diminishing the potential impact to the Gila River and the sensitive species that
38 occur within the floodplain. See Sections 3.13 and 3.14 of the Final Tier 1 EIS for more detail on
39 impacts to the river and floodplain species.



1 See response GlobalTopic_2 for further information.

2 **BR-9 Key Words: Pima County Conservation Lands**

3 **Frequent comment:** *Commenters expressed concern that the project will impact Pima County*
4 *Conservation Lands.*

5 **Response BR-9:** The Pima County Conservation Lands System are lands that Pima County
6 has either purchased outright, placed easements, or zoned for conservation, floodplain
7 protection, or open space. Pima County is adding lands to this program on an ongoing basis.
8 Section 3.3 and Appendix E14 of the Final Tier 1 EIS include a description of this program.
9 Response G-1 details that both a west option and an east option in Pima County will be carried
10 forward in order to further evaluate resources. Carrying both options forward will allow ADOT to
11 conduct the requested analyses on Conservation Lands System impacts and mitigation in Tier
12 2.

13 **BR-10 Key Words: Mitigation, Wildlife Linkages, Wildlife Studies**

14 **Frequent comment:** *Commenters expressed concern that the project will negatively impact*
15 *wildlife linkages. Commenters requested further studies on wildlife and mitigation discussions.*

16 **Response BR-10:** Comments were received suggesting that ADOT coordinate with additional
17 agencies/stakeholders prior to and during the Tier 2 NEPA process to determine future wildlife
18 connectivity data needs and study design. Since AGFD is the Arizona expert on wildlife
19 connectivity, ADOT has committed to coordinate with AGFD regarding future wildlife studies
20 (see Final Tier 1 EIS Section 3.14). ADOT will identify additional agencies/stakeholders for
21 coordination as segments of the I-11 are funded for construction and relevant land managers
22 can be determined for each particular I-11 segment.

23 **SECTION 3.15, TEMPORARY CONSTRUCTION-RELATED** 24 **IMPACTS**

25 **TC-1 Key Words: Construction Impacts**

26 **Frequent comment:** *Commenters expressed concern about the impact of construction on the*
27 *environment and surrounding communities.*

28 **Response TC-1:** Construction impacts can be either temporary or permanent. They can include
29 transportation, land use, recreation, economic, cultural, noise, visual and aesthetics, air quality,
30 hazardous materials, geology and soils, water, and biologic resources impacts. All the Build
31 Corridor Alternatives would result in construction impacts. See Section 3.15 of the Draft Tier 1
32 EIS for more information on construction-related impacts and Chapter 3 for detail on the
33 additional types of impacts listed above.

34 Future Tier 2 analysis will provide additional detail on the construction methodology for the
35 selected alternative. The exact design and configuration of I-11 would be highly dependent upon
36 local conditions, and efforts will be undertaken to gather information about local features to
37 minimize impacts as part of the Tier 2 analysis. Further, the future Tier 2 analysis will address
38 traffic management and detours that may occur during the construction period; as well as the
39 minimization and mitigation of environmental impacts like adherence to dust control regulations



1 and obtaining a stormwater pollution prevention permit ahead of construction. Details about
2 construction techniques, equipment, and staging areas will also be documented as part of the
3 future Tier 2 analysis.

4 SECTION 3.17, INDIRECT AND CUMULATIVE EFFECTS

5 IC-1 Key Words: Congestion, Cumulative Impacts

6 **Frequent comment:** *Commenters expressed interest regarding congestion as a cumulative*
7 *impact.*

8 **Response IC-1:** Congestion was identified and analyzed in Section 3.17 of the Draft Tier 1 EIS.
9 Traffic conditions within the Study Area would improve under the Build Alternatives; therefore,
10 no adverse direct or indirect traffic effects to mobility or congestion are anticipated for the
11 Preferred Alternative.

12 CHAPTER 4, PRELIMINARY FINAL SECTION 4(F) 13 EVALUATION

14 4F-1 Key Words: Section 4(f) Determination

15 **Frequent comment:** *Commenters questioned how Section 4(f) determinations are made.*

16 **Response 4F-1:** Section 4(f) property is defined in 23 CFR 774.17: “A Section 4(f) property
17 means publicly owned land of a public park, recreation area, or wildlife or waterfowl refuge of
18 national, state, or local significance, or land of an historic site of national, state, or local
19 significance.” A historic site is “any prehistoric or historic district, site, building, structure, or
20 object included in, or eligible for inclusion in, the National Register” (of Historic Places).

21 Key criteria in the definition of public parks, recreation areas, and wildlife and waterfowl refuges
22 are the following:

- 23 1. The property is publicly owned;
- 24 2. The property is open to the public;
- 25 3. The primary function of the property is as a public park, recreation area or wildlife and
26 waterfowl refuge; and
- 27 4. The property is significant.

28 Source data to support key criteria 3 and 4 include the formal designation of the property, such
29 as a Presidential Proclamation in the case of national monuments, adopted master plans, and
30 adopted management plans. FHWA determines significance by comparing the availability and
31 function of the property with the objectives of the officials with jurisdiction over the property. If
32 the property plays an important role in meeting those objectives, FHWA considers the property
33 to be significant and consults with the official with jurisdiction for the property on that
34 determination.



1 FHWA applied these definitions and key criteria to properties in the Study Area; the properties
2 assessed in the Final Preliminary Section 4(f) Evaluation provided in Chapter 4 of the Final Tier
3 1 EIS are those properties that achieve the definition and the criteria. Properties that do not
4 achieve the definition and the criteria are not protected by Section 4(f) and were not evaluated.
5 For identified properties that meet the definition and the criteria and, therefore, are protected by
6 Section 4(f) see Tables 4-1, 4-2, 4-4, and 4-5 in the Final Tier 1 EIS.

7 **4F-2 Key Words: Net Benefit**

8 **Frequent comment:** *Commenters inquired about the use and applicability of the Programmatic*
9 *Net Benefit approach.*

10 **Response 4F-2:** In the Draft Preliminary Section 4(f) Evaluation, FHWA proposed applying the
11 Nationwide Programmatic Net Benefit Section 4(f) Evaluation for the TMC property. At the time,
12 FHWA understood that the proposal would be subject to further consultation with the officials
13 with jurisdiction regarding potential use of the property. In reviewing and considering comments
14 from the Official with Jurisdiction, the Bureau of Reclamation, FHWA determined the Net Benefit
15 Programmatic will no longer be pursued. See Chapter 4 of the Final Tier 1 EIS for more
16 information.

17 **4F-3 Key Words: Constructive Use**

18 **Frequent comment:** *Commenters expressed concern surrounding the timing of a constructive*
19 *use analysis for the project.*

20 **Response 4F-3:** The Draft and Final Preliminary Tier 1 Section 4(f) Evaluation include an
21 analysis of the potential for constructive use of Section 4(f) properties. See Chapter 4 of the
22 Draft and Final Tier 1 EIS. During Tier 2 studies, ADOT will complete a Final Section 4(f)
23 Evaluation that includes constructive use analyses of Section 4(f) properties as necessary.

24 **4F-4 Key Words: Corridor Options, Section 4(f)**

25 **Frequent comment:** *Commenters questioned how the analysis at the option level will be*
26 *applied to Section 4(f).*

27 **Response 4F-4:** The Section 4(f) regulation and FHWA's 2012 Section 4(f) Policy Paper enable
28 comparison of the Build Alternatives at the corridor level, particularly the avoidance and least
29 overall harm analyses. For this reason, the Draft and Final Preliminary Section 4(f) Evaluations
30 have a corridor-wide analysis focus.

31 **CHAPTER 5, COORDINATION AND OUTREACH**

32 **CO-1 Key Words: Project Information, Project Mailings**

33 **Frequent comment:** *Commenters questioned why the project mailings didn't include more*
34 *information about the project.*

35 **Response CO-1:** The Draft Tier 1 EIS outreach process followed FHWA regulations and
36 guidance for public involvement. The purpose of the mailed notifications is to provide the public
37 with information on the project recommended corridor, locations and times of the six public

1 hearings, and how to provide public comments through a variety of methods. More detailed
2 information, if desired, was provided in the Draft Tier 1 EIS and on the project website.

3 Regulations provide information on the requirements for notifications to the public. Specifically,
4 23 CFR 771.111(h)(2)(iv) states, “State public hearing procedures must provide for: Reasonable
5 notice to the public of either a public hearing or the opportunity for a public hearing. Such notice
6 will indicate the availability of explanatory information. The notice must also provide information
7 required to comply with public involvement requirements of other laws, executive orders, and
8 regulations.” 40 CFR 1506.6(b) states “Agencies shall: Provide public notice of NEPA-related
9 hearings, public hearings, and the availability of environmental documents so as to inform those
10 persons and agencies who may be interested or affected.”

11 **CO-2 Key Words: Project Mailing List**

12 **Frequent comment:** *Commenters questioned why they did not receive project mailings and*
13 *inquired about the distribution process.*

14 **Response CO-2:** Mail notifications were sent via USPS Every Door Direct Mail to 95,054
15 addresses within 1 mile on either side of the centerline of all alternatives identified in the
16 Alternatives Selection Report. As part of the NEPA process, 40 CFR 1506.6(b) states,
17 “Agencies shall: Provide public notice of NEPA-related hearings, public hearings, and the
18 availability of environmental documents so as to inform those persons and agencies who may
19 be interested or affected.” 40 CFR 1506.6(b)(3)(viii) states, “In the case of an action with effects
20 primarily of local concern the notice may include: direct mailing to owners and occupants of
21 nearby or affected property.” This is in addition to the other notice actions taken including
22 publication in local newspapers, through local media, and notice to Indian tribes [40 CFR
23 1506.6(b)(3)(ii), iv) and (v)].

24 The I-11 project team attempted to reach as many stakeholders as possible. Public hearing
25 notification included newspaper and radio advertisements, news releases, GovDelivery notices,
26 as well as videos, posters, postcards, and direct mailers. Earned media, social media, and the
27 study website also contained project information and notifications. Detailed descriptions of all
28 advertisements are included in Appendix G of the Final Tier 1 EIS. The project team has
29 continuously worked to notify as many residents as possible through a variety of means. For
30 more information on the public hearing outreach process and notifications, see Final Tier 1 EIS
31 Chapter 5 and Appendix G.

32 **CO-3 Key Words: Public Feedback, NEPA**

33 **Frequent comment:** *Commenters requested more information regarding how the NEPA*
34 *process was used to enable public feedback on the Draft Tier 1 EIS and the presented*
35 *alternatives.*

36 **Response CO-3:** The NEPA process requires several stages of outreach to obtain public
37 feedback on the alternatives to be evaluated and the Draft Tier 1 EIS. The first public outreach
38 milestone is the scoping process, which occurred in June 2016. The scoping process provided
39 the public with the opportunity to discuss and comment on the scope, or range, of issues to be
40 addressed, identify any significant issues related to a proposed action, and give input on the
41 defined study area over the course of six scoping meetings. In May 2017, six public information
42 meetings were held, which provided a study update, sought input on the alternatives screening
43 process, and recommended a range of reasonable alternatives to advance into the Draft Tier 1



1 EIS. For each outreach milestone, notifications were provided by email, newspaper
2 advertisement, radio advertisement, and the project website.

3 Six public hearings were held in April and May 2019 to present information and obtain
4 comments on the Draft Tier 1 EIS, as well as gain any additional input from the public. Public
5 hearing notification included newspaper and radio advertisements, news releases, GovDelivery
6 notices, as well as videos, posters, postcards, and direct mailers. Earned media, social media,
7 and the study website also contained project information and notifications. Detailed descriptions
8 of all advertisements are included in Appendix G of the Final Tier 1 EIS. For more information
9 on the project outreach and coordination, see Chapter 5 in the Final Tier 1 EIS.

10 **CO-4 Key Words: Public Outreach, Tier 1, Tier 2**

11 **Frequent comment:** *Commenters inquired about the difference between the Tier 1 and Tier 2*
12 *public outreach process.*

13 **Response CO-4:** There is no difference in the requirements for a Tier 1 versus a Tier 2 NEPA
14 study for public and agency outreach. These requirements can be found in 23 CFR 771.111 and
15 40 CFR 1506.6, in addition to the other numerous FHWA policies and guidance documents.
16 FHWA is following a tiered environmental process because a Tier 1 EIS is an effective method
17 for managing the NEPA process across a large geographic area, such as the I-11 Corridor. It
18 allows the NEPA process to move forward with no identified funding, laying the groundwork for
19 where the corridor would be located to aid in future planning. Tier 2 environmental studies and
20 the project-level design will address site-specific details, including project impacts, costs, and
21 mitigation measures more thoroughly than they could be addressed in the Tier 1 study.

22 **CO-5 Key Words: Public Hearing Locations**

23 **Frequent comment:** *Commenters expressed that public hearings were not held in all*
24 *communities and inquired about how locations were chosen.*

25 **Response CO-5:** The I-11 project team attempted to reach as many stakeholders as possible
26 during each round of public outreach. To do this, six public information meetings were held
27 throughout the Study Area for each round of study milestones, including the public hearings.
28 Meetings were held in Nogales, Tucson, Marana, Casa Grande, Buckeye, and Wickenburg. At
29 least one public meeting or hearing was held in each county located in the Study Area.

30 The six public hearings were held to present information and obtain comments on the Draft Tier
31 1 EIS, as well as gain any additional input from the public. Hearings were planned in multiple
32 locations to accommodate the lengthy study corridor, allowing residents and stakeholders in
33 different locations to attend at least one hearing. In January 2017 a Public Outreach and
34 Agency Coordination Plan was published to the project website that provided a high-level
35 summary of the plan that included holding six public hearings with at least one per county
36 (ADOT 2017o). Appendix G of the Draft Tier 1 EIS includes reports that outline previous
37 outreach efforts for scoping and alternatives development. Public hearing locations were
38 consistent with locations used for previous outreach efforts. For more information on the
39 determination of locations for public hearings, please see
40 <http://i11study.com/Arizona/Documents.asp> for the Agency and Public Information Meeting
41 Summary Report (Section 5.4) (ADOT 2017e). Anyone was welcome to attend any of the
42 meetings or hearings. A member of the public interested in attending a public meeting or public



- 1 hearing was not required to be a resident of a particular community in order to attend a meeting
- 2 or hearing in the six locations.

- 3 The public meetings and hearings were only one part of an extensive outreach process for this
- 4 project and all the public meeting and hearing information was available (and still is) on the
- 5 ADOT I-11 Study website at www.i11study.com/Arizona. Tier 2 environmental studies will
- 6 include additional public information meetings focused on geographically specific future I-11
- 7 improvements.