



1 EXECUTIVE SUMMARY

2 The Federal Highway Administration (FHWA) and the Arizona Department of Transportation
3 (ADOT) are conducting the environmental review process for the Interstate 11 (I-11) Corridor
4 from Nogales to Wickenburg, Arizona. This Final Tier 1 Environmental Impact Statement and
5 Preliminary Section 4(f) Evaluation (Final Tier 1 EIS) has been prepared as part of this process
6 in accordance with the National Environmental Policy Act (NEPA) and other regulatory
7 requirements. FHWA is the Federal Lead Agency and ADOT is the local project sponsor under
8 NEPA. As the federal lead agency, FHWA is responsible for compliance with NEPA and related
9 statutes.

10 ES.1 Project Background

11 The concept of a high-capacity, north-south interstate freeway facility connecting Canada and
12 Mexico through the western United States (US) has been considered for more than 20 years. It
13 was initially identified as the CANAMEX trade corridor in the 1991 Intermodal Surface
14 Transportation Efficiency Act, established under the North American Free Trade Agreement in
15 1993, and defined by the US Congress in the 1995 National Highway Systems Designation Act
16 (Public Law 104-59). CANAMEX was designated as High-Priority Corridor #26 in the National
17 Highway System, recognizing the importance of the corridor to the nation's economy, defense,
18 and mobility.

19 This NEPA process builds upon the prior I-11 and Intermountain West Corridor Study, a
20 multimodal planning effort completed in 2014 that involved ADOT, Nevada Department of
21 Transportation (NDOT), FHWA, Federal Railroad Administration, Maricopa Association of
22 Governments, Regional Transportation Commission of Southern Nevada, and other key
23 stakeholders. The I-11 and Intermountain West Corridor Study identified the I-11 Corridor as a
24 critical piece of multimodal infrastructure that would diversify, support, and connect the
25 economies of Arizona and Nevada.

26 In December 2015, the US Congress approved the Fixing America's Surface Transportation Act
27 (FAST Act), which is a 5-year legislation plan to improve the nation's surface transportation
28 infrastructure. The FAST Act formally designates I-11 as an interstate freeway throughout
29 Arizona, reinforcing ADOT's overall concept for I-11 that emerged from the I-11 and
30 Intermountain West Corridor Study (NDOT and ADOT 2014). This Final Tier 1 EIS is the next
31 step in the continuum of project development activities for the I-11 Corridor between Nogales
32 and Wickenburg.

33 ES.2 Scope of Final Tier 1 EIS

34 This Final Tier 1 EIS evaluates alternatives for the I-11 Corridor for approximately 280 miles
35 between Nogales and Wickenburg in Santa Cruz, Pima, Pinal, Maricopa, and Yavapai Counties,
36 Arizona. The Tier 1 EIS process is an effective method for managing the NEPA process across
37 a large geographic area such as the I-11 Corridor Study Area (Study Area).



1 The Draft Tier 1 EIS provided information for the public, agencies, and tribes to comment on the
2 analysis of a set of Build Corridor Alternatives and a No Build Alternative, and identified a
3 Recommended Alternative. FHWA is following a tiered environmental process.

4 This Final Tier 1 EIS is presented in a condensed format per FHWA Technical Advisory
5 T 6640.8A, *Guidance for Preparing and Processing Environmental and Section 4(f) Documents*
6 (1987). The condensed format avoids duplication of content presented in the Draft Tier 1 EIS
7 that remains unchanged or does not affect the NEPA decisions to be made.

8 As I-11 is intended to extend from Mexico to Canada, highway, rail, and utilities may be located
9 in the same corridor. The analysis in this Final Tier 1 EIS does not preclude rail or utility co-
10 location if this infrastructure is implemented in the future. The planning for any future rail or
11 utility infrastructure co-located with I-11 would need to include a separate environmental review
12 process.

13 **ES.3 Need for the Proposed Facility**

14 The assessment of needs associated with I-11 from Nogales to Wickenburg builds upon the I-11
15 and Intermountain West Corridor Study and its accompanying Planning and Environmental
16 Linkages document (NDOT and ADOT 2014). Key transportation-related problems and issues in
17 the Study Area were identified based on a combination of previous studies and input from
18 agency coordination and public involvement during the I-11 Corridor Study scoping process.
19 The problems, issues, and opportunities identified in the Study Area include:

- 20 • **Population and employment growth:** High-growth areas need access to the high-capacity,
21 access-controlled transportation network.
- 22 • **Traffic growth and travel time reliability:** Increased traffic growth reduces travel time
23 reliability due to unpredictable freeway conditions that impede travel flows and hinder the
24 ability to move people and goods around and between metropolitan areas efficiently.
- 25 • **System linkages and regional mobility:** The lack of a north-south interstate freeway link in
26 the Intermountain West constrains trade, reduces access for economic development, and
27 inhibits efficient mobility.
- 28 • **Access to economic activity centers:** Efficient freeway access and connectivity to major
29 economic activity centers are required for operations in a competitive economic market.
- 30 • **Homeland security and national defense:** Alternate interstate freeway routes and regional
31 route redundancy help alleviate congestion and prevent bottlenecks during emergency
32 situations. These routes may be parallel or may generally serve the same major origin and
33 destination points, with local or regional roads connecting the freeways.

34 **ES.4 Purpose of the Proposed Facility**

35 Given the need for greater connectivity and travel time reliability as population and employment
36 continue to increase in the Study Area, the purpose of the I-11 corridor is to:



- 1 • Provide a high-priority, high-capacity, access-controlled transportation corridor to serve
2 population and employment growth.
- 3 • Support improved regional mobility for people and goods to reduce congestion and improve
4 travel efficiency.
- 5 • Connect metropolitan areas and markets in the Intermountain West to Mexico and Canada
6 through a continuous high-capacity transportation corridor.
- 7 • Enhance access to the high-capacity transportation network to support economic vitality.
- 8 • Provide for regional route redundancy to facilitate efficient mobility for emergency
9 evacuation and defense access.

10 **ES.5 Alternatives Considered**

11 The Tier 1 EIS alternatives development process narrowed down a large initial range of
12 suggested options to a smaller reasonable range to carry forward for detailed evaluation in the
13 Draft Tier 1 EIS. The Project Team, comprised of FHWA, ADOT, and their consultant team, first
14 developed a range of corridor options (or segments) within the Study Area and lettered them
15 from A to W. The corridor options were based on prior plans and studies, agency scoping input,
16 public input, tribal coordination, and technical analysis. The Project Team eliminated options
17 that did not perform as well as others in the same area and then combined remaining options to
18 form three end-to-end Build Corridor Alternatives (Purple, Green, and Orange).

19 **ES.5.1 Purple, Green, Orange, and Recommended End-to-End Alternatives**

20 The Draft Tier 1 EIS compared the Purple, Green, and Orange Alternatives and the No Build
21 Alternative. The end-to-end Build Corridor Alternatives (Purple, Green, and Orange) represent
22 the range of viewpoints gathered from stakeholders, agencies, tribes, and the public during the
23 NEPA scoping process. The Orange Alternative consists mostly of existing interstate and
24 highway corridors. The Green Alternative is primarily new corridors not co-located with existing
25 highways, and the Purple Alternative is a mix of existing and new corridors. The Draft Tier 1 EIS
26 recommended a hybrid alternative that used pieces of each end-to-end Build Corridor
27 Alternative, referred to as the Recommended Alternative.

28 Each of the Build Corridor Alternatives is a 2,000-foot-wide corridor within which a future Tier 2
29 study would place the specific alignment of I-11 and design, assumed to be approximately
30 400 feet wide. If a Build Corridor Alternative is selected in the Tier 1 EIS Record of Decision, it
31 will be studied further in future Tier 2 NEPA analyses and constructed in phases. The 2,000-
32 foot-wide corridor studied in the Tier 1 EIS provides flexibility for future studies to also consider
33 co-location of rail or utilities.

34 **ES.5.2 No Build Alternative**

35 The No Build Alternative is the baseline for comparison to the Build Corridor Alternatives and is
36 evaluated as a full alternative in the Draft Tier 1 EIS. The No Build Alternative consists of the
37 existing transportation system as well as committed transportation projects that are



1 programmed for funding in ADOT's 2018-2022 Five-Year Transportation Facilities Construction
2 Program (ADOT 2017a).

3 **ES.5.3 Preferred Alternative**

4 FHWA and ADOT have identified a Preferred Alternative in this Final Tier 1 EIS that is different
5 from the Recommended Alternative in the Draft Tier 1 EIS. The Preferred Alternative is shown
6 on **Figure ES-1**. The Recommended Alternative is shown on **Figure ES-2**. **Chapter 6** describes
7 the Preferred Alternative and the rationale for its selection.

8 **ES.6 Comparison of Recommended and Preferred Alternatives**

9 The Final Tier 1 EIS documents the NEPA study completed to date, culminating in the
10 identification of the Preferred Alternative. This process included technical analysis, coordination
11 with study partners such as Cooperating Agencies, Participating Agencies, and Tribal
12 Governments, as well as the review and consideration of public input received at study
13 milestones.

14 The Project Team evaluated the comments received on the Recommended Alternative
15 presented in the Draft Tier 1 EIS. Based on this evaluation, FHWA and ADOT are proceeding
16 with a Preferred Alternative in this Final Tier 1 EIS that is different from the Recommended
17 Alternative in the Draft Tier 1 EIS. The Final Tier 1 EIS compares the Recommended
18 Alternative, the Preferred Alternative, and the No Build Alternative to characterize the potential
19 effects of each on the social, economic, and natural environments. The Preferred Alternative
20 balances transportation needs with impacts to the natural and human environment and
21 stakeholder input.

22 **ES.6.1 Summary of Alignment Differences between the Recommended and** 23 **Preferred Alternatives**

24 Changes between the Recommended and Preferred Alternative were based on feedback on the
25 Draft Tier 1 EIS and the additional technical analyses documented in **Chapter 3** (Affected
26 Environment and Environmental Consequences) and **Chapter 4** (Draft Preliminary Section 4(f)
27 Evaluation) of this Final Tier 1 EIS. The Preferred Alternative follows more existing highways
28 than the Recommended Alternative and includes segments co-located with I-19, I-8, SR 85,
29 I-10, and US 93. It also includes many of the new corridor segments from the Recommended
30 Alternative while incorporating several refinements to avoid and minimize potential impacts, as
31 described below:

- 32 • The Preferred Alternative carries forward both the west option in Pima County
33 (Recommended or Green Alternative) and the east option in Pima County (Orange
34 Alternative), allowing ADOT to make a more informed decision after completing detailed
35 environmental and engineering studies in Tier 2.
- 36 • The Preferred Alternative connects to I-10 at Park Link Drive north of Marana rather than
37 Tortolita Boulevard, which is responsive to feedback from the Town of Marana.

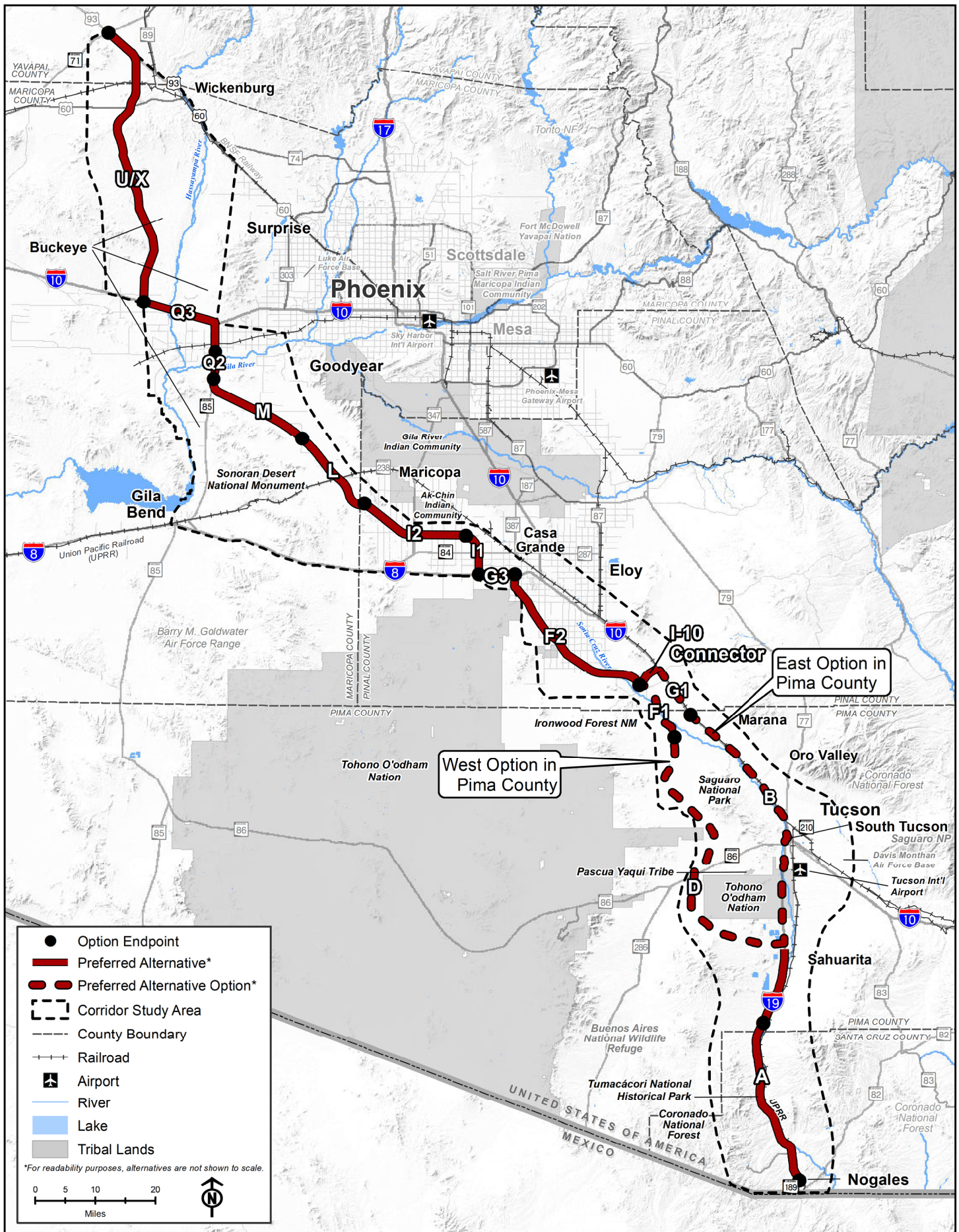


Figure ES-1. Preferred Alternative

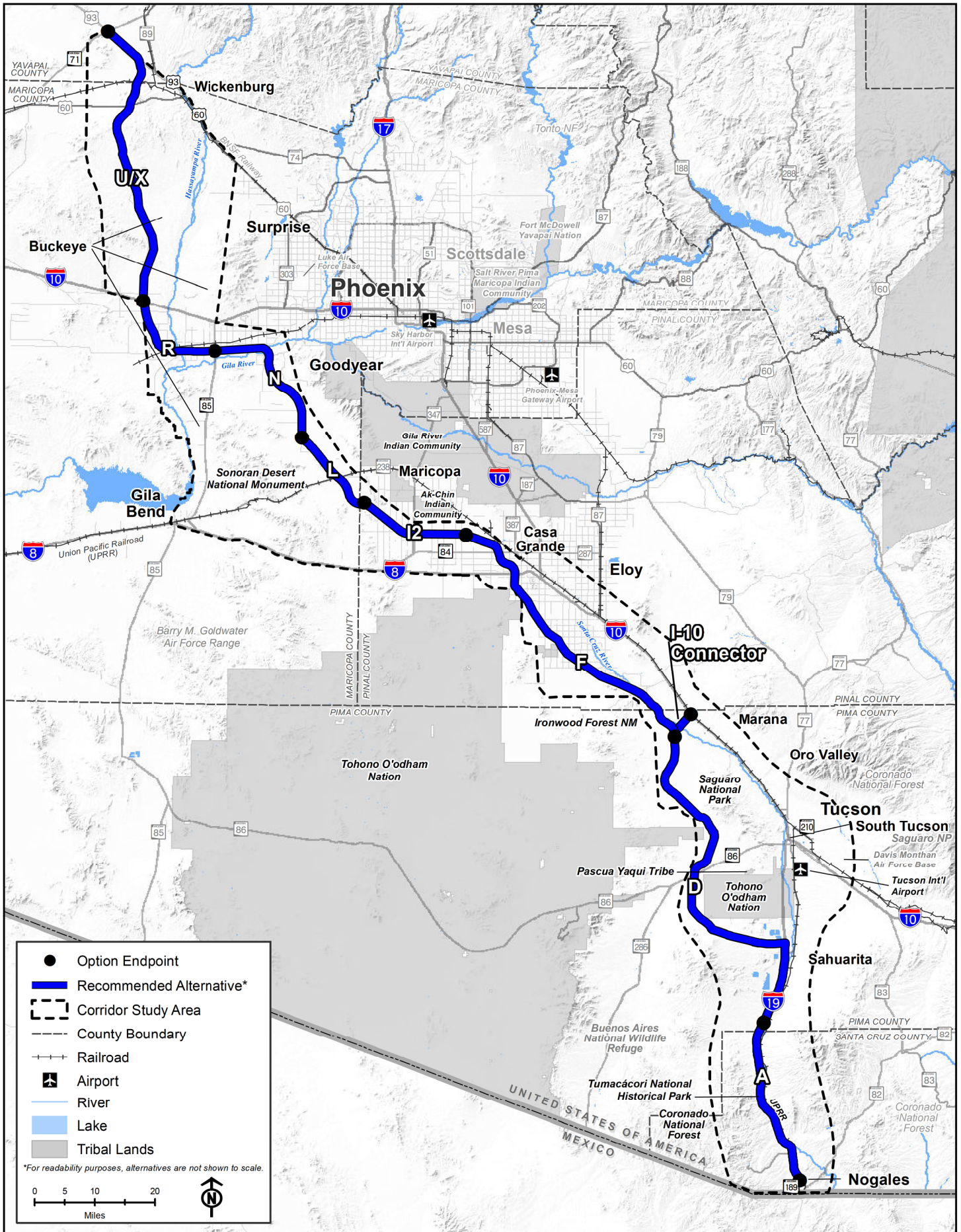


Figure ES-2. Recommended Alternative in the Draft Tier 1 EIS



- 1 • The Preferred Alternative incorporates a refinement in southern Pinal County to minimize
2 impacts to the Santa Cruz River in response to comments from the US Army Corps of
3 Engineers (USACE).
- 4 • The Preferred Alternative follows Montgomery Road north of I-8, which is consistent with
5 adopted plans and local agency feedback.
- 6 • The Preferred Alternative uses SR 85 and I-10 in the Buckeye area, eliminating new
7 crossings of the Gila River and Hassayampa River and minimizing impacts to critical riparian
8 habitat and federally protected species.
- 9 • The Preferred Alternative was shifted slightly west near US 93 in Yavapai County to
10 minimize impacts to residences, floodplains, wildlife linkages, and Sonoran Desert tortoise
11 habitat.

12 **Table ES-1** compares major geometric characteristics of the Recommended Alternative and
13 Preferred Alternative.

14 **Table ES-1. Characteristics of Recommended and Preferred Alternatives**

Characteristic	Recommended Alternative	Preferred Alternative with West Option in Pima County	Preferred Alternative with East Option in Pima County
Total Length (miles)	276.1	276.0	267.8
New Lane Miles	917	864	714

15 **ES.6.2 Purpose and Need Comparison**

16 **Table ES-2** compares the Recommended and Preferred Alternatives against Purpose and Need
17 metrics.

18 **Table ES-2. Considerations in Meeting the I-11 Purpose and Need: Recommended**
19 **and Preferred Alternatives**

Purpose and Need Metric	No Build Alternative	Recommended Alternative	Preferred Alternative with West Option in Pima County	Preferred Alternative with East Option in Pima County
Population and Employment Growth				
Provides Access to Planned Growth Areas ^a	Does not serve highest growth area (western	Best serves areas of greatest population and employment growth in the Study Area in Pinal and	Best serves Casa Grande and Wickenburg growth areas Serves growth in Buckeye well, but does not provide as much access to the Goodyear/ SR 303L area as the Recommended Alternative	



Purpose and Need Metric	No Build Alternative	Recommended Alternative	Preferred Alternative with West Option in Pima County	Preferred Alternative with East Option in Pima County
	Maricopa County), within the Study Area	western Maricopa Counties (Casa Grande, Goodyear, Buckeye, and Wickenburg)	Serves planned growth area near Ryan Airfield	Best serves continued population and employment growth centered along existing I-10 and I-19 (Sahuarita, Tucson, Marana)
Traffic Growth and Travel Time Reliability				
Reduces Travel Time for Long-Distance Traffic (2040 northbound travel time from Nogales to Wickenburg) ^b	297 minutes	234 minutes	236 minutes	250 minutes
Achieves Level of Service (LOS) C or better in rural areas, LOS D or better in urban areas on I-11 ^b	LOS F on existing roads in some areas	LOS C or better on I-11	LOS C or better on I-11	LOS C in rural areas outside of Tucson LOS D on I-11 in urban areas (Tucson)
System Linkages and Regional Mobility				
Effectively attracts/diverts traffic from existing roadways, as measured by:				
Percent increase in vehicle miles traveled (VMT)	No diversion of passenger vehicles or trucks	6 percent increase in passenger car and truck VMT	5 percent increase in passenger car and truck VMT	6 percent increase in passenger car and truck VMT
Percent increase in truck VMT		23 percent increase in truck VMT	21 percent increase in truck VMT	23 percent increase in truck VMT
Access to Economic Activity Centers				
Serves Key Economic Centers ^c	Serves 8 existing economic centers	Serves 16 economic centers, 8 existing and 8 emerging	Serves 15 economic centers, 6 existing and 9 emerging	Serves 17 economic centers, 8 existing and 9 emerging

Purpose and Need Metric	No Build Alternative	Recommended Alternative	Preferred Alternative with West Option in Pima County	Preferred Alternative with East Option in Pima County
Homeland Security and National Defense				
Provides an Alternate Regional Route ^d	No	Yes, for 247.4 miles of the total 276.1-mile-long alternative	Yes, for 219.5 miles of the total 276.0-mile-long alternative	Yes, for 143.1 miles of the total 267.8-mile-long alternative

- 1 ^a Planned growth areas included in this metric are shown as areas of growth on **Figure 1-4**.
- 2 ^b Measured in the afternoon peak period.
- 3 ^c Key economic centers are shown as existing and emerging employment clusters on **Figure 1-4**.
- 4 ^d Alternate regional route was reported by segment (lettered option) in the Draft Tier 1 EIS. The Final Tier 1 EIS reports this metric
- 5 by miles because segmentation has changed, and mileage provides a consistent measurement across all alternatives.

6 ES.6.3 Comparison of Impacted Resources

7 **Table ES-3** compares impacts for the Recommended and Preferred Alternatives where they are
 8 quantified in **Chapter 3** (Affected Environment and Environmental Consequences) and **Chapter**
 9 **4** (Draft Preliminary Section 4(f) Evaluation). There were no quantified differences for **Section**
 10 **3.11** (Hazardous Materials); **Section 3.12** (Geology, Soils, and Prime and Unique Farmlands);
 11 **Section 3.15** (Temporary and Construction-Related Impacts); and **Section 3.16** (Irreversible
 12 and Irretrievable Commitment of Resources); impacts are similar for these resources.

13 Under all Build Corridor Alternatives, construction of new transportation facilities could indirectly
 14 affect the type or pace of land use changes through the introduction of new access and more
 15 efficient travel corridors to undeveloped areas. Additionally, the Build Corridor Alternatives
 16 would add to the cumulative efficiency and mobility benefits provided by the transportation
 17 system through the diversion of traffic, improved travel times, lower congestion levels, improved
 18 safety, and more direct routes. Indirect and cumulative impacts for all alternatives from potential
 19 future actions are discussed further in **Section 3.17** (Indirect and Cumulative Effects).

20 **Table ES-3. Comparison of Impacts on Resources within the 2,000-foot-wide**
 21 **Corridors of the Recommended and Preferred Alternatives**

Resource	Recommended Alternative	Preferred Alternative with West Option in Pima County	Preferred Alternative with East Option in Pima County
Land Use (Section 3.3)			
BLM Land (acres)	6,415	10,861	10,323
Private Land (acres)	40,939	38,596	39,999
State Trust Land (acres)	12,629	17,241	12,487
Community Resources, Title VI, and Environmental Justice (Section 3.5)			
Project Area within Minority or Low-Income Communities (acres)	29,257	15,786	18,790



Resource	Recommended Alternative	Preferred Alternative with West Option in Pima County	Preferred Alternative with East Option in Pima County
Project Area within Minority or Low-Income Communities (% of total Project Area acres)	39%	24%	29%
Economic Impacts (Section 3.6)			
Gross Regional Product (\$ Billions)	\$12.2	\$11.7	\$9.6
Personal Income (\$ Billions)	\$10.3	\$10.1	\$8.5
Employment (Thousands of Job-Years)	136.2	130.2	106.7
Archaeological, Historical, Architectural, and Cultural Resources (Section 3.7)			
Percent covered by previous cultural resource surveys (% of total Project Area acres)	23%	28%	39%
Total recorded archaeological sites and historic structures within surveyed areas (number)	215	246	420
Estimated potentially NRHP-eligible archaeological sites and historic structures affected (number)	100	110	70
Total NRHP-listed or determined eligible historic districts and buildings affected (number)	0	0	4
Estimated unrecorded potentially NRHP-eligible historic districts and buildings affected (number)	4	3	5
Traditional Cultural Properties Potentially Directly Affected (number)	2	2	2
Visual and Aesthetics (Section 3.9)			
BLM Visual Resource Management Class I (acres)	0	0	0
BLM Visual Resource Management Class II (acres)	0	0	0
BLM Visual Resource Management Class III (acres)	2,988	3,097	2,568
BLM Visual Resource Management Class IV (acres)	3,495	7,583	7,583
Water Resources (Section 3.13)			
Within Active Management Areas for Groundwater (miles)	258	270	247
Within Sole Source Aquifers (miles)	106	119	98
Groundwater Wells (number)	887	636	1,183
Impaired Waters in Proximity (miles)	35	32	41



Resource	Recommended Alternative	Preferred Alternative with West Option in Pima County	Preferred Alternative with East Option in Pima County
Potential Waters of the US (miles)	306	323	312
National Wetland Inventory and Key Potential Wetlands (acres / number)	187 / 5	282 / 3	286 / 5
FEMA Floodplains (acres)	15,817	13,261	10,809
Biological Resources (Section 3.14)			
Riparian Areas (acres)	1,209	694	590
Important Bird Areas (acres)	1,464	1,133	572
Fragments Lost from Existing Large Intact Blocks (acres)	13,072	8,368	3,550
Section 4(f) Properties (Chapter 4)			
Potential Use of Section 4(f) Properties (number)	2	2	8

1 **ES.7 Coordination and Outreach**

2 FHWA and ADOT have undertaken continuous outreach efforts throughout the scoping process,
3 alternatives development, and preparation of the Draft Tier 1 EIS. Further detail and information
4 on the outreach described below can be found in **Chapter 5** (Coordination and Outreach) and
5 **Appendix G** (Public Involvement Materials) of the Draft Tier 1 EIS.

6 **ES.7.1 Coordination and Outreach for Draft Tier 1 EIS**

7 Major outreach opportunities prior to publication of the Draft Tier 1 EIS included pre-scoping,
8 scoping, agency/public information meetings, and recurring agency coordination meetings.

9 FHWA and ADOT requested local and federal agencies and tribal governments to participate in
10 the environmental review process by inviting them to be a Cooperating Agency or a
11 Participating Agency under NEPA guidelines. In addition, agencies and others were invited to
12 participate as consulting parties under Section 106 of the National Historic Preservation Act
13 (see **Section 3.7** [Archaeological, Historical, Architectural, and Cultural Resources]). There are
14 a total of 10 Cooperating Agencies and 51 Participating Agencies. Their roles and
15 responsibilities have included early and regular participation in the NEPA process and providing
16 comments and guidance on draft documents, including the Administrative Draft Tier 1 EIS.
17 Cooperating Agencies have continued to meet monthly throughout the NEPA process.

18 Tribes were invited to attend agency and stakeholder meetings at each major milestone
19 throughout the study process (2016 scoping activities and 2017 agency and public information
20 meetings). The Ak-Chin Indian Community, Gila River Indian Community, Pascua Yaqui Tribe,
21 and Tohono O’odham Nation were engaged throughout the study process. A series of smaller
22 meetings occurred with the Ak-Chin Indian Community, Gila River Indian Community, Salt River
23 Pima-Maricopa Indian Community, Tohono O’odham Nation, Pascua Yaqui Tribe, and other
24 tribal governments that requested individual meetings.



1 A 45-day scoping period held from May 23 to July 8, 2016, was initiated by the publication of the
2 Notice of Intent to Prepare a Tier 1 EIS in the Federal Register in May 2016 (81 FR 32007). The
3 input FHWA and ADOT received during scoping helped identify the opportunities and
4 constraints in the Study Area, the range of alternatives to be studied, and approach and
5 methodology for the environmental analysis.

6 **ES.7.2 Draft Tier 1 EIS Outreach and Public Review Period**

7 On April 5, 2019, FHWA published a notice of availability for the Draft Tier 1 EIS (84 FR 13662).
8 An Errata to the Draft Tier 1 EIS was prepared to include a section of the document missing
9 from the April 5, 2019, publication; it was made available for review on the project website on
10 April 25, 2019, and the comment period was extended through July 8, 2019 (84 FR 18634).
11 During the public review period, FHWA and ADOT conducted agency outreach and a public
12 hearing process to provide opportunities for comment. Six public hearings were held throughout
13 the Study Area and are listed in **Table 5-3. Appendix G** (Public Involvement Summary Report)
14 of this Final Tier 1 EIS provides more detailed information on the public hearings and the
15 outreach process for the public hearings.

16 The Project Team received 12,445 comment submissions through the official comment
17 channels during the official comment period. Refer to **Chapter 6** (Preferred Alternative) for a
18 summary of comments. All comments received during the April 5 to July 8, 2019, comment
19 period are addressed in **Appendix H** (Comments on Draft Tier I EIS and Responses) of this
20 Final Tier 1 EIS.

21 **ES.7.3 Coordination and Outreach Since Draft Tier 1 EIS**

22 Following the close of the Draft Tier 1 EIS public comment period on July 8, 2019, the Project
23 Team focused their efforts on reviewing and understanding comments and continued to meet
24 with agency partners. Agency outreach and coordination following the formal comment period
25 for the Draft Tier 1 EIS included one-on-one meetings with agency stakeholders so that ADOT
26 and FHWA could gain a better understanding of comments and potential solutions to address
27 concerns, as well as recurring cooperating agency, project management team, and executive
28 leadership team meetings.

29 **ES.8 Funding, Implementation, and Phasing**

30 Following the public review period for this Final Tier 1 EIS, FHWA and ADOT will publish a
31 Record of Decision that affirms a Selected Alternative. If FHWA and ADOT select a Build
32 Corridor Alternative in the Record of Decision, the build alternative would be implemented in
33 segments as funding is available. At this time, no funding has been identified to plan, design, or
34 construct any part of I-11, including any Tier 2 analysis. The implementation of the corridor
35 could entail federal, state, or local funding; tolling; or private-public partnerships. If the No Build
36 Alternative is selected, no I-11 project would occur.

37 ADOT may also phase Tier 2 projects according to the type of facility and extent of
38 improvements within a segment such as intersection or interchange improvements, additional
39 access controls, or construction of a two-lane, three-lane, or four-lane divided roadway that is
40 later upgraded to interstate standards.



- 1 ADOT will act as the lead agency on any future Tier 2 process for the I-11 project as FHWA and
2 ADOT entered a Memorandum of Understanding in April 2019 where ADOT was assigned
3 responsibility to conduct environmental reviews under NEPA.
- 4 Before initiating a Tier 2 project, ADOT would verify the termini, identify the scope, and
5 determine the specific class of NEPA analysis. The Tier 2 process would include NEPA analysis
6 to inform the selection of a specific alignment within the 2,000-foot-wide corridor, site-specific
7 environmental analyses, development of site-specific mitigation measures, and preliminary
8 design. The alignment is expected to be approximately 400 feet wide but will depend on site-
9 specific constraints and requirements. ADOT will continue to coordinate with tribes, public, and
10 agencies prior to and during Tier 2 project-level analysis.
- 11 See **Chapter 7** (Summary of Mitigation and Tier 2 Analysis) for a summary of specific Tier 2
12 studies and mitigation. Because this is a Tier 1 NEPA document, mitigation measures in the
13 Record of Decision represent commitments that will be implemented in I-11 Tier 2 projects.



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